

## **Practice Document**

### *Ensuring Equitable Access to Testing Accommodations for Post-Secondary Students*

Over the past thirty years, students with disabilities are increasingly enrolling in postsecondary education and facing unique challenges related to their impairments (Kimball, et al., 2016; Lindstrom & Lindstrom, 2017; Newman et al., 2010; Weis et al., 2016). Some of the difficulties youth with disabilities may encounter en route to college include challenges in time management, organization, sustaining concentration, meeting deadlines, and processing information (Lindstrom & Lindstrom, 2017; Kimball, et al., 2016; Schaffer et al., 2021). To help prospective postsecondary students with disabilities obtain equal access to a college education, both the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, indicate that these youth have a right to access their accommodations after graduating from high school (Association on Higher Education and Disability [AHEAD], 2020; Lindstrom & Lindstrom, 2017). However, both postsecondary institutions and testing companies may request documentation to verify a student's disability status and the need for such accommodations (Lindstrom & Lindstrom, 2017). Therefore, students with disabilities pursuing a degree in higher education will need documentation to maintain their accommodations beyond high school.

Given their ability to help children learn, grow, and succeed throughout their lifespan, school psychologists can be a great ally for prospective college students with disabilities, especially when it comes to assisting them in accessing their accommodations in college and on admittance exams (Kellems et al., 2016; Wilczenski et al., 2017). Moreover, school psychologists have a responsibility to be knowledgeable about transition-related supports and may be able to assist students with disabilities in identifying existing documentation in their education records, such as psychological testing, that may help them obtain their accommodations in college and on college admissions exams (Ducharme et al., 2020; U. S. Department of Education, 2011). While standardized college entrance and graduate exams are intended to ensure comparability of test scores for postsecondary admittance, it has been acknowledged that these tests may make it challenging for many individuals with disabilities to accurately demonstrate their true ability (United States Government Accountability Office, 2011). This is because many of these testing agencies often request extensive and specific documentation for students with disabilities to access their accommodations (Lindstrom & Lindstrom, 2017; United States Government Accountability Office, 2011). For instance, Lindstrom and Lindstrom (2017) note that testing companies often deny students with disabilities access to accommodations if the psychological report fails to show an objective history of the student's difficulties or fails to document the student's current levels of functioning. Moreover, testing companies may deny students their accommodations if psychological reports only include generic recommendations (Lindstrom & Lindstrom, 2017). Since school psychologists often have access to documentation that testing companies need to afford students their accommodations. They can be of great assistance.

In considering the potential long-term impact of a student's disability beyond high school, it is important for school psychologists to note that many companies that publish college admissions exams accept documentation and evaluations that are up to five years old (College Board, n. d.; Educational Testing Service, n. d.). Therefore, the documentation and evaluations provided by school psychologists can play a critical role in ensuring that undergraduate and even graduate students continue to receive their accommodations on admissions exams (College Board, n. d.; Educational Testing Service, n. d.). For these reasons, it is important for school psychologists to recognize and consider that their evaluations and records could potentially have implications for prospective college students with disabilities beyond high school. Therefore, during transition planning, it is recommended that school psychologists provide insight as to how the student's disability has historically impacted the youth's academic and everyday functioning and how it may continue to do so beyond high school (Ducharme, 2020; Kellems et al., 2016). Moreover, school psychologists may be able to elaborate on how a student's accommodations on college entrance exams may help them succeed in light of their learning and behavioral deficits (Kellems et al., 2016).

Consequently, school psychologists should be aware that their psychological evaluation can play a large role in helping students with disabilities to obtain their accommodations both in postsecondary education (College Board, n. d.; Educational Testing Service, n. d.). School psychology evaluations may be helpful and of critical importance to students being able to access their accommodations on admittance exams because they contain detailed information on how a youth's disability impacts their learning (Benson et al., 2019; Benson et al., 2020; Ortiz et al., 2010). In comparison to outside-of-school practitioners, comprehensive psychological evaluations by school psychologists provide unique and detailed insights into the educational difficulties faced by prospective college students with disabilities. Evaluations by school psychologists reflect their unique training in educational psychology and learning that outside-of-school practitioners may not have. Additionally, in comparison to outside practitioners, school psychologists have easy access to students' previous school histories, learning challenges, and how they are performing in their current educational environment. Therefore, evaluations completed by school psychologists can be instrumental in saving prospective post-secondary students the time and financial hardship of seeking another evaluation after graduating from high school. The psychological evaluations, reports, and documentation that school psychologists provide and have access to can best help students with disabilities obtain their accommodations in college and on postsecondary admissions exams by:

1. Identifying their current and past limitations in academic skills or cognitive processes that have impacted learning and functioning (Weis et al., 2016).
2. Providing a history of how the student has responded to evidence-based interventions and supports.
3. Noting how long students with disabilities have needed accommodations and supports in school.
4. Advocating for specific accommodations at Committee on Special Education meetings.
5. Helping build students' self-advocacy skills before entering the post-secondary educational environment.

To best support students with disabilities transitioning to post-secondary education, school psychologists can become familiar with guidelines, such as those published by American College Testing, The College Board, the U.S. Department of Justice guidance on Disability Rights, and The United States Department of Education. School psychologists can reference those

organizations' websites for guidance or see the attached appendix for further information to best help students with disabilities.

Finally, although it is not the intention, nor the role, of NYASP to assist post-secondary institutions and testing companies in establishing admissions criteria, NYASP recommends that they engage in equitable assessment and admissions practices for all prospective college students. NYASP has received feedback from past and present students with disabilities being required to obtain additional private psychological evaluations despite being in possession of several consistent past psychological evaluations demonstrating their disability. These requirements by testing companies to have individuals with disabilities obtain additional testing may be cost-prohibitive, stigmatizing, and burdensome to those with impairments (AHEAD, 2020; Lindstrom & Lindstrom, 2017). Therefore, it is suggested that post-secondary institutions and exam companies provide accommodations for students with disabilities that are supported by a previous history of using such accommodations, whether it be in school, at work, or in the community. Moreover, the United States Department of Justice (2014) indicates that postsecondary applicants who submit appropriate documentation showing longstanding challenges as a result of a disability should not be required by testing companies to submit additional documentation. Therefore, NYASP supports the department's statement that "a testing entity should generally accept such documentation and provide the recommended accommodation without further inquiry" (2014, p. 7). Documentation that can assist prospective college students with disabilities in obtaining their accommodations in postsecondary education and on admissions exams include:

- Psychological measures that display consistency in performance throughout the years.
- Records of the student's use of formal public school accommodations through an IEP or Section 504 plan (in K-12 school)
- Records showing the student's use of accommodations in their workplace or in the community.
- Evidence of the student's utilization of previous accommodations on other high-stakes tests, such as the SAT, ACT, GRE, or state civil service exams.
- Documentation of the student's past and current functional limitations from a qualified professional, such as a school psychologist, licensed psychologist, psychiatrist, or medical doctor.
- Personal statements regarding how the youth's disability has impacted them throughout their lifespan

(Lindstrom & Lindstrom, 2017)

Finally, it is important to highlight that previous literature suggests that GPA, personal statements, letters of recommendation, previous publications, and field experiences may hold the same, if not more, weight than a score on a standardized college admissions exam (Akos & Kretchmar, 2017; Grapin et al., 2016; Hall et al., 2017; Rogers & Molina, 2006). According to Grapin et al (2016), colleges and postsecondary programs that rely heavily on standardized tests like the ACT, SAT, or GRE may overlook many highly qualified and diverse candidates who demonstrate great potential to assume leadership roles in fields such as school psychology. Moreover, previous literature and university statements have cited concerns regarding the predictive validity and potential bias of standardized college admissions exams at the undergraduate and graduate levels (Douglass, 2020; Geiser, 2020; Geiser & Studley, 2002; Hall et al., 2017; Mann, 2019; Miller et al., 2019; Moneta-Koehler et al., 2017; Santelices & Wilson, 2010; Sealy et al., 2019). Therefore, in an attempt to limit potential bias and concerns over how standardized college admissions exams are being used, the Educational Testing Service (2020) discouraged the use of cut-scores in determining whether a student is accepted into a program.

In summary, it is NYASP's position that students with disabilities should not have to face more barriers and undue hardship than their non-disabled peers when pursuing their post-secondary goals and when taking college admissions exams. It is best practice for school psychologists to consider the impact that their practices and evaluations will have beyond the four walls of the school building and, if possible, work with postsecondary disability professionals and testing companies to ease the transition. By working together, school psychologists will be in the best position to ensure equitable access to testing accommodations for prospective postsecondary students with disabilities.

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## Appendix

Helpful Resources for Students with Disabilities and School Psychologists,

### American College Testing (ACT)

- The American College Testing is a non-profit that administers the ACT for college admissions, which consists of testing in the areas of English, Math, Social Studies and Natural Sciences. The exam's purpose is to measure general development in one's education and their capability of college success. It is a multiple choice assessment in which the scores provide an indicator of 'college readiness'. Information on disability accommodations for the ACT can be found at: <http://www.act.org/content/act/en/products-and-services/the-act/registration/accommodations.html>

### Association of Higher Education and Disability (AHEAD)

- AHEAD is the leading professional membership association for individuals committed to equity for persons with disabilities in higher education. They provide guidance and support for students with disabilities entering or currently enrolled in postsecondary education and the professionals who work with these students. More specifically, they offer a guidance document to assist students with disabilities and the professionals working with them assistance in obtaining accommodations in college which can be found here: <https://www.ahead.org/professional-resources/accommodations/documentation>

### The College Board

- The College Board is a non-profit that connects students to college success and opportunity. It was created to expand access to higher education by helping students prepare for transition to college through the use of programs and services in college readiness and success. This also includes research and advocacy and is governed by a Board of Trustees. Some students with documented disabilities are eligible for accommodations but must receive approval by the Services for Students with Disabilities (SSD). Criteria includes; a documented disability, participation in a college board exam is impacted, the requested accommodation is needed and the

accommodation(s) is received on school tests. More information can be found on their website at: <https://accommodations.collegeboard.org/?navId=gf-ssd>

#### **United States Department of Justice. (2014)**

- In 2014, the United States Department of Justice put out a guidance document on testing accommodations for students with disabilities. The guidance document addresses the obligations of testing entities that administer exams for application, licensing, certification, and credentialing purposes from secondary to post graduate levels. Detailed information can be found here: [https://www.ada.gov/regs2014/testing\\_accommodations.html](https://www.ada.gov/regs2014/testing_accommodations.html)

#### **United States Department of Education**

- The United States Department of Education has published a document providing detailed guidance on the transition of students with disabilities to postsecondary education. The document provides information on how high school educators, and in particular school psychologists and school counselors, can assist students with disabilities obtain their accommodations and meet the documentation requirements of post-secondary education institutes. In particular the United States Department of Education (2011) notes that “school personnel should be aware that institutions of postsecondary education typically do not accept brief conclusory statements for which no supporting evidence is offered as sufficient documentation of a disability and the need for an academic adjustment. School personnel should also be aware that some colleges may delay or deny services if the diagnosis or the documentation is unclear” (para. 18). The United States Department of Education (2011) *Transition of Students with Disabilities to Postsecondary Education: A Guide for High School Educators* can be found here: [www2.ed.gov/about/offices/list/ocr/transitionguide.html](http://www2.ed.gov/about/offices/list/ocr/transitionguide.html)

#### **The Job Accommodation Network (JAN)**

- Although not mentioned specifically in this position statement, individuals with disabilities and professionals working with them may find the Job Accommodation Network a great resource. JAN is the leading source of free, expert, and confidential guidance on workplace accommodations and disability employment

issues. JAN helps people with disabilities enhance their employability, and shows employers how to capitalize on the value and talent that people with disabilities add to the workplace. The organization offers free one-on-one consultation for people with disabilities in regards to workplace accommodations, the Americans with Disabilities Act (ADA) and related legislation, and self-employment and entrepreneurship options for people with disabilities. Assistance is available both over the phone and online. More information on JAN can be found here: <https://askjan.org/index.cfm>

### **United States Government Accountability Office**

- The U.S. Government Accountability Office (GAO) is an independent, nonpartisan agency that works for Congress. Often called the "congressional watchdog." In 2011, the GAO examined the types of accommodations requested, the factors test companies consider when approving requests, challenges faced by individuals and test companies in receiving and granting accommodations, and how the federal agencies enforce compliance with relevant disability laws and regulations. The GAO recommended that DOJ take steps to develop a strategic approach to enforcement of testing accommodations. The study can be found here: <https://www.gao.gov/assets/590/587367.pdf>