Medical Diagnosis vs. Educational Eligibility

Understanding IEPs, Section 504 Plans, and Other Health Impairment (OHI)

Understanding the Difference

One misconception I frequently encounter in special education advocacy is the belief that a student automatically qualifies for an Individualized Education Program (IEP) because they have a medical diagnosis, such as ADHD, autism, anxiety, or another disability.

Another misconception is that students who earn good grades cannot qualify for an IEP or Section 504 plan.

Neither is necessarily true.

A medical diagnosis and educational eligibility are not the same thing.

Some students with medical diagnoses need specially designed instruction through an IEP. Others need accommodations or related services through Section 504. Some students may qualify for disability protections without needing a formal plan, while others may not meet educational eligibility criteria or need individualized school supports at all.

Eligibility must be determined based on the student's individual circumstances, applicable legal criteria, and disability-related educational needs.

1. What Is a Medical Diagnosis?

A medical or clinical diagnosis identifies a condition based on established diagnostic criteria. It may be provided by a physician, psychologist, or another qualified healthcare professional.

Examples include:

- Attention-Deficit/Hyperactivity Disorder (ADHD)
- Autism Spectrum Disorder
- Anxiety disorders
- Obsessive-Compulsive Disorder (OCD)
- Disruptive Mood Dysregulation Disorder (DMDD)
- Tourette syndrome
- Epilepsy or seizure disorders
- Asthma
- Diabetes
- Dyslexia
- Other physical, developmental, neurological, or mental health conditions

A medical diagnosis can provide valuable information about a student's disability, functioning, and support needs.

Schools must appropriately consider relevant medical and clinical information when evaluating a student and making educational decisions.

However, **a medical diagnosis does not automatically establish eligibility for an IEP or mean that a student needs a Section 504 plan.**

Likewise, a student does not necessarily need a medical diagnosis to qualify for special education or Section 504 protections.

Some Students With Medical Diagnoses Need Neither Plan

Not every student with a diagnosed disability requires individualized educational services or accommodations.

For example, a student may have a medical diagnosis but function successfully at school without requiring specially designed instruction, related services, or accommodations.

There are important distinctions:

- **IEP:** The student meets IDEA eligibility criteria and requires specially designed instruction because of the disability.
- **Section 504 plan:** The student has a qualifying disability and needs individualized accommodations, related aids, or services to receive FAPE.
- **Neither plan:** The student may not meet the applicable eligibility criteria or may not currently need individualized educational supports.

A student can also qualify for protection against disability discrimination under Section 504 without necessarily requiring a written 504 plan.

The diagnosis alone does not determine whether a student needs an IEP, a 504 plan, or neither.

2. IEP Eligibility Under IDEA

The Individuals with Disabilities Education Act (IDEA) establishes two essential requirements for special education eligibility.

A student must:

1. Meet the eligibility criteria for one or more disability categories recognized under IDEA.
2. **Because of the disability, need special education and related services.**

Special education means *specially designed instruction (SDI)*.

Under 34 CFR § 300.39, SDI involves adapting the content, methodology, or delivery of instruction, as appropriate, to address the student's unique disability-related needs and ensure access to the general education curriculum.

Specially Designed Instruction Is Not Limited to Academics

A common misconception is that a student must struggle with reading, writing, or math to need special education.

Educational needs are not limited to academic achievement.

Students may require specially designed instruction in areas such as:

- Reading, writing, or mathematics
- Communication and social interaction
- Emotional regulation
- Behavioral skills and replacement behaviors
- Executive functioning, organization, and task initiation
- Adaptive functioning and independence
- Social-emotional skills
- Other disability-related educational needs

For example, a student may be performing at or above grade level academically but require explicit, individualized instruction in emotional regulation, social communication, executive functioning, or other functional skills.
If the student meets an IDEA disability category and requires SDI because of the disability, academic success does not automatically rule out eligibility.
Educational performance includes academic, developmental, and functional considerations—not just grades or test scores.
Educational impact alone does not automatically establish IEP eligibility. The student must also meet IDEA disability criteria and require special education.

Related Services and IDEA Eligibility

Related services may include occupational therapy, speech-language services, counseling, physical therapy, and other supportive services necessary for a student to benefit from special education.
Generally, a student does not qualify under IDEA solely because they need a related service without requiring special education.
However, IDEA recognizes an exception when a service that would otherwise be considered a related service is classified as special education under applicable state standards.
The determination must be based on the student's needs and applicable eligibility requirements, not simply the type of service requested.

3. Understanding Other Health Impairment (OHI)

Other Health Impairment (OHI) is one of the 13 disability categories recognized under IDEA through which a student may qualify for special education services.
OHI is a broad eligibility category that can apply to students with various chronic or acute health conditions.
One misconception I frequently encounter is that OHI is primarily for students with ADHD.
OHI is not limited to ADHD or a specific list of medical diagnoses.
Under 34 CFR § 300.8(c)(9), OHI involves limited strength, vitality, or alertness, including heightened alertness to environmental stimuli that results in limited alertness with respect to the educational environment, due to a chronic or acute health problem that adversely affects educational performance.
The federal definition provides examples of health conditions, but the list is not exhaustive. Depending on the student's individual circumstances, OHI may be considered for conditions such as:

- ADHD
- Tourette syndrome
- Epilepsy or seizure disorders
- Asthma
- Diabetes
- Anxiety disorders
- OCD
- DMDD
- Autism

- Other chronic or acute health conditions

Having one of these diagnoses does not automatically establish OHI eligibility.
The evaluation must establish that the student meets the applicable OHI criteria, including the required effects on strength, vitality, or alertness and educational performance.
The student must also need specially designed instruction to qualify under IDEA.
Some students may qualify under another IDEA category that more accurately reflects their disability-related educational needs.
For example, autism has its own IDEA eligibility category, but a medical autism diagnosis does not automatically establish educational eligibility under that category or prevent consideration of another category when supported by the evaluation.
The appropriate IDEA classification is determined through educational eligibility criteria—not simply the name of the medical diagnosis.
Federal reference: 34 CFR § 300.8(c)(9)
https://sites.ed.gov/idea/regs/b/a/300.8/c/9

4. Can a School Require a Medical Diagnosis or Medical Evaluation?

Parents are sometimes told that they must obtain a medical diagnosis before the school will consider evaluating their child for special education.
A school cannot make a privately obtained medical diagnosis a blanket prerequisite for initiating or conducting an IDEA evaluation.
Under IDEA, school districts have Child Find responsibilities to identify, locate, and evaluate children suspected of having disabilities and needing special education.
Parents may request an evaluation based on suspected disability-related educational needs, even without a medical diagnosis.

What if the School Believes a Medical Evaluation Is Necessary?

Certain suspected disabilities or eligibility categories may require medical information to make an appropriate educational determination.
For example, a team considering OHI eligibility may determine that a medical assessment or health information is necessary to establish whether the student meets the applicable criteria.
When a school district determines that a medical evaluation or assessment is necessary to complete an IDEA or Section 504 evaluation, the district must ensure that the necessary assessment is provided at no cost to the parent.
Schools cannot shift the financial responsibility for required evaluations to families by directing them to obtain and pay for medical documentation.
This does not mean schools must pay for every medical appointment, independently requested diagnosis, or treatment. The obligation applies to assessments necessary to fulfill the district's evaluation responsibilities.

If the district believes medical information is needed, parents can ask:

- What specific information is necessary to determine eligibility?
- Why is that information needed?
- Will the district arrange and fund the necessary evaluation?

- How will the evaluation be incorporated into the comprehensive special education evaluation?

Parents should not be required to independently pay for a medical evaluation that the district determines is necessary to complete its IDEA or Section 504 evaluation responsibilities.

Federal references:
34 CFR § 300.15 — Evaluation
https://sites.ed.gov/idea/regs/b/a/300.15
34 CFR § 300.304 — Evaluation Procedures
https://sites.ed.gov/idea/regs/b/d/300.304
34 CFR § 300.301 — Initial Evaluations
https://sites.ed.gov/idea/regs/b/d/300.301

5. Section 504 Eligibility

Section 504 of the Rehabilitation Act has a different disability standard from IDEA.
A student may qualify for protection under Section 504 when they have a physical or mental impairment that substantially limits one or more major life activities.
Major life activities include, but are not limited to:

- Learning, reading, and writing
- Concentrating and thinking
- Communicating
- Walking and other physical activities
- Eating, breathing, and sleeping
- Major bodily functions, including neurological, respiratory, and endocrine functions

A student does not have to require specially designed instruction to qualify under Section 504.

For example, a student with ADHD may need accommodations for attention, organization, or task completion but not require SDI.
A student with epilepsy, diabetes, or asthma may need individualized health-related supports or accommodations during the school day.
A student with anxiety may require supports to participate in instruction and school activities.

Section 504 Is Not Limited to Academic Performance

A student may qualify for Section 504 protections even when their disability does not substantially limit learning.
For example, a student may have excellent grades but experience substantial limitations in breathing, concentrating, neurological functioning, or another major life activity.

Good grades do not automatically rule out Section 504 eligibility.

Medication and Other Mitigating Measures

When determining whether an impairment substantially limits a major life activity under Section 504, schools generally must consider the impairment without the beneficial effects of mitigating measures, such as medication, assistive technology, or learned behavioral adaptations.

Ordinary eyeglasses and contact lenses are an exception.

For example, a student whose ADHD symptoms are effectively managed with medication may still qualify as a student with a disability under Section 504.

A student should not be found ineligible simply because medication or other mitigating measures reduce the visible effects of the disability.

However, qualifying for Section 504 protection does not automatically mean the student requires a particular accommodation or written plan.

Schools must individually determine what aids or services, if any, are necessary to provide FAPE.

6. Good Grades Do Not Rule Out an IEP or Section 504

A student can earn straight A's, participate in honors classes, or advance from grade to grade and still qualify for special education or Section 504.

Educational performance is not limited to reading, writing, math, or report card grades.

Disabilities may affect:

- Academic achievement
- Communication and language
- Social-emotional functioning
- Behavior and emotional regulation
- Executive functioning
- Organization and independence
- Adaptive and functional skills
- Attendance and school participation
- Other disability-related areas of educational functioning

For example, a student may maintain strong grades but require significant adult assistance to initiate assignments, regulate emotions, communicate needs, or participate appropriately in the educational environment.

A student may also be academically successful because of extensive support from parents, teachers, or others.

IDEA specifically provides that a student must not be determined ineligible solely because they are advancing from grade to grade if they otherwise meet eligibility criteria.

The question is not simply whether the student is passing.

The team must determine whether the student meets the applicable disability criteria and what instruction, services, or supports are necessary to address their individual educational needs.

7. Is an IEP Better Than a Section 504 Plan?

I frequently encounter parents who believe an IEP is automatically better than a 504 plan.
That is not necessarily the case.
Both provide important protections, but their eligibility requirements and purposes differ.

IEP Under IDEA	Section 504
Requires eligibility under an IDEA disability category and a need for special education	Requires a physical or mental impairment that substantially limits a major life activity
Includes specially designed instruction	Does not require SDI for disability eligibility
Includes measurable annual goals, special education services, related services, accommodations, and other required components	May include accommodations, related aids and services, special education, or other necessary supports
Requires specific IDEA procedures for IEP development, implementation, and progress reporting	Requires individualized evaluation and FAPE protections under Section 504
Students are also protected under Section 504	Section 504 eligibility does not automatically establish IDEA eligibility

A student who qualifies under IDEA is also protected by Section 504.
A student who does not meet IDEA eligibility criteria may still qualify under Section 504.
A student may also have a medical diagnosis without requiring an IEP or a 504 plan.
An IEP should not be pursued simply because it is perceived as better. The appropriate plan depends on the student's eligibility and needs.
Likewise, a 504 plan should not be used as a substitute for an IEP when a student meets IDEA eligibility criteria and requires specially designed instruction.

8. Who Determines Educational Eligibility?

A medical provider may diagnose a condition and recommend educational accommodations, services, or supports.
However, **medical providers do not independently determine IDEA or Section 504 eligibility.**
Under IDEA, educational eligibility is determined by the appropriate group of qualified professionals and the parent, based on the evaluation results and applicable criteria.
Section 504 placement and service decisions must be made by a group of persons knowledgeable about the student, the evaluation data, and placement options.
Schools must meaningfully consider relevant medical documentation, outside evaluations, and recommendations when making educational decisions.
They are not automatically required to agree with or implement every recommendation made by a medical provider. However, **when a team declines a recommendation, its decision should be supported by individualized evaluation information, relevant data, and a clear explanation of its reasoning.**

Schools cannot simply disregard medical information because it comes from an outside professional or because the student is performing well academically.
Parents can request clarification about how the medical information was considered, what information supports the team's decision, and how the student's identified needs will otherwise be addressed.
Educational eligibility decisions must be individualized and based on appropriate evaluation information.

9. What Should Parents Do?

If you suspect your child has a disability and may need specially designed instruction, request a comprehensive initial special education evaluation in writing.
The request should explain your concerns and how they affect your child's learning, participation, behavior, communication, social-emotional functioning, independence, or other educational needs.
Under IDEA, evaluations must assess all areas of suspected disability and identify the student's special education and related-services needs, whether or not commonly associated with a particular eligibility category. Schools cannot require a student to fail academically before considering eligibility. General education interventions also cannot be used to unnecessarily delay or deny an evaluation when a disability is suspected.
If the district refuses a requested IDEA evaluation, it must provide Prior Written Notice explaining the refusal, the reasons for its decision, and the information used.
If your child may not require SDI but has a disability that substantially limits a major life activity, consider requesting an evaluation under Section 504.
Parents do not have to identify the correct IDEA disability classification or obtain a medical diagnosis before requesting an educational evaluation.

10. Questions Parents Can Ask

- What disability-related educational needs have been identified beyond my child's medical diagnosis?
- Has the school considered academic, social-emotional, behavioral, communication, executive-functioning, and other functional needs?
- Does my child require specially designed instruction? What information supports that decision?
- If SDI is not needed, how will the identified disability-related needs be addressed?
- If medical information is necessary for eligibility, will the district arrange and fund the required evaluation?
- Has Section 504 eligibility been considered when IDEA eligibility is not established?
- Has the team considered the impact of the disability beyond grades and academic performance?
- Are decisions based on comprehensive evaluation information rather than assumptions about a diagnosis?
- What services or supports are necessary for my child to access education and participate meaningfully?

My Bottom Line

A medical diagnosis does not automatically qualify a student for an IEP.
A medical diagnosis does not automatically mean a student needs a 504 plan.
A student does not necessarily need a medical diagnosis to qualify for special education.
Good grades do not automatically disqualify a student from either IDEA or Section 504 eligibility.
Educational needs are not limited to academics. They include social-emotional, behavioral, communication, developmental, and functional needs.
Some students require specially designed instruction. Others require accommodations, related aids, or services. Some qualify for disability protections without needing a formal plan, and others may not require individualized educational supports.
Eligibility and services must be based on the student's individual needs and applicable legal criteria—not simply the diagnosis, grades, or assumptions about which plan is better.
As an advocate, my focus is not on obtaining a particular classification or document for its own sake.
My priority is ensuring students receive the instruction, services, accommodations, and supports they need to access their education and make meaningful progress.

Federal Law and Resources

IDEA — Disability Categories and Eligibility
34 CFR § 300.8
https://sites.ed.gov/idea/regs/b/a/300.8
IDEA — Other Health Impairment
34 CFR § 300.8(c)(9)
https://sites.ed.gov/idea/regs/b/a/300.8/c/9
IDEA — Special Education and Specially Designed Instruction
34 CFR § 300.39
https://sites.ed.gov/idea/regs/b/a/300.39
IDEA — Child Find
34 CFR § 300.111
https://sites.ed.gov/idea/regs/b/b/300.111
IDEA — Initial Evaluations
34 CFR § 300.301
https://sites.ed.gov/idea/regs/b/d/300.301
IDEA — Evaluation Procedures
34 CFR § 300.304
https://sites.ed.gov/idea/regs/b/d/300.304
IDEA — Eligibility Determination
34 CFR § 300.306
https://sites.ed.gov/idea/regs/b/d/300.306
IDEA — Prior Written Notice
34 CFR § 300.503
https://sites.ed.gov/idea/regs/b/e/300.503
Section 504 — Definitions
34 CFR § 104.3
https://www.ecfr.gov/current/title-34/section-104.3

Section 504 — Free Appropriate Public Education
34 CFR § 104.33
https://www.ecfr.gov/current/title-34/section-104.33
Section 504 — Evaluation and Placement
34 CFR § 104.35
https://www.ecfr.gov/current/title-34/section-104.35
IDEA — Related Services, Including Medical Services for Diagnostic or Evaluation Purposes
34 CFR § 300.34
https://sites.ed.gov/idea/regs/b/a/300.34
U.S. Department of Education — Frequently Asked Questions: Disability Discrimination
https://www.ed.gov/laws-and-policy/civil-rights-laws/disability-discrimination/frequently-asked-questions-disability-discrimination
IDEA — 2006 Final Regulations, Analysis of Comments and Changes
Federal Register, August 14, 2006, 71 FR 46550–46551
Section: Other Health Impairment (§ 300.8(c)(9))
https://www.govinfo.gov/content/pkg/FR-2006-08-14/html/06-6656.htm

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