

# Scrutinizing Disability Documentation Across the Lifespan

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# Agenda

- IDEIA vs. ADA AA
- Introduction to ETS
- Accommodations review process
- ETS Documentation guidelines: Spotlight on LD, ADHD, and Psychiatric documentation guidelines
- Documentation and accommodations: Post-secondary education vs. high-stakes testing
- Accommodations in employment
- Case Study

# IDEIA vs. ADA AA

# Different Laws for Different Settings

## **Individuals with Disabilities Education Improvement Act**

- Primary focus is on success
- K-12 schools responsible for locating children with disabilities
- Documentation updates are the responsibility of the school district
- Modifications and accommodations provided
- IEPs primarily used

## **Americans with Disabilities Act Amendment Act**

- Primary focus is equal access
- Student is responsible for identifying that they have a disability
- Documentation updates are the responsibility of the individual
- Only accommodations can be provided
- IEPs not typically supportive

# Modifications and Accommodations: What's the Difference?

## Modifications

- Decreased number of options for multiple choice tests
- Ignore spelling errors
- Reduced number of test questions
- Rewording of test questions
- Behavioral assistant

## Accommodations

- Extended testing time
- Stop-the-clock breaks
- Reader
- Scribe
- Separate room
- Personal care attendant



# Introduction to ETS

# What is ETS?

- ETS is the world's largest high-stakes testing agency receiving 15,000 requests for accommodations each year
- We administer Praxis (teacher certification tests), GRE (Graduate Record Exam), TOEFL (Test of English as a Foreign Language), and HiSET (High School Equivalency Test)
- We use a labor-intensive process to determine the need for accommodations on these tests
- The College Board is our largest client but they have a different process for documentation review.

# Who's Who at ETS

- Office of Disability Policy (Research & Development)
  - Sets policies and procedures
- Internal & External Reviewers
  - Performs initial review of applications
  - 37 expert panel reviewers
- Disability Services
  - Call center and processing
- General Counsel's Office
  - Responds to legal complaints



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# Accommodations Review Process

# Accommodations Review Process

- The review process is different for each college/university and testing agency.
- Be sure to review the website for the school you are applying to or the test you need to take to find out how to apply for accommodations
- General steps:
  - Complete the necessary forms
  - Review the documentation requirements
  - Submit the necessary documentation
  - The school or testing agency will notify you of approved accommodations and how to proceed to use the accommodations

# ETS Has a Short-Cut

- The Certification of Eligibility: Accommodations History form can be submitted for most disabilities including LD, ADHD, ASD, TBI, physical, and psychiatric disabilities requesting 50% extended test time and extra breaks
- The documentation on file at the post-secondary institution must align with ETS documentation guidelines, including recency requirements
- Documentation for medical disabilities/chronic health conditions and “other” still requires review due to the episodic/transitory nature of these disabilities

# When Does ETS Require Documentation?

- When you are requesting accommodations other than 50% extended time and breaks
- When your documentation is slightly outdated
- When you do not qualify to submit the COE form
- Documentation should only be submitted if it is required
- Guidelines for documenting specific disability categories is available on our website ([www.ets.org/disabilities](http://www.ets.org/disabilities))

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# ETS Documentation Guidelines

# General Documentation Criteria

- Documentation must be completed by an evaluator qualified to make the diagnosis and determine functional limitations
- Clearly state the diagnosed disability or disabilities
- Describe the functional limitations
- Be current
- Include summary of historical information
- Include a list of test instruments, if applicable
- Describe the specific accommodations requested
- Adequately support each of the testing accommodations requested

# ETS Guidelines for Documenting Learning Disabilities

- Recency: 5 years
- Qualified evaluators include: school or clinical psychologist, neuropsychologist, etc.
- Neuropsychological or Psycho-Educational evaluation should include measures using adult norms
- Cognitive and achievement testing is necessary
- Evaluation report should include a thorough history: developmental, educational, occupational, medical, etc.
- Evaluation report should include an analysis of the data, an interpretive summary, and a rationale for each accommodation

# ETS Guidelines for Documenting ADHD

- Recency: 5 years
- Qualified evaluators: school or clinical psychologist, psychiatrist, social worker, neurologist, etc.
- Evaluation report should include a thorough history: developmental, educational, occupational, medical, etc.
- Evaluation report should include an analysis of the data, an interpretive summary, and a rationale for each accommodation
- Assessment of memory, attention, executive function, and processing speed is needed if requesting 100% extended time or a separate room
- Achievement testing is necessary if requesting anything of an academic nature such as a calculator or reader



# ETS Guidelines for Documenting Psychiatric Disabilities

- Recency: 1 year
- Qualified evaluators: psychiatrist, clinical or school psychologist, licensed mental health professional, etc.
- Documentation must include a clear description of the individual's functional limitations, how these limitations impact them in the testing environment, severity/duration/frequency of symptoms, effects of medication use (if applicable), and a rationale for the requested accommodations

# Supplemental Information

- We always welcome test takers to provide additional sources of information to support their disability documentation, such as, personal statements and letters of support from their DS provider
- Guidance for how to compose a personal statement is available on the website at [www.ets.org/disabilities](http://www.ets.org/disabilities).
- Letters of support from DS service providers describing the accommodation utilized and attesting to the effectiveness of the accommodations may be helpful. "Tips for Disability Service Providers" is available on our website ([www.ets.org/disabilities](http://www.ets.org/disabilities))
  - We have revised our Tips for Test Takers brochure and copies are available!



# Documentation and Accommodations: Post-secondary Education vs. High Stakes Testing

# Post-secondary Education vs. High-Stakes Testing

- Each college campus just like each testing agency may have differing documentation requirements
- Review the website of the school or testing agency to determine documentation requirements
- College DS offices may be more flexible than testing agencies as they have the opportunity to meet with students face-to-face
- Some differing accommodations between college settings and testing agencies:
  - Reduced distraction testing environment with few people vs. separate room
  - Extended test time vs. extra “stop the clock” breaks
  - The accommodation requested presents a test construct issue



# Accommodations in Employment

# Accommodations in Employment

- Under the Title I of the ADA, a reasonable accommodation is a modification or adjustment to the job or hiring process.
- The accommodations enable a *qualified* individual with a disability to perform the *essential functions* of the job
- Many places of employment, typically within Human Resources (HR), are dedicated to reviewing workplace accommodation requests
- Documentation requirements varies among employment settings and disclosure can often be a difficult and personal decision
- Depending on the nature of work, HR may need to review the logistics of the request with the employees' hiring manager or supervisor without disclosing confidential information about the disability

# Case Study



# Case Study

- Test taker self-identified as having a learning disability and requested 50% extended test time and a reader for the Praxis
- An IEP with limited objective data and discussion was submitted as documentation. The limited objective data provided was also nearly outdated.
- Test taker was granted 50% extended test time and an updated evaluation report that includes comprehensive cognitive and achievement testing was requested for reconsideration of request for a reader.



# Case Study Discussion

- How may this documentation play out in these different settings?
  - K-12
  - Post-secondary education
  - Standardized testing entity
  - Employment

# Q&A