



The Collaboration to Promote Self-Determination (CPSD) is an advocacy network of national disability organizations committed to empowering citizens living with complex disabilities and significant support needs to live, work, and be a part of our communities. Through the pursuit of high-impact, innovative public policy reform, CPSD advocates for full inclusive education practices that benefit all students.

CPSD appreciates the opportunity to provide comments on the PARCC Draft Policies on Reading Access Accommodations & Calculator Accommodations for Students with Disabilities. Many of the students with intellectual and developmental disabilities educated by the states in the PARCC consortium should be able to take the general assessment rather than an alternate assessment based on alternate academic achievement standards (AA-AAS) because they are not the students with the MOST significant cognitive disabilities. For years after the 2003 regulations on the AA-AAS were finalized, too many of these students were placed in the AA-AAS because the state's general assessment was not accessible even with accommodations. Eventually, the alternate assessment on modified academic achievement standards (AA-MAS) provided another option for some of these students, but that option is being phased out. The students who are currently in the AA-MAS are supposed to be transitioned to the new general assessments. The U.S. Department of Education's reference to Universal Design for Learning in its application template for the Race to the Top (RTTT) Assessment Grant Program gave us hope that finally we would see models for truly accessible general assessments.

In the application that won PARCC an RTTT assessment grant, PARCC made a commitment to universally design its assessment at every stage. It would be helpful if PARCC would clarify whether they are in fact committed to use UDL principles or to some other use of the term "universal design." The primary focus of UDL, as it applies to assessments, is to eliminate all construct irrelevant barriers to physical and cognitive access so students can demonstrate skills and knowledge. PARCC seems to make this point when it stated its strong agreement with the National Accessible Reading Assessment "that with careful planning and hard work, there should be no trade-off between accessibility and validity." PARCC's RTTT assessment grant application gave the following examples for building multiple, flexible supports into each item and task, provided the construct validity is maintained:

"For example, audio files could be presented in text or image formats or with signing avatars, video can include closed captioning or rich description, text-to-speech and screen readers can provide auditory access to item content, and multiple language dictionaries can be made available for vocabulary support."

In light of all the language regarding “universal design” and accessibility in the PARCC grant application, it is puzzling that its proposed reading access and calculator accommodation policies are so restrictive that they seem to limit accessibility for many students with disabilities. PARCC has a long list of “embedded accessibility supports” that are being considered. It is difficult to comment in an informed way about what accommodations should be available to a small few without knowing which supports will be embedded and available to all students. We have to assume that the accommodations in the draft policies will not be embedded for the subject areas being discussed.

One of the criteria for receiving a reading access accommodation is that the student receives ongoing, research-based interventions to access printed text or learn braille, as deemed appropriate by the Individualized Education Program (IEP) team and indicated as a specific instructional goal in the student’s IEP. There is a similar criterion for the calculator accommodation. The principles of UDL certainly support rigor in instruction and assessment. However, we are deeply concerned that these criteria potentially penalize students for the actions or decisions of the teachers or administrators. The appropriate use of accommodation policies and accessibility features for assessments is to remove barriers to the accurate measurement of a student’s skills and knowledge. The failure to provide research-based interventions must be addressed, but not in accommodations policies.

The same concern applies to the criteria which deny accommodations to students unless their disability “severely limits” their reading or calculation skills. “Severely limits” is a difficult to define term. In addition, students who have a lesser level of challenge may still be unable to demonstrate their reading comprehension or higher order math skills if they are struggling with the decoding or simple calculation components of the items. If the barrier is construct irrelevant it should be removed.

While the assessment consortia are charged with developing a common set of policies and procedures for providing assessment accommodations for students with disabilities, part of which is now available for comment, the rights of students with disabilities found to need special education services and supports under the Individuals with Disabilities Education Act (IDEA) must not be compromised. Additionally, current law requires that decisions regarding assessments and accommodations must be made by the IEP team, or the team under Section 504 of the Rehabilitation Act of 1973, and must be based on individual student need-- as long as the accommodations do not invalidate test score interpretations.

PARCC must exercise restraint in the development of accommodation policies and procedures in order to support and align with the statutory responsibility of the IEP and Section 504 teams with regard to accommodation determination. **We have made specific recommendations below, some of which suggest edits to the PARCC accommodations policies. However, the best course of action would be for PARCC to strike the entire Proposed Eligibility Requirements for both ELA and Math and revise to adhere to Section 504 and IDEA.**

**Recommendations:**

- PARCC’s overarching responsibility—as test developer—is to determine the specific accommodation that cannot be used for certain test items because the accommodation would invalidate the construct being measured. This information will be used by IEP teams to determine use of reading access or calculator accommodations based on individual need.
- To ensure transparency, PARCC should make public its approach to analyzing test item construct in relationship to developing its accommodation policy on reading access and calculator accommodation.
- To ensure transparency, PARCC should make public its definition of “universal design” so stakeholders can determine whether they are following the principles of UDL mentioned in the Race to The Top Assessment application template.
- Pursuant to the principles of UDL, any accommodation or built-in accessibility feature that does not affect the construct being measured should be available to any student who would benefit from it—not just the limited group of students described in PARCC’s policy. Likewise, if the construct is affected by an accommodation or built-in accessibility feature, then no student should be allowed to use it.
- PARCC should eliminate terms like “eligibility,” “small number,” “severely limits,” “students who have a disability,” “student with a specific disability,” “student with visual impairments.” These terms attempt to limit which students are “eligible” for a particular accommodation, which interferes with the right of students with disabilities to participate in the same assessment provided to students without disabilities and would likely be considered a violation of IDEA and of the Section 504 of the Rehabilitation Act of 1973.
- Language that conditions provision of accommodations on the student having received ongoing, research-based interventions should be eliminated. A student with a disability who is eligible under IDEA/Section 504 cannot have his/her right to participate meaningfully in an assessment provided to all other students conditioned upon actions of the student’s IEP team /Section 504 team.
- The PARCC Accommodations Manual should be developed so as to have applicability for both through-course and summative assessments. Students must be assured of the consistent availability and application of accommodations on all aspects of assessments designed to measure College and Career Readiness.