



2015-16 High School Assessment Accommodations Policies: An Analysis of ACT, SAT, PARCC, and Smarter Balanced

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**2015-16 High School Assessment
Accommodations Policies: An Analysis of
ACT, SAT, PARCC, and Smarter Balanced**

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Executive Summary

As required by federal and state legislation, all students, including students with disabilities and English learners (ELs), participate in state assessments used for accountability. Some states use assessments developed by consortia of states (e.g., Partnership for Assessment of Readiness for College and Careers—PARCC, Smarter Balanced Assessment Consortium—Smarter Balanced). States also are required to ensure that graduating students are college- and career-ready (CCR). Some states use state-administrations of the ACT or SAT as their measure of CCR. Many students with disabilities and ELs use accessibility features and accommodations to access each of these assessments.

This report provides a snapshot of how accommodations were included in policies across ACT, SAT, PARCC, and Smarter Balanced during the 2015-16 school year. It also analyzes differences in the accessibility framework, decision-making process, and terminology across the four assessments. Preliminary analyses found that SAT did not have a single accommodations policy, but rather that the policy varied from state to state. Therefore, for this study the SAT accommodations policies of three representative states (i.e., Connecticut, Michigan, New Hampshire) were analyzed.

The accessibility frameworks differed across the four assessments. PARCC and Smarter Balanced had three-tier frameworks (i.e., universal features that any student could use, designated features that any student could use but which an adult must identify in advance, accommodations). The ACT and SAT frameworks focused on whether the scores were college reportable. For state administrations of ACT, and for state administrations of SAT in two states (Michigan, New Hampshire) included in this analysis, accommodation requests had to be approved by the test vendor for them to be college reportable. If not approved the state could still allow the accommodation as a non-reportable or state-allowed accommodation for state accountability or other state uses. In the third state that administered SAT (Connecticut), both college-reportable and state-allowed accommodations were approved by the state.

There was variation across the four tests in how accommodations were included in policies. ACT, PARCC, and Smarter Balanced, as well as one of the SAT states (Connecticut), published lists of accommodations. The other two SAT states (Michigan, New Hampshire) provided examples of accommodations, but did not have set lists. In all cases, students with disabilities with Individualized Education Programs (IEPs) or 504 plans had access to all the accessibility features and accommodations that an assessment made available. Allowances for ELs, and students who were not ELs or who did not have a disability, were much more variable across assessments. ELs could not use college reportable accommodations for ACT or for SAT in Michigan and New Hampshire. For SAT in Connecticut, several college-reportable accommodations were available for ELs. ELs could use accommodations on PARCC; there were no accommodations for ELs on Smarter Balanced. Four accommodations were allowed across all four assessments: braille, calculator, scribe,

and text to speech. Additionally all assessments allowed states and districts to request accommodations that were not on the list.

Given the considerable variability in accessibility and accommodations policies for some of the most frequently used high school assessments, there are several questions that should be asked:

- Are there differences across states in student access to accommodations?
- What is the number and percentage of accommodations requests approved by each group providing assessments?
- What is the number and percentage of accommodations requests approved by states?
 - o Are there demographic differences in the likelihood that a student's accommodations request will be approved?
 - o Are students in some settings and locales less likely to have their accommodations requests approved than students in other settings and locales?

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Overview

During the 2015-16 school year, 25 states used assessments aligned to college- and career-ready standards developed by consortia of states (i.e., Partnership for Assessment of Readiness for College and Careers—PARCC, Smarter Balanced Assessment Consortium—Smarter Balanced) as their accountability assessments (PARCC, 2016; Smarter Balanced, 2016). These assessments covered grades 3-8 and high school. A number of states also began to consider the use of college entrance exams for their high school students. By using college entrance exams such as the ACT and the SAT, it was reasoned that students would both show that they were college and career ready, and earn scores that could provide them entrance to a postsecondary institution. During the 2015-16 school year, 19 states used state-administrations of the ACT or SAT as their measure of college and career readiness (Achieve, 2016a, 2016b).

The participation of students with disabilities in all state- and district-administered assessments is required by the Individuals with Disabilities Education Act (IDEA), which also requires that they be provided accommodations as appropriate. The Elementary and Secondary Education Act (ESEA) confirms the participation requirements for students with disabilities and adds requirements for the participation of English learners (ELs) in state-administered assessments. With the reauthorization of ESEA in 2015, IDEA requirements for reporting on the number of students using accommodations was confirmed; the reauthorization added the requirement that accommodations be provided to ELs for both content and English Language Proficiency (ELP) assessments.

This report provides a snapshot of how accommodations were included in policies across ACT, SAT, PARCC, and Smarter Balanced during the 2015-16 school year. Accommodations increasingly are viewed as a critical aspect of fairness and obtaining assessment results that support valid interpretations. Indeed, the 2014 *Standards for Educational and Psychological Testing* (American Educational Research Association, American Psychological Association, National Council on Measurement in Education—AERA, APA, & NCME, 2014) address the need for students to be provided accommodations to ensure that results accurately reflect what students know and can do, stating:

Scores from the accommodated version of the test must yield inferences comparable to those from the standard version. . . . accommodations by their very nature mean that something in the testing circumstance has been changed because adhering to the original standardized procedures would interfere with valid measurement of the intended construct(s) for some individuals. (p. 59)

The *Standards* also indicated that accommodations were one aspect of access to the construct being measured by an assessment. It noted that:

Accessible testing situations are those that enable all test takers in the intended population, to the extent feasible, to show their status on the target construct(s) without being unduly advantaged or disadvantaged by individual characteristics (e.g., characteristics related to age, disability, race/ethnicity, gender, or language) that are irrelevant to the construct(s) the test is intended to measure. (p. 52)

The *Standards* reflected a paradigm shift that began to emerge with the 2010 funding of the consortia that were developing rigorous, innovative, accessible assessments of college and career readiness. A tiered approach to accessibility emerged from the efforts of the consortia, one that recognized universal features available to all students, features available to some students for whom a need was identified (but not restricted to only those with disabilities), and accommodations.

In 2011 the U.S. Government Accountability Office (GAO, 2011) released a report on protecting students' rights to testing accommodations in higher education. It addressed those tests used for entrance to institutions of higher education, as well as those used for admission to graduate programs and to receive professional certification or licensure. Overall, it concluded that:

Given the critical role that standardized tests play in making decisions on higher education admissions, licensure, and job placement, federal laws require that individuals with disabilities are able to access these tests in a manner that allows them to accurately demonstrate their skill level. While testing companies reported providing thousands of test takers with accommodations in the most recent testing year, test takers and disability advocates continue to raise questions about whether testing companies are complying with the law in making their determinations. (Scott, 2011, p. 29)

In 2015 the U.S. Department of Justice (2015) issued technical guidance that more clearly defined when accommodations needed to be provided for tests. It clarified that the guidance covered “exams administered by any private, state, or local government entity related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes...” (p. 2). It also clarified that documentation requirements should be reasonable, and indicated that the following were sufficient documentation:

- Past testing accommodations on similar standardized exams or high-stakes tests
- Formal public school accommodations (e.g., IEP or Section 504 documented accommodations)
- Documentation from a qualified professional

The Department of Justice guidance also indicated that even if an individual had never received accommodations in the past that did not prevent the individual from receiving an accommodation on an assessment.

When ESEA was reauthorized as the *Every Student Succeeds Act (ESSA)* in 2015, it included new language about the use of locally-selected, nationally-recognized high school academic assessments. These assessments had to be aligned to the State’s academic content standards, address the depth and breadth of the standards, and be equivalent in content coverage, difficulty, and quality to the state-designed assessments. They also had to provide comparable, valid, and reliable data on academic achievement for all students and for each subgroup of students. Before approving any of these assessments, states had to ensure that the use of appropriate accommodations did not deny any student with a disability (or an EL) the benefits of participation in the assessment that were provided to students without disabilities (or who were not ELs).

Purpose

We conducted an analysis of the current accessibility and accommodations policies of ACT, SAT, the PARCC high school assessment, and the Smarter Balanced high school assessment to fill the gap in information about the similarities and differences in their policies. Many states are administering the ACT, SAT, PARCC, and Smarter Balanced exams at the high school level, and students with disabilities and ELs are participating in these assessments. First, we examined the accessibility and accommodations policies of ACT, SAT, PARCC, and Smarter Balanced, then we developed a crosswalk of their approaches. Among the research questions we examined were:

1. What was the accessibility framework during the 2015-16 school year?
2. Which student groups could receive accessibility features and accommodations during the 2015-16 school year?
3. How were accessibility and accommodations decisions made?
4. What was the approval process?
5. What documentation was required?
6. What accommodations may be used on the assessment?

Process Used to Review Policies

Data for this analysis were obtained through the examination and analysis of publicly available information, including accommodations manuals and other policy documents. The manuals and

other policy documents applied to the 2016 test administration of the assessments. They were gathered from websites between March 21 and March 28, 2016. For a list of the documents used in this analysis see Appendix A.

For ACT and SAT, we reviewed documents that addressed accessibility and accommodations for state- and district-administrations of the assessment, or were linked to those documents. College Board (which publishes SAT) and ACT each maintain state-specific websites that state departments of education link to from their own websites. Preliminary analyses found that SAT did not have a single accommodations policy, but rather that the policy varied from state to state. Therefore, for this study the SAT accommodations policies of three representative states (i.e., Connecticut, Michigan, New Hampshire) were analyzed. For the three SAT states, documents included in this analysis were either on the state department of education website or on the relevant state site maintained by College Board. The ACT documents used were on ACT sites. The PARCC and Smarter Balanced policies were each on the respective consortium's site.

The information for each state was compiled and summarized. To examine differences in specific accessibility features and accommodations that can be used for ACT, SAT, PARCC, and Smarter Balanced we compared only those accessibility features and accommodations that were considered to be an accommodation **by at least one** of the assessments included in this analysis. Thus, if one of the assessments considered a tool or feature to be an accommodation, it was included in our analysis even if another of the assessments considered it to be a feature that any student could use. Accessibility tools (for example, highlighting) that were not considered an accommodation for any of the assessments were not included in this crosswalk.

Results

There was wide variation in the accessibility and accommodations policies of ACT, SAT, PARCC, and Smarter Balanced in 2015-16. The results of our analysis are organized as follows: (a) the accessibility and accommodations approach of each assessment; (b) a crosswalk of the approaches of the assessments; and (c) the specific accommodations that were allowed for each of the assessments.

Assessment-Specific Approaches to Accessibility and Accommodations

ACT. ACT's accessibility framework included three types of accessibility features and accommodations:

- ACT-approved accommodations (i.e., college reportable accommodations)
- Non-college reportable accommodations (i.e., state-allowed accommodations)

- Local test arrangements (for example, individual and small group administration, wheelchair accessible room)

For a score to be college-reportable for possible use as an entrance exam for a post-secondary institution, the accommodation must be approved by ACT. ACT-approved (college reportable accommodations) were available only to students with disabilities who have Individualized Education Programs (IEPs) or 504 Plans. ELs do not qualify for ACT-approved accommodations.

For an accommodation to be approved, ACT required that students have a professional diagnosis and an IEP, 504, or other official accommodation plan. The documentation must show that the diagnosed condition substantially limited one or more major life activities, and that the request was appropriate and reasonable for the documented disability. To receive approval, a school had to submit a request to ACT. It was typically submitted using an online tool. The most current test accommodations/services pages from an examinee's IEP, 504 Plan, or official accommodations plan was uploaded into the system. Additionally, depending on the request, the following documentation *may* have been required: a psychoeducational/neuropsychological evaluation, a qualified professional diagnosis, or a complete evaluation. ACT then either approves or does not approve the accommodation.

A state could allow the use of an accommodation that was not approved by ACT (thus, it was considered to be a non-college reportable, i.e., a state-allowed accommodation), and the score was not college-reportable. Both students with disabilities and ELs could use non-college reportable accommodations.

The ACT framework also included local test arrangements. Local test arrangements may be provided without review and approval by ACT for students who have an accommodations plan on file at the school. Schools did not need to seek approval to use local test arrangements, and their use did not affect whether a score is college-reportable.

SAT. SAT's framework included two types of accommodations. As previously described, the SAT accommodations policies differed across states. The two types of accommodation in the three states included in this analysis were:

- College reportable accommodations (Connecticut) / College Board accommodations (Michigan, New Hampshire)
- State-allowed accommodations

There was wide variation in the accommodations approval process across the three SAT states. In Connecticut, the school submitted accommodation requests to the College Board. If there were questions about whether any accommodation should be approved as a college reportable accommodation, the request was forwarded to the state for a final decision. Other accommoda-

tions were state-allowed (non-college reportable) accommodations. In Connecticut, both students with disabilities and ELs could use college reportable accommodations. In contrast, in Michigan and New Hampshire, SAT made the final decision about which accommodations were college reportable (i.e., College Board accommodations), and only students with disabilities qualified for college reportable accommodations. ELs had access only to state-allowed accommodations in Michigan and New Hampshire.

The SAT accommodations documentation process also differed across the three states included in this analysis. In Connecticut, the state and College Board published accommodations guidelines that the IEP, 504, or EL team used to make informed decisions. The accommodations guidelines included a list of accommodations that indicated which ones were allowed for a college reportable score and which ones could be used only as state-allowed accommodations. The IEP, 504 plan, or EL plan was considered sufficient documentation. This documentation was submitted to the College Board for review. In Connecticut, whenever there were questions about whether the documentation was sufficient, it was forwarded to the state for a final decision.

In Connecticut if a student needed an accommodation not listed in the policy, a request could be submitted to the state for a unique (other) accommodation. The state determined whether the accommodation would be allowed; Connecticut and the College Board jointly determined whether an approved unique accommodation was a college reportable accommodation or a state-allowed accommodation.

In Michigan and New Hampshire, there was not a set list of accommodations, and the accommodations included in guidelines were merely examples of accommodations. In both Michigan and New Hampshire documentation had to be provided to the College Board. Both states' policies indicated that the disability must have a functional impact for the student to receive an accommodation and that the documentation must show the need for a specific accommodation. Both states stressed the importance of submitting a comprehensive IEP or 504 plan to the College Board, one that clearly showed that the student had a disability. College Board made the final accommodations decisions in both Michigan and New Hampshire.

PARCC. PARCC's framework included three types of accessibility features and accommodations:

- Features for all students
- Accessibility features identified in advance
- Accommodations

PARCC published a list of accessibility features and accommodations that IEP, 504 plan, and EL plan teams (or individual decision makers) used to make accessibility decisions. All students could use the features that were universally available—that is, *features for all students* (for

example, highlighting). Any student could also use *accessibility features identified in advance*. These features needed to be identified prior to administration of the assessment by an adult so that they could be activated. *Accommodations* were available to students with disabilities and ELs. Many of the features and accommodations were embedded in the assessment's online platform, although some were not (for example, small group testing, time of day, and frequent breaks were non-embedded administrative considerations available to all students). A technology-based tool called the Personal Need Profile (PNP) was completed by school personnel to document which accommodations and accessibility features identified in advance were selected.

If a student needed an accommodation that is not listed in the PARCC policy, a request could be submitted to the state for a unique (other) accommodation. Unique accommodations were provided on an individual basis, and the state was the final decision maker (i.e., it either approved or did not approve the unique accommodation request).

Smarter Balanced. Smarter Balanced's framework included three types of accessibility features and accommodations:

- Universal tools
- Designated supports
- Accommodations

Smarter Balanced published a list of accessibility features and accommodations that IEP, 504 plan, and EL plan teams (or individual decision makers) used to make accessibility decisions. All students could use *universal tools* that were available to all students (for example, highlighting), as well as *designated supports* listed in the Smarter Balanced policy if the need for them was identified by an adult or team of adults. *Accommodations* were available only to students with disabilities. Many of the universal tools, designated supports, and accommodations were embedded in the assessment's online platform, though there also were non-embedded accessibility features and accommodations (for example, breaks, English dictionary, scratch paper, and thesaurus are non-embedded universal tools). A technology-based tool called the Individual Student Assessment Accessibility Profile (ISAAP) was completed to document which accommodations and designated supports were selected.

Additionally, if a student needed an accommodation that was not listed in the Smarter Balanced policy, a request could be submitted to the state for a unique (other) accommodation. The state either provided temporary approval or did not approve the accommodation request. If the accommodation received temporary approval, the state then forwarded it to a Smarter Balanced standing committee that makes a recommendation to the state Governing Members about whether to incorporate the accommodation in future Smarter Balanced guidelines.

Crosswalk of Accessibility and Accommodations Approaches

Accessibility frameworks. Table 1 shows the accessibility and accommodations framework used by each of the assessments. As previously described, ACT and SAT had an accessibility and accommodations framework that differentiated *college reportable* accommodations from other accommodations (*non-reportable* or *state-allowed*). ACT also allowed *local test arrangements* that did not need to be approved by ACT (e.g., wheelchair accessible room, seating near the front of the room, etc.); these were available to students with disabilities. The two assessment consortia (i.e., PARCC, Smarter Balanced) had three-level accessibility frameworks that differentiated among tools for all students, tools for some students (defined by an adult or in advance), and tools considered accommodations for specific groups of students.

Table 1. Accessibility Frameworks of ACT, SAT, PARCC, and Smarter Balanced

Assessment	Universal Features	Designated Features	Accommodations
ACT	No	No	Yes 1 – College Reportable (ACT Approved) Accommodations 2 – Non-College Reportable (State Allowed) Accommodations 3 – Local Test Arrangements
SAT – Connecticut (CT)	No	No	Yes 1 – College Reportable (State Approved) Accommodations 2 – Non-College Reportable (State Allowed) Accommodations
SAT – Michigan (MI)	No	No	Yes 1 – College Reportable (College Board Approved) Accommodations 2 – Non-College Reportable (State Allowed) Accommodations
SAT – New Hampshire (NH)	No	No	Yes 1 – College Reportable (College Board Approved) Accommodations 2 – Non-College Reportable (State Allowed) Accommodations
PARCC	Yes Features for all Students	Yes Accessibility Features Identified in Advance	Yes Accommodation
Smarter Balanced	Yes Universal Features	Yes Designated Supports	Yes Accommodation

Note: The terms used for the columns in the table are general terms suggested by Shyyan, Thurlow, Christensen, Lazarus, Paul, and Touchette (2016) in the *CCSSO Accessibility Manual: How to Select, Administer, and Evaluate Use of Accessibility Supports for Instruction and Assessment of All Students*.

Student groups. Table 2 shows the student groups that had access to the accessibility features and accommodations available in each of the assessments. This table reveals variability not only across assessments, but also for the SAT in different states. In all cases, students with disabilities (with IEPs or 504 plans) had access to all the accessibility features and accommodations that an assessment made available. Allowances for ELs and students who are not ELs or do not have a disability were much more variable across assessments. ELs could not use college reportable accommodations for the ACT or for the SAT in Michigan and New Hampshire. In Connecticut for the SAT, several college-reportable accommodations were available for ELs. ELs could use accommodations on PARCC; there were no accommodations for ELs on Smarter Balanced.

Table 2. Student Groups Access to Accessibility Supports Provided by ACT, SAT, PARCC, and Smarter Balanced

Accessibility Framework	Students with Disabilities (IEP/504)	English Learners	Students Who Do Not Have a Disability and are Not ELs
Universal Features	PARCC Smarter Balanced	PARCC Smarter Balanced	PARCC Smarter Balanced
Designated Features	PARCC Smarter Balanced	PARCC Smarter Balanced	PARCC Smarter Balanced
Local Test Arrangements	ACT		
Accommodations – All	PARCC Smarter Balanced	PARCC	
Accommodations – College Reportable	ACT SAT-CT/MI/NH	SAT-CT	
Accommodations – State allowed	ACT SAT-CT/MI/NH	ACT SAT-CT/MI/NH	

Approval Process and Documentation. Table 3 provides a summary of the accommodations approval process for ACT, SAT-CT/MI/NH, PARCC, and Smarter Balanced. For additional details, see Appendix B.

For ACT, and for the SAT in two states (Michigan and New Hampshire), accommodation requests had to be approved by the testing organization for them to be college reportable; if not approved, the state could still allow the accommodation as a non-college reportable (state allowed) accommodation. In the third state that administered the SAT (Connecticut), both college-reportable and state-allowed accommodations were approved by the state. In the two assessment consortia (i.e., PARCC, Smarter Balanced), schools selected accommodations (e.g., IEP teams, 504 teams) from a list. For some accommodations not included in the consortia’s written policies, the state must be asked to approve them.

Table 3. Approval Process and Documentation

Assessment	Accessibility Framework	Approval Process
ACT	1. College reportable	IEP or 504 plan team decides which accommodations are needed; school submits request including documentation of disability and need to ACT (including the most current test accommodations/services pages from IEP/504 Plan/official accommodations plan, and if required for a requested accommodation, additional documentation); ACT approves or does not approve accommodation. If an application is not approved, school may resubmit application with additional information. ACT makes final decision.
	2. Non-college reportable (State-allowed)	State may allow accommodations not approved by ACT as non-college reportable (state-allowed).
	3. Local test arrangements	School does not need to seek approval to use.
SAT – CT	1. College reportable	IEP, 504 plan, or EL plan team decides which accommodations are needed; school submits request; College Board reviews request. If there are questions about whether a request should be approved, it is forwarded to state for final decision. School may resubmit previously declined request. State and College Board both review resubmissions; state makes final decision.
	2. Non-college reportable (State allowed)	School requests; state makes final decision.
SAT – MI	1. College Board accommodations	IEP or 504 plan team decides which accommodations are needed; school submits request to College Board; College Board approves or does not approve. If not approved, school may resubmit with additional information. College Board makes final decision. State may allow accommodations not approved by College Board as state-allowed (Non-college reportable).
	2. Non-college reportable (State allowed)	School requests; state makes final decision.
SAT - NH	1. College Board accommodations	IEP or 504 plan team decides which accommodations are needed; School submits request to College Board; College Board approves or does not approve. If not approved, school may resubmit with additional information. College Board makes final decision. State may allow accommodations not approved by College Board as state-allowed (Non-college reportable).
	2. Non-college reportable (State allowed)	School requests; state makes final decision.
PARCC	1. Features for all students	Student makes decision.
	2. Accessibility features selected in advance	School makes decision; for students with IEPs or 504 plans, or who are ELs; IEP/504/EL team decides.
	3. Accommodations	IEP, 504, or EL team decides; state makes final decision for some accommodations (i.e., unique accommodations).

Table 3. Approval Process and Documentation (continued)

Assessment	Accessibility Framework	Approval Process
Smarter Balanced	1. Universal tools	Student makes decision.
	2. Designated supports	School makes decision. For students with IEPs, or 504 plan IEP or 504 team decides.
	3. Accommodations	IEP or 504 team decides; state makes final decision for some accommodations (i.e., unique accommodations).

Score Uses. Table 4 shows how the use of accessibility features and accommodations affected the use of scores. For ACT and SAT, as indicated by the names of the accommodations categories, if a student used college reportable accommodations or local test arrangements the score could be used for college admissions. They could also be used for state accountability and other state uses. The SAT and ACT scores of students who used non-college reportable (state-allowed) accommodations could be used for state accountability and other state uses, but not for college admissions purposes. The scores of PARCC and Smarter Balanced assessments were used primarily for accountability and other state uses. Additionally, some colleges and universities accepted PARCC and Smarter Balanced scores (including those of students who used accessibility features and accommodations) as a measure of college readiness, treating the results as they would an entrance exam.

Table 4: Score Uses: ACT, SAT, PARCC, and Smarter Balanced

Assessment	Accessibility Feature/Accommodation	Score Uses	
		College Admissions	State Accountability/ Other State Uses
ACT	1. College reportable	X	X
	2. Non-college reportable (State-allowed)		X
	3. Local test arrangements	X	X
SAT – CT	1. College reportable	X	X
	2. Non-college reportable (State allowed)		X
SAT – MI	1. College Board accommodations	X	X
	2. Non-college reportable (State allowed)		X
SAT - NH	1. College Board accommodations	X	X
	2. Non-college reportable (State allowed)		X
PARCC	1. Features for all students	X ¹	X
	2. Accessibility features selected in advance	X ¹	X
	3. Accommodations	X ¹	X

Table 4: Score Uses: ACT, SAT, PARCC, and Smarter Balanced (continued)

Assessment	Accessibility Feature/Accommodation	Score Uses	
		College Admissions	State Accountability/ Other State Uses
Smarter Balanced	1. Universal tools	X ¹	X
	2. Designated supports	X ¹	X
	3. Accommodations	X ¹	X

¹Some colleges and universities use student performance on the PARCC and Smarter Balanced assessment as a measure of college readiness.

Specific Accommodations Policies

There was wide variation across ACT, SAT, PARCC, and Smarter Balanced in what was considered an accommodation. Some features and tools that were universally available (or accessibility features that could be selected in advance) on one assessment were considered an accommodation on another—or not allowed at all. For detailed information about the accommodations see Appendix C.

Table 5 provides a summary of the accommodations allowed on the ACT, SAT, PARCC, and Smarter Balanced assessments. This table does not include any accommodations for SAT in Michigan or New Hampshire because the accommodations included in the policies for those states were considered examples rather than a list of accommodations. It does not include any accessibility feature that was not considered an accommodation by at least one assessment. It also does not include the ACT local test arrangements or non-college reportable accommodations. For example, magnification was considered an accommodation by SAT-CT, a universal feature available to all students by PARCC, a feature that must be identified in advance (designated support) by Smarter Balanced, and was not mentioned in the ACT policy; therefore it is listed in Table 5 as an accommodation just for SAT-CT.

Braille, calculator, scribe, and text to speech were accommodations for all four of the assessments. In addition, all four assessments allowed other unique accommodations to be requested. There were six additional accessibility features that were considered accommodations by three of the four assessments (i.e., *extended time, large print, multiplication table, speech to text, human reader/read aloud, tactile graphics*).

Table 5. Accommodations Summary

Assessment	Accommodation
ACT, SAT-CT, PARCC, Smarter Balanced	Braille Calculator ¹ Scribe ² Text to speech ³ May request other accommodations
ACT, SAT-CT, PARCC	Extended time Large print
SAT-CT, PARCC, Smarter Balanced	Multiplication table Speech to text
ACT, PARCC, Smarter Balanced	Human reader (read aloud) ⁴ Tactile graphics
ACT, SAT-CT	Audio-recording (DVD/MP3) Computer ⁵ Noise buffers Signed exact English
PARCC, Smarter Balanced	Assistive technology ⁶ Closed captioning ⁷ Paper-based version Sign language – America Sign language ⁸
ACT, PARCC	Monitor test response
SAT-CT, Smarter Balanced	Abacus
SAT-CT, PARCC	Read directions in student’s native language Sign test directions (human signer onsite)
ACT	Adaptive/specialized equipment or furniture Audio amplification Breaks Keyboard navigation Large block answer sheet Multiple days Sign language – cued speech Special lighting Standing, walking, pacing
SAT-CT	Assistive technology compatible test form Color overlays Magnification Small group administration Written directions in language other than English
PARCC	Bilingual dictionary Clarify directions in student’s native language Record answers in test booklet Sign language—unspecified language Student reads assessment to themselves Translation Word prediction—external device

Table 5. Accommodations Summary (continued)

Assessment	Accommodation
Smarter Balanced	Print on demand Streamline ⁹

Note: This list does not include SAT-MI and SAT-NH because the policies for those states did not list actual accommodations (i.e., they only included examples of accommodations).

¹ACT–Talking calculator; SAT-CT–Specialized calculator, 4-function calculator on non-calculator sections; PARCC - Use of non-embedded calculator device allowed in grades 6-8 and High School on calculator sections of math assessment. May also be used as an accommodation on the non-calculator sections at all grade levels; Smarter Balanced–Non-embedded calculator is an accommodation that may be used only for calculator-allowed items, grades 6-8, 11

²Smarter Balanced–ELA writing

³ACT–Screen reader or DVD audio-recording; SAT-CT: CB MD3 audio; PARCC–ELA assessment; Smarter Balanced–ELA reading passages

⁴PARCC–ELA; Smarter Balanced–ELA reading passages.

⁵ACT–Computer to write essays and short-answer responses for paper testing only.

⁶PARCC–Listed in policy as “Assistive Technology (Non-screen Reader);” Smarter Balanced–Alternate response options include adapted keyboards, large keyboards, StickyKeys, MouseKeys, FilterKeys, adapted mouse, touch screen, head wand, and switches

⁷Smarter Balanced–ELA listening items

⁸PARCC–ELA; Smarter Balanced–Math and ELA listening items

⁹Smarter Balanced streamline accommodation is an alternate, simplified format in which all items are displayed below the stimuli.

Discussion

In 2015-16, wide variation in approaches and policies was evident across ACT, SAT, PARCC, and Smarter Balanced. Although the IEP team and 504 decision makers were involved in making decisions for all of the assessments, for ACT, and for SAT in Michigan and New Hampshire, the group providing the assessment was the final decision maker. For the SAT in Connecticut, accommodations requests were made to SAT, but the state was the final decision maker. For PARCC and Smarter Balanced, the IEP team or 504 decision maker was responsible for accommodations decisions, with the state being the final decision maker for some accommodations that were not included in the consortia’s policies.

There also was variation across the assessments in how ELs were included in the accessibility and accommodations policies. For SAT in Connecticut, there were some accommodations that ELs could use that did not compromise the college-reportability of the scores. PARCC also had accommodations that ELs may use. Any use of accommodations by ELs in Michigan and New Hampshire resulted in non-college reportable scores. Smarter Balanced did not have accommodations for ELs.

This analysis strongly indicates that there is a need for more research. Questions that need to be addressed include:

- Are there differences across states in student access to accommodations?
- What is the number and percentage of accommodations requests approved by each group providing assessments?
- What is the number and percentage of accommodations requests approved by states?
 - o Are there demographic differences in the likelihood that a student’s accommodations request will be approved?
 - o Are students in some settings and locales less likely to have their accommodations requests approved than students in other settings and locales?

Accessibility features and accommodations play an important role in providing meaningful access to assessments for students with disabilities, ELs, and ELs with disabilities. They enable students to show what they know and are able to do. As many states shift over time in the assessments they use for accountability and as a measure of college- and career-readiness, accommodations frameworks and policies may change. It is anticipated that test developers will continue to grapple with many complex concerns and requirements related to accommodations. It will be vital to periodically revisit accessibility and accommodations policies to see if processes and procedures—and the accommodations themselves—change over time.

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Appendix A

Documents Used in Analysis

ACT

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Appendix B

Documentation Requirements

Assessment	Documentation Requirements	How Accommodations are Presented
ACT	<p>Upload the most current test accommodations/services pages from the examinee’s IEP, 504 Plan, or official accommodations plan. In addition this documentation may be required:</p> <ul style="list-style-type: none"> • A psychoeducational/neuropsychological evaluation • A qualified professional diagnosis • A complete evaluation 	List of accommodations
SAT – Connecticut	IEP, 504, or EL team make decisions for students with disabilities. Required documentation: IEP, 504 Plan, or EL Plan	List of accommodations
SAT – Michigan	<p>Students must have a documented disability to be approved for College Board accommodations that result in college reportable scores. College Board requests information from the school to help ascertain a student’s needs in order to make sure that students with disabilities can take the exam with the accommodations they need.</p> <p>When submitting documentation, including IEP and 504 plans, please be sure it is comprehensive and provides information to answer the following questions:</p> <ul style="list-style-type: none"> • Student must have a documented disability (“Who”) • Functional impact needs to be demonstrated (“How”) • The mere presence of a disability does not necessarily mean a student requires testing accommodations on College Board tests. • The submitted documentation must show the need for the specific accommodation being requested (“Why”) 	<p>Examples</p> <p><i>Language in policy:</i> no set list</p>
SAT – New Hampshire	<p>Functional impact needs to be demonstrated. The presence of a disability does not necessarily mean student needs testing accommodations. <u>Student needs on a test, such as the SAT, may differ from the need in school.</u> [emphasis in original]. Must show need for the specific accommodation being requested.</p> <p>When submitting documentation, including IEP and 504 plans, please be sure it is comprehensive and provides information to answer the following questions:</p> <ul style="list-style-type: none"> • Student must have a documented disability (“Who”) • Functional impact needs to be demonstrated (“How”) • The mere presence of a disability does not necessarily mean a student requires testing accommodations on College Board tests. 	<p>Examples</p> <p><i>Language in policy:</i> no set list; example only, does not represent all accommodations</p>

Assessment	Documentation Requirements	How Accommodations are Presented
PARCC	IEP, 504 plan, or EL plan provides the documentation for accommodations. Accommodations, as well as accessibility features that must be activated in advance, are also documented in Personal Needs Profile (PNP) (or other state process) that is used to request activation of these tools/features in online system.	List of accommodations
Smarter Balanced	IEP or 504 plan provides the documentation for accommodations. Accommodations, as well as designated supports that must be activated in advance, are also documented in Individual Student Assessment Accessibility Profile (ISAAP) (or other state process) that is used to request activation of these tools/features in online system.	List of accommodations

Appendix C

Specific Accommodations

Table C-1 includes only those accessibility features that were considered to be an accommodation **by at least one** of the assessments (i.e., ACT, SAT, PARCC, Smarter Balanced) included in this analysis. For example, an accessibility tool such as highlighting that was not considered an accommodation by any of the test organizations was not included in this list.

Since SAT has different accommodations policies in different states, each of the three representative states included in this analysis are listed separately. It should be noted that the policy of SAT-Connecticut (CT) includes a list of accommodations. The policies of SAT-Michigan and SAT-New Hampshire provide “examples” of accommodations. The examples are included in this table.

The following codes are used in this table:

X = accommodation

NCR = non-college reportable accommodation (state-allowed accommodation) (This code was used only for ACT and SAT for accommodations which were listed in the policy as non-college reportable. In addition, to accommodations labeled NCR, ACT and SAT accommodations marked with an “X” were non-college reportable if approval was not received.)

U = universally available accessibility feature

I = identified in advance accessibility feature available to any student

L = local test arrangement (This code was used only for ACT.)

Table C-1: Accommodations: ACT, SAT, PARRC, and Smarter Balanced

	ACT	SAT-CT	SAT-MI	SAT- NH	PARCC	Smarter Balanced
List of accommodations/examples	List of accommodations ¹	List of accommodations	Examples	Examples	List of accommodations	List of accommodations
Accommodation						
Abacus		X				X
Adaptive/specialized equipment or furniture	X				U	
Assistive technology			X	X ²	X ³	X ⁴
Assistive technology compatible test form		X	X	X		

	ACT	SAT-CT	SAT-MI	SAT- NH	PARCC	Smarter Balanced
Audio amplification	X ⁵			X	U	U ⁶
DVD/MP3 audio- recording	X ⁷	X	X	X		
Bilingual dictionary		NCR ^{8,9}		NCR ^{8,9}	X ⁸	I ^{8,10}
Braille	X ^{11,12}	X	X	X	X ¹³	X ¹⁴
Breaks	X		X	X	U	U
Calculator	X ¹⁵ , U ¹⁶	X ^{17,18} , U ¹⁹	X ^{17,18} , U ¹⁹	X ¹⁸ , U ¹⁹	X ²⁰ , U ²¹	X ²² , U ²¹
Clarify directions in student's native lan- guage					X ⁸	
Clarify/paraphrase directions				NCR		
Closed captioning					X	X ²³
Color overlays	L	X			I	I
Computer	X ²⁴	X	X	X	U ²⁵	U ²⁵
Extended time	X ²⁶	X ²⁷	X	X	X	U ²⁸
Food/medication for individuals with medi- cal need	L		X	X		
Highlight					U	U
Human reader (read aloud)	X		X	X	X ²⁹ , I ³⁰	X ³¹ , I ³²
Individual administra- tion	L		X	X	U ³³	I ³⁴
Keyboard navigation	X					
Large block answer sheet	X		X	X		
Large print	X	X	X	X ³⁵	X	
Magnification		X	X	X	U	I
Monitor test response	X				X ³⁶	
Multiple days	X					
Noise buffers	X ³⁷	X			U ³⁸	I
Multiplication table		X		X	X	X ³⁹
Paper-based version	U ⁴⁰				X	X ^{41,42} , U ⁴³
Preferential seating	L				U	I
Print on demand						X
Read directions in stu- dent's native language		X ⁸		NCR	X ⁸	

	ACT	SAT-CT	SAT-MI	SAT- NH	PARCC	Smarter Balanced
Record answers in test booklet	L			X	X ⁴⁴	
Screens to block out distractions						
Scribe	X	X	X	X	X	X ⁴⁵ , I ⁴⁶
Separate setting or location	X ⁴⁷	X		X	U	I
Sign language—American Sign Language (ASL)		NCR ⁴⁸		NCR ⁴⁸	X ^{29, 49,50, 30,50}	X ⁵¹
Sign language—Cued Speech	X ⁵²					
Sign language (unspecified language)—responses		NCR ⁵³			X	
Sign language (unspecified language) – test content		NCR ⁵³			X ^{29, 49,54, 30,54}	
Sign test directions (human signer onsite)	L	X ⁵⁵		X	X	
Signed Exact English	X ⁵⁶	X		X ⁵⁷		
Small group administration	L	X	X		U	I ³⁴
Special acoustics						
Special lighting	X					
Speech to text		X ⁵⁸	X	X	X	X
Standing, walking, pacing	X					
Streamline ⁵⁹						X
Student reads assessment to themselves					X	
Tactile graphics	X				X	X
Tape recorder						
Text to speech	X ⁶⁰	X ⁶¹	X ⁶¹	X ⁶¹	X ^{29, 30} , I ³⁰	X ³¹ , I ³²
Time of day				X	U	
Translation					X ^{8,62}	I ^{8,63}
Visual notification of remaining time	L					
Word prediction external device					X ⁶⁴	

	ACT	SAT-CT	SAT-MI	SAT- NH	PARCC	Smarter Balanced
Wheelchair accessible room	L					
Written directions in language other than English		X ⁶⁵				
Written version of verbal instructions	L					
May request other accommodations	X	X	X	X	X	X

¹ Many ACT accommodations are listed in the policy as **both** ACT-approved accommodations and Non-college reportable accommodations. If ACT does not approve a request, the accommodation may still be used, but the score becomes non-college reportable.

² Requests for assistive technology considered individually; reportability dependent on nature of device required.

³ A PARCC accommodation is Assistive Technology (Non-screen Reader). Under the specifications it says, "During Testing: Students may use a range of assistive technologies on the PARCC assessments, including devices that are compatible with the PARCC online testing platform, and those that are used externally on a separate computer."

⁴ Alternate response options includes adapted keyboards, large keyboards, StickyKeys, MouseKeys, FilterKeys, adapted mouse, touch screen, head wand, and switches.

⁵ Modified acoustics (FM system).

⁶ The only place amplification is mentioned in the Smarter Balanced policy is under the recommendations for American Sign Language.

⁷ DVD includes audio of the directions, test questions, and response choices.

⁸ For English learners (ELs), including ELs with disabilities.

⁹ Non-college reportable score when bilingual dictionaries: word-to-word translation are used.

¹⁰ For use with ELA-performance task full writes.

¹¹ Braille, brailler.

¹² English braille, American Education (EBAE).

¹³ Refreshable braille display with screen reader version for ELA/literacy and hard copy braille edition. Also braille note-taker and braille writer.

¹⁴ Includes braille note-taker and braille writer accommodations.

¹⁵ Talking calculator must be approved in advance.

¹⁶ Approved calculators may be used by all test participants.

¹⁷ 4-function calculator on non-calculator sections.

¹⁸ Specialized calculator.

¹⁹ Approved calculators may be used by all test participants on calculator sections.

²⁰ Use of non-embedded calculator device allowed in grades 6-8 and High School on calculator sections of math assessment. May also be used as an accommodation on the non-calculator sections at all grade levels.

²¹ Embedded calculator is universally available for calculator-allowed items.

²² Non-embedded calculator is an accommodation that may be used only for calculator-allowed items, grades 6-8, 11.

²³ Closed captioning is an accommodation for ELA listening items.

²⁴ Computer to write essays and short-answer responses for paper testing only.

²⁶ Assessment is administered online.

²⁶ Several specific extended time options are listed in the ACT online accommodations request tool: (1) double time (over multiple days); (2) triple time (over multiple days); (3) time-and-a-half, self paced (one session, one day); (4) time-and-a-half (over multiple days); (5) extended time on essay/constructed response only.

²⁷ For English learners who *do not* have a disability, the score is non-college reportable when there is a time extension.

²⁸ Smarter Balanced assessments are not timed tests.

²⁹ ELA assessment.

³⁰ Math assessment.

³¹ ELA reading passages.

³² Math assessment and ELA items (not reading passages).

³³ Not listed; implied that it is included in the Separate or Alternate Location accommodation.

³⁴ Individual and small group administrations not considered an accommodation (i.e., listed in the explanations of how to provide some of the other accommodations).

³⁵ Magnifying device cannot be connected to internet or able to record images.

³⁶ Test administrator monitors student placement of response; Available only for the paper-based version.

³⁷ Background music/noise buffers (auditory calming).

³⁸ Headphones.

³⁹ Grade 4 and above math items.

⁴⁰ ACT is shifting to computer-based assessment. Writing section is paper-based.

⁴¹ Print on demand is used to provide this accommodation.

⁴² A paper-based edition of the mathematics assessment in Spanish (or other translated languages as needed) for ELs, including ELs with disabilities. (There is also online Spanish version of the mathematics assessment.)

⁴³ Universally available in some locales. Smarter Balanced offers both online and paper-based versions of the assessment.

⁴⁴ Available only for the paper-based version.

⁴⁵ ELA writing.

⁴⁶ ELA non-writing items and math items.

⁴⁷ Administration from home or care facility; Examinee confined to home or hospital.

⁴⁸ Sign the Reading and Writing assessments in ASL; Student responds in ASL.

⁴⁹ A human signer may be used to transcribe student responses.

⁵⁰ American Sign Language (ASL) video.

⁵¹ American Sign Language (ASL) is an embedded accommodation for ELA listening items and math items.

⁵² Cued Speech (i.e., providing visual phonemic access to the sound of the words using the official set of phonemic sounds) of test items.

⁵³ Sign language for test content or student response.

⁵⁴ Sign interpretation provided by a human signer.

⁵⁵ Directions may be signed in American Sign Language (ASL) or Signed Exact English (SEE).

⁵⁶ Exact English Signing (EES) of test items allowed.

⁵⁷ Exact English signing (EES) may be allowed if student has both a reading and a hearing impairment; students may respond in EES.

⁵⁸ Voice recognition software (CB assistive technology).

⁵⁹ Streamline accommodation is an alternate, simplified format in which all items are displayed below the stimuli.

⁶⁰ Screen reader or DVD audio-recording.

⁶¹ Text-to-speech for all test content (i.e., CB MD3 audio).

⁶² A paper-based edition of the mathematics assessment in Spanish (or other translated languages as needed).

⁶³ Glossary and stacked translations available for Math assessment.

⁶⁴ Word Prediction External Device is an accommodation.

⁶⁵ Written directions in Spanish, Arabic, Portuguese, Polish, Mandarin, or Haitian Creole.

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