

Practice Document

Assisting Students with Disabilities Transitioning to College and Beyond

College-Bound Students with Disabilities

Over the past few decades, there has been a steady increase of students with disabilities entering college in the United States. According to the National Center for Educational Statistics, 19 percent of undergraduates reported having a disability as of the 2015-16 academic year (Digest of Education Statistics, 2021). This is an increase just from 2011-12, where the percentage of undergraduates who reported having a disability was 11 percent (Digest of Education Statistics, 2016). These statistics are reflective of students who identify as a student with a disability. There might be more college students with disabilities, but may choose not to identify in order to avoid stigma, or who are unaware they are eligible to receive services at the college level (Acquino & Bittinger, 2019)

Despite a steady increase of students with disabilities pursuing postsecondary education, research indicates that this population continues to experience challenges with retention, graduation rates, and involvement in extracurricular activities compared to their peers without self-identified disabilities (Shallish et al., 2017). According to national longitudinal data collected in 2009, only about 40% of college students with disabilities had graduated from a degree program 8 years after completing high school (Newman et al., 2010). Some of the difficulties youth with disabilities encounter en route to college include challenges in time management, organization, sustaining concentration, meeting deadlines, and processing information (Kimball et al., 2016; Lindstrom & Lindstrom, 2017; Schaffer et al., 2021).

Legal Differences Between High School and College

Legal protections for students with disabilities at the K-12 level fall under the Individuals with Disabilities Education Act (IDEA) as well as Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA). After students graduate from high school, individuals with disabilities are only protected by ADA and Section 504. In the college setting, the ADA and Section 504 ensure that students are afforded reasonable accommodations that provide them equal access to their educational environment (Association on Higher Education and Disability [AHEAD], 2020; Lindstrom & Lindstrom, 2017). However, compared to K-12, students at the college level are responsible for self-identifying as a student with a disability in order to receive accommodations and services. A student is not required to disclose disability status during the admissions process. Though policies and practices within higher education are evolving, if students choose to request accommodations, they are generally required to provide documentation

to the college's disability services department that provides information about their disability, functional limitation(s), and need for certain accommodations (U.S. Department of Education, 2011).

Transition-Planning Requirements for Students with Disabilities

New York State has specific transition planning requirements for students with disabilities to promote positive post-secondary outcomes. Transition services are a coordinated set of activities put in place to improve a student's achievement and/or functioning in order to support their progression from school to post-graduation endeavors. The goal of transition planning is to help students identify their post-secondary goals so that opportunities and support can be provided while they are in school to help students achieve their goals. Post-secondary goals may include work and career, continuing education/learning, and community participation.

New York State outlines specific transition requirements. Once the student turns 15 years old, their Individual Education Program (IEP) must include measurable post-secondary goals and recommendations for transition services and activities. The IEP also must be updated annually thereafter. The New York State Education Department (NYSED) indicates the student's IEP must include the following:

- Measurable postsecondary goals in the areas of training, education, employment and, where appropriate, independent living skills. These goals must be based on age-appropriate transition assessments
- The student's needs as they relate to transition from school to post-school activities, including the courses of study to be provided to the student to reach those goals
- Annual goals that document the knowledge/skills the student is expected to achieve that will incrementally prepare them to meet the post-secondary goals
- Transition services/activities the student will need to facilitate their movement from school to post-school activities (NYSED, 2011)

In addition to IEP requirements, transition services also govern the IEP process. Students must be invited to CSE meetings when transition goals and services are to be discussed. Additionally, any agency likely responsible for the provision or payment of transition services must also be invited, with parental consent or student consent if the student is 18 or older. Such entities might include educational, vocational rehabilitation, employment, training, social services, and health services agencies (US Department of Education, 2020). Steps must also be taken by the school to involve responsible agencies who do not attend the meeting.

Federal law requires that, prior to a classified student's exit from school either by graduation or aging out, a student exit summary is established. The exit summary should be developed to help the student access reasonable supports and/or accommodations in postsecondary education, work, the community, and/or as a means of accessing adult services as needed. The exit summary should include student strengths and preferences, skills and abilities, as well as limitations and needs. It should also include recommendations developed to ensure the student's transition to adult functioning in the areas of living, learning, and working.

The following key factors are recommended so that the student's transition is smooth and successful:

- The results of age-appropriate transition assessments provided to the student
- Engagement of the parent and student as partners so that the parents' concerns for the education of their child and the student's needs, strengths, preferences and interests are considered and documented
- Collaboration with participating state and community agencies to provide the student with appropriate services that will assist the student to meet their post-school goals
- Instruction toward the career development and occupational standards (CDOS)
- Opportunities for career development activities, including in-school and out-of-school job training and career and technical education (CTE) coursework in order to enhance employment opportunities and outcomes for the student (NYSED, 2011)

The School Psychologist's Role in Transition-Planning

Given their ability to help children learn, grow, and succeed throughout their lifespan, a school psychologist can be a great ally for prospective college students with disabilities, especially when it comes to assisting them in accessing appropriate 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).

Evaluation Considerations

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). School psychology evaluations may be helpful in showing which, if any, accommodations are needed on admittance exams, because these evaluations contain detailed information on how a youth's disability impacts their learning (Benson et al., 2019; Benson et al., 2020; Ortiz et al., 2010).

Comprehensive psychological evaluations by school psychologists provide unique and detailed insights into the educational difficulties faced by prospective college students with disabilities. School psychologists have 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 any needed 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 evidence-based accommodation decisions at CSE 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 Appendix B for further information to best help students with disabilities.

Lindstrom and Lindstrom (2017) provide documentation that can assist prospective college students with disabilities in obtaining any needed accommodations in postsecondary education and on admissions exams including:

- 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

Other Transition-planning Considerations

Comprehensive evaluations can also serve as an important roadmap for the development of the transition plan to identify skills and competencies the student can develop to promote a smoother transition to college. See appendix A for an example case study of how to support a student with a disability in their journey to college. As noted in Table 1, there are key differences between high school and college with regard to students' legal rights and responsibilities, advocacy, and support. In college, students are responsible for requesting accommodations, asking for help when needed, and developing compensatory learning strategies that work best for them (e.g., time management, study, note-taking skills, use of assistive technology). Further, given that the legal framework for which students are given accommodations changes from high school to college, there is no IEP or 504 Plan in college and their accommodations do not automatically transfer to college (Madaus, 2005). Though colleges are required to engage in an interactive process with the student to

determine accommodations on a case-by-case basis, accommodations granted at the high school level may or may not be considered reasonable and necessary for equal access in college. For example, extended time for assignments (Hamblet, n.d.) and course waivers are not commonly approved accommodations in college.

Table 1. Differences between high school and college for students with disabilities

High School	College
Federal special education law focus on success	Federal anti-discrimination law focus on access
Fundamental modifications of programs and curriculum may be implemented. Manifestation Determination process to address behavioral concerns	All students need to meet the same degree program requirements and technical standards, as well as adhere to the Student Code of Conduct, regardless of disability
The school district provides comprehensive evaluations at no cost for students to receive services	If updated documentation is required to receive services, the student usually needs to obtain an evaluation out of pocket
Parents/guardians and teachers advocate for the student to receive services	Students must disclose a disability and engage in an interactive process to request services
Teachers and support staff provide daily individualized support	The student is responsible for seeking academic assistance from instructors and tutoring centers

Testing Accommodations

Engaging in best practices for the evaluation process is also important for students who plan to take college preparatory and entrance exams. Students who wish to take the PSAT/SAT with accommodations are required to request accommodations with the The College Board. The College Board notes seven basic criteria required for accommodations that include:

- 1) Diagnosis to be clearly stated
- 2) Information is current
- 3) Student’s educational, developmental, and medical history is presented
- 4) Diagnosis is supported
- 5) Functional limitation is described
- 6) Recommendations of accommodations are justified
- 7) Evaluator’s professional credentials are established (College Board, 2022)

The College Board notes that in most cases, if a student is requesting the same accommodations as outlined in a student’s IEP, 504, or other school-based plan, students typically are not required to submit additional documentation (College Board, 2022). Schools and families should note that such information and documentation is necessary to provide accommodations to ensure students

equal access, not to provide an optimal testing environment or outcome (e.g., higher test score). The Educational Testing Service (ETS) and College Board websites provide information for families, evaluators, and schools to guide in the process.

The ETS, the organizational body that produces many standardized tests, notes the crucial role of the evaluator. The ETS notes the following requirements for accommodations:

- Must show impact of disability of a major life activity
- Documentation must include more than the IEP or 504 from high school
- The documentation cannot be limited in scope and content
- The diagnosis cannot be based on a screening or single subtest score
- A clear statement of diagnosis consistent with the DSM
- Clear description of history of disability from childhood and how it relates to current problems with academic performance or employment
- Must include documentation of history of accommodations being requested
- Disability must affect the client in multiple settings.

When college students apply for a graduate program, most are required to take a graduate entrance exam depending on their field of study, such as the GRE, LSAT, MCAT, GMATs. The process for requesting accommodations and documentation requirements vary depending on the exam. However, it is important to note the ETS requirements often include submitting documentation that is no more than five years old for learning disabilities, ADHD, ASD, or ID, and 12-months for psychiatric disabilities and TBI (ETS, 2022). This is likely not problematic while the student is in high school, but may be for students who are applying for graduate-level exams who have not had a comprehensive evaluation in several years, especially for those whose college disability services office did not require this kind of documentation. Out-of-pocket evaluations can be time-consuming and cost-prohibitive.

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 and throughout their degree programs. 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.

Recommendations for School Psychologists and Educators

To assist students in receiving appropriate accommodations on college admissions tests and in college classes, school psychologists can conduct comprehensive psychoeducational evaluations. One component of such evaluations is diagnostic cognitive and achievement testing, which can provide very helpful information regarding accommodation needs as well as information about skills that are relevant in making postsecondary path choices. Evaluations can also document test-related impairment using real-world data, such as teachers' observations of behavior during classroom tests and patterns of classroom test performance with and without accommodations. Both types of data (i.e., from diagnostic testing as well as real-world performance and behavior) will be helpful to external entities, such as testing agencies and colleges, when making later decisions. Of course, some students who have a history of accommodations may be found to no

longer need them; this should be documented as well. The goal should always be to provide accurate, evidence-based conclusions about functional needs.

Since school-based evaluations are done primarily for the purpose of determining current needs in the school setting, some districts may choose not to spare resources for full, comprehensive testing batteries (e.g., every high school senior completing a triennial reevaluation). In this case, families seeking full testing batteries can be directed to resources such as the NYSED Adult Career and Continuing Education Services-Vocational Rehabilitation (ACCES-VR) program or locally available reduced-price evaluations at university training clinics, as well as services from local private practitioners. Depending on the student's disability type, other resources such as those at the New York State Office for People With Developmental Disabilities (OPWDD) may be relevant. Practitioners may find useful the resources at the [National Technical Assistance Center on Transition](#) as well.

When helping students and families with transition planning, school psychologists should know that over the past several years, many colleges have either dropped use of admissions tests or have gone "test optional" (Marcus, 2021). Students and families can be encouraged to look into individual colleges' policies for more details, but this can expand options for students who are unable to do well on these tests, with or without accommodations. In addition, anxiety concerning tests is a common source of pressure during the college application process, but practitioners can implement or direct families to evidence-based interventions for test anxiety (Symes & Putwain, 2020). Successful intervention builds skills that are useful beyond admissions tests, in the college setting and elsewhere.

Appendix A

Mock Case Study

Sonja is an eleventh-grade student at her local public high school. She has been classified as a student with an Other Health Impairment since she was in third grade. She has a diagnosis of ADHD. Sonja is due for a psychological reevaluation this year. She is on her way to attaining a Regents diploma when she graduates this year, and she hopes to attend college, major in criminal justice, and then eventually either attend law school or enter the field of law enforcement.

In preparing for her reevaluation, the school psychologist at Sonja's high school reviews her records and finds that Sonja's scores on measures of intellectual ability have been stable, across previous evaluations. She is passing all of her classes. Her academic test scores from three years ago (which fall in the low 80s for reading and writing, high 80s for math) appear to still be accurate reflections of where she is functioning. In addition, the school psychologist notices that Sonja's current IEP includes supports and services that appear to be appropriate for a student like Sonja. She is currently receiving co-teaching for ELA, social studies, science, and math, as well as a resource room, supplemental aids and services such as frequent reminders to remain on task, preferential seating, extra time for written assignments, access to a calculator for math work, and extra copies of notes and textbooks in case Sonja loses her work. Sonja's IEP also includes testing accommodations: extended time (1.5), small group testing, access to a calculator, and use of a word processor with spell check for written responses.

Knowing that Sonja wants to attend college, and that she will be taking the SAT this spring, the school psychologist decides to update testing with Sonja in order to help her establish eligibility for testing accommodations on the SAT, and also to facilitate her access to accommodations at the college level. The school psychologist knows that she must clearly establish that Sonja has a disability that impacts a major life activity (in this case, learning, studying, test-taking, and work completion), that that diagnosis must be clearly stated and supported with data (and not just a single test score), and that this limitation must be evident for an extended period of time (since childhood), clearly related to current problems that the student is experiencing, and must affect the student in more than one setting.

Therefore, the school psychologist conducts updated psychological testing (IQ and achievement) with Sonja, and also administers behavior rating scales to Sonja, her parents, and several of her teachers. The school psychologist also gathers anecdotal data from Sonja's teachers (report card comments and observations from the "present levels" section of her IEP), and reviews all of Sonja's previous psychological evaluations and IEPs.

The school psychologist triangulates data between sources and raters and writes a report demonstrating that Sonja is an intelligent student (her global IQ falls at the 85th percentile) with excellent basic reading skills (decoding falls at the 80th percentile), but serious deficits in working memory and sustained attention (10th percentile scores) that directly impact Sonja's academic fluency (reading, writing, and math calculation). All raters, including Sonja, describe her attention problems as falling within the clinically significant range (90th percentile or

greater). Sonja's reading comprehension skills are negatively impacted by attention, and fall at the 20th percentile. She has difficulty spelling and composing written responses, and she can express her ideas better orally than in writing. Sonja has difficulty sustaining attention to whole-group instruction without getting distracted (she was about 40% off-task during the classroom observation), does better one-on-one or in small group settings, and she needs extra time to organize her thoughts and complete a rough draft before completing writing assignments. In addition, it appears as if Sonja has consistently demonstrated these difficulties, throughout her educational career, and the school psychologist takes care to refer to previous IEPs and psychological evaluations from elementary and middle school to make that point. For example, Sonja began receiving accommodations on state tests in fourth grade and has used them consistently from fourth grade to the present day. At the end of her report, the school psychologist states conclusively that Sonja continues to have ADHD Attention Deficit Hyperactivity Disorder (predominantly inattentive type), and makes specific, data-based recommendations for supports and accommodations that Sonja needs in high school and in post-secondary settings.

Finally, the school psychologist sits down with Sonja, after the report is written and before the CSE meeting, to review the report in detail, with the goal of helping Sonja understand her disability, her unique strengths and needs, and how to advocate for herself and her rights as a college student with a disability. She also prepares Sonja to participate meaningfully in the upcoming CSE.

Appendix B

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 [this website link](#).

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 [at this website link](#).

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 [this link](#).

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 [on their website](#).

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 on their website](#).

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 on their website](#).

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 the DOJ take steps to develop a strategic approach to enforcement of testing accommodations. The study can be found [here on their website](#).

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