

Definition of Disability Accommodations Extended Timing

Documentation

Scores
Requests
Appealing Decisions
Practicing



The Big Picture: Changes in Disability Law Benefit Students Seeking Accommodations

Students seeking accommodations on the SAT and ACT will be the clear beneficiaries of recent changes to federal disabilities law. In 2016, the Department of Justice (DOJ) published updated guidance for testing companies, reflecting how accommodations are to be granted in compliance with the amended Americans with Disabilities Act (ADA), which broadened both the definition of disability and the scope of protections afforded to those with disabilities. The new DOJ guidance called for

streamlining of the accommodations

process, a reduction in repeated costly testing, and a limitation on the requirements for documentation of a disability.

DOJ's goal was clear: lower the hurdles, decrease the cost, simplify the process, and increase access. Two notable changes in guidance involved the expanded role of the high school in allocating accommodations and the manner in which testing companies should evaluate accommodations requests.

Placing the High School at the Center of the Accommodations Process

Under the new guidance, high schools have become the de facto gatekeepers for SAT and ACT accommodations. DOJ clarified that students receiving testing accommodations in their high school should "generally receive the same testing accommodations for a current standardized exam or high-stakes test." This applies to students receiving accommodations under an Individualized Education Program (IEP), a Section 504 Plan, or a formal private school plan. Additionally, students with disabilities who have received informal school-based accommodations may also be eligible to receive accommodations on high-stakes tests. A school's decision of whether to grant accommodations will have a profound effect on the likelihood of a student securing accommodations on the SAT or ACT.

High schools are also central to the application process for SAT and ACT accommodations. A student or family will initiate the request, and the school's testing or disabilities coordinator will see it through



to completion, submitting the application via the test companies' online portals, assembling and uploading any necessary documentation.

Simplifying The Process: The College Board's 2-Question Policy

Responding to DOJ's guidance, the College Board announced sweeping changes to its policy of granting testing accommodations. As of January 1, 2017, the College Board will *automatically* approve testing accommodations for the vast majority of students who are approved for and use testing accommodations in their school. The College Board announced its simplified "two-question" process:

- 1) "Is the requested accommodation(s) in the student's plan?"
- 2) "Has the student used the accommodation(s) for school testing?"

According to the College Board, the answers to these two questions will determine whether the requested accommodations will be granted:

If the answer is yes to both questions, eligible students can be approved to receive most accommodations on College Board exams.

In most cases the College Board will defer to the school's judgment and honor accommodations granted through a current IEP, 504 Plan or other formal testing plan. This approach streamlines the entire accommodations process, minimizes the need for submission of additional documentation, and saves resources for all involved. The ACT, Inc. has yet to make such a bold move but may update its policies to further align with the amended ADA.



Navigating the Process: What Types of Testing Accommodations are Available?

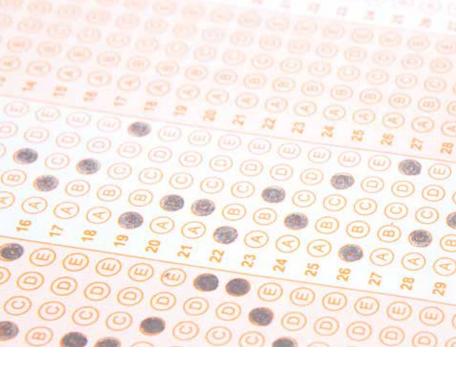
Even as the process becomes more streamlined, it's important for parents, students, and their advisers to be aware of the options available. This will help ensure a more successful experience for everyone. For students with disabilities, an array of accommodations are available, ranging from a quiet testing room to the use of a computer, a reader or scribe, enlarged print test booklets to extended breaks and timing. Different clinical diagnoses may warrant the same testing accommodation. For example, students with ADHD, fine motor deficits, working memory deficits or OCD all may receive an extended time accommodation.

Extended Timing

The most common testing accommodation is 50% extended time, requested frequently by students suffering from ADHD and processing speed deficits. The 100% extended time accommodation is generally reserved for students with more severe disabilities.

Extra time on the SAT will benefit some, but not all students. The College Board redesigned the SAT with a decreased emphasis on processing speed, granting students 40% more time per question than the ACT. This effectively decreased many students' need for additional timing. Students who still need and receive extended time on the SAT will be forced to remain in each SAT section (e.g., Writing, Reading) until the time allotted is exhausted. Having to wait at length before advancing to the next section can be a challenge for students with attention deficits. Some students run out of steam by the conclusion of the nearly 6.5-hour testing administration. In some cases, a better accommodation for students with ADHD is longer or additional breaks between sections.

In contrast an ACT extended time accommodation will benefit nearly every student. The ACT emphasizes processing speed, and



many students without learning differences find that the test is difficult, if not impossible, to finish with standard timing. Moreover, when students are granted a 50% extended time accommodation on the ACT, they are allowed to self-pace through the test and finish sections on their own schedule. This alone makes the ACT accommodation more valuable for most students.

Receiving 100% extended time on the ACT affords students the optimal scenario to attain peak performance. In this format students take a single test section per school day, frequently in a quiet room, before returning to their regular classes. On the first day of testing students will have to sustain focus for a maximum of two hours for the math administration, followed by 90 minutes for English, and just 70 minutes each for the Science and Reading sections on successive testing days. By minimizing the time for sustained focus, this format solves for the majority of attentional issues. In a multi-day format, with or without extended timing, students also have the tremendous benefit of being able to prepare the night before each test section.

How do Accommodations Impact Scores?

Analyzing Applerouth Tutoring Services' dataset of 15,000+ students, it is clear that extended time is a boon for the majority of test-takers. Our ACT students who have received extended timing accommodations commence the testing process with scores that are 3.2 ACT points lower than those of their unaccommodated peers; however, they ultimately attain score increases that are 1.6 points greater. The pattern is similar for students taking the redesigned SAT, though the effect sizes of the accommodations are still becoming apparent. These score patterns provide evidence that accommodations are in fact helping to level the playing field for students with learning differences.



Diagnostic Testing and Documentation

To qualify for testing accommodations, a student must present evidence of a professionally diagnosed disability and document its impact on daily functioning and test-taking. The testing entities will look to the high school to determine whether a formal accommodation plan is in place and how long it has been in effect. The College Board wants to see four months of use of the accommodation, the ACT a full year. If a testing plan is on file and the student has been using the accommodations over the desired period of time, accommodations typically follow without great difficulty.

In cases where there is no formal accommodation plan, an inadequate history of use of the accommodation, or a recent diagnosis, the student will be asked to provide full documentation of his/her disability. The necessary documentation will vary based on the type of disability and accommodation requested, but may range from physician's reports to teacher's reports to neuropsychological or psychoeducational evaluations. The SAT and ACT websites clearly delineate the required documentation for each type of accommodation requested.

Parents can facilitate the process by maintaining organized records of their child's academic history, testing, and special education interventions. Preserve all documentation that may one day be used to make the case for testing accommodations. Save any letters or reports from teachers who have given formal or informal accommodations and observed their positive impact.

When formal psychological testing is mandated, the ACT currently requires a professional report that is no more than three years old,

while the College Board will accept a report that is five years old. LD specialists advocate that students with disabilities update their testing at 16, using adult-scaled instruments such as the WAIS. Using adult testing forms within three years of applying to college will ensure that the updated testing will be valid both for the college assessments and for college disability offices.

Private school students will typically pursue private evaluations from licensed psychologists or test administrators. Public school students may be able to secure the appropriate testing though their school system but, in some cases, will need to supplement school testing with external private evaluations. If a student is close to graduation and has never requested or received any prior classroom accommodation, the school may deny the request, particularly if the student has performed well academically.



Timing the Request

Students seeking ACT accommodation should apply as soon as the coming year's test dates are open for registration. Apply as early as June for fall or winter tests. Students seeking accommodations for the junior PSAT or fall SATs should submit the request in the spring of sophomore year. Students who secure accommodations for the sophomore PLAN or PSAT will have a greatly expedited process of securing accommodations for the SAT or ACT.

The ACT typically processes accommodations requests in three to four weeks. The College Board historically has taken longer, waiting up to seven weeks to provide an answer, but this may be changing. Be mindful that students seeking special accommodations, apart from 50% extended time, may need to locate an alternative testing site that offers the specific accommodation they have been granted, as all sites do not offer all possible accommodations.

Appealing a Decision

If an accommodations request is denied, families will be asked to submit additional documentation or evidence to support the request. An appeal must include new evidence to be considered. The testing organization will generally explain what new information is required. This may consist of additional testing or a more detailed letter from your school's disability coordinator. Alternatively, reviewers may find conflicting or inconsistent findings from the psychological testing.



In these cases, the evaluating psychologist will need to address those issues and write a letter emphasizing the effect of the disability and the necessity of the accommodation. A well-crafted response from the psychologist may determine the success of the appeal. When submitting the appeal, be comprehensive: send everything in support of the requested accommodation. If the appeal is rejected, consider applying to the alternate testing agency to gain the desired accommodation.

The odds of a preliminary rejection are higher if the disability was diagnosed later in the student's academic career. If a student has a late-diagnosed disability, the family may need to provide additional supporting evidence to justify why the disability wasn't picked

up earlier or how their child was able perform effectively in school in light of this disability. Teacher observation forms may be particularly helpful in these instances.

Be mindful of time constraints in the appeals process. If you need to schedule supplemental testing with a psychologist and await the results before resubmitting, precious time will have elapsed. Sometimes the clock simply runs out. Begin the process early to build in time for an appeal.



Should your child seek SAT or ACT accommodations?

To determine whether to apply for a testing accommodation on the SAT or ACT or both, there are two principal approaches. Students can apply for accommodations on both tests and evaluate the differences in granted accommodations. Alternately, students can take a timed practice SAT or ACT test with the desired accommodation to determine the degree to which the accommodation positively affects the scores. By comparing the results from an extended time practice ACT and SAT, parents and independent educational consultants can quickly make an evaluation regarding the better assessment for the child.

Preparing for the Official Tests

Once granted an accommodation, the student should approach all preparatory activities in light of that accommodation, carrying out all homework and practice tests under the conditions that he or she will experience on the official test.

Concluding Thoughts

Families who are contemplating securing accommodations should commence the process as soon as possible. Advocate for necessary testing and save all educational records. Work closely with the school's disability office, and seek accommodations on high school tests as soon as a disability is identified. This process may be time and resource intensive, but the effects of a student receiving the proper accommodations can be profound: it's well-worth the investment.

Written by Jed Applerouth, Applerouth Tutoring Services, LLC, for the Independent Educational Consultants Association

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