

PARCC Draft Reading Access Accommodations & Calculator Accommodations for Students with Disabilities Public Comment Survey

READING ACCESS ACCOMMODATION POLICY

I support the draft reading access accommodation policy for students who are blind or visually impaired and have not yet learned braille *

- Yes
 Yes, with edits
 No

ANSWER "NO" TO THIS QUESTION.

Explain why you do not support the policy. You may reference such topics as construct validity, impact on instruction, impact on reporting of test results, grade span for which the accommodation is allowed, etc.

USE SUGGESTED RESPONSE BELOW

SUGGESTED RESPONSE:

Terms such as "student with a specific disability" or "student with visual impairments" should not be used. The IEP team is charged with making accommodations decisions for all IDEA-eligible students every year, as part of the annual IEP process. Therefore, to attempt to limit "a priori" which students are "eligible" for a particular accommodation impedes the IEP team's responsibility and would likely be considered a violation of IDEA for this reason.

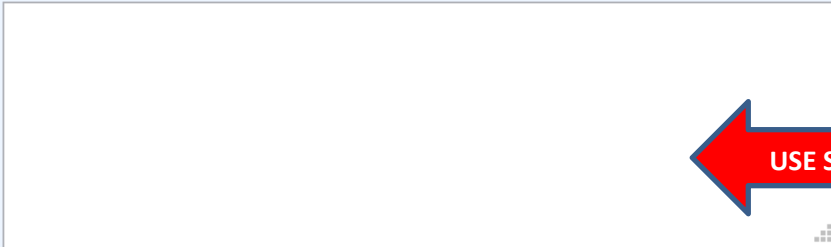
Additionally, students who are blind or visually impaired, IDEA makes it clear that the IEP Team must "provide for instruction in Braille and the use of Braille unless the IEP Team determines, after an evaluation of the child's reading and writing skills, needs, and appropriate reading and writing media (including an evaluation of the child's future needs for instruction in Braille or the use of Braille), that instruction in Braille or the use of Braille is not appropriate for the child." 20 U.S.C. § 1414(d)(3)(B)(iii). Therefore, the PARCC policy cannot impose a requirement that all children will have received Braille instruction prior to becoming eligible for testing accommodations.

I support the draft reading access accommodation policy for students who have a disability that inhibits them from accessing printed text

- Yes
 Yes, with edits
 No

ANSWER "NO" TO THIS QUESTION.

Explain why you do not support the policy. You may reference such topics as construct validity, impact on instruction, impact on reporting of test results, grade span for which the accommodation is allowed, etc.



USE SUGGESTED RESPONSE BELOW

SUGGESTED RESPONSE:

The draft policy applies only to those students who are found eligible under the Individuals with Disabilities Education Act (IDEA). However, under the ESEA students covered by both IDEA and Section 504 of the Rehab Act must be provided with appropriate accommodations.

Terms such as "student with a specific disability" should not be used as doing so risks making determination of need for accommodations contingent upon the disability categories used to determine eligibility for IDEA.

The IEP team is charged with making accommodations decisions for all IDEA-eligible students every year, as part of the annual IEP process. Therefore, to attempt to limit "a priori" which students are "eligible" for a particular accommodation impedes the IEP team's responsibility and would likely be considered a violation of IDEA for this reason.

The IEP team could be provided, by way of the Accommodations Manual, with certain student characteristics that generally would be present for students needing a reading access accommodation. However, such a list should not be framed as an "eligibility" requirement.

Providing specific "conditions" that students must meet in order to be provided the needed accommodation would violate the student's rights under Section 504 of the Rehabilitation Act of 1973. A student with a disability who is eligible under IDEA and/or 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 Teams and/or Section 504 Team. Failure to ensure that such a student has an opportunity to demonstrate his/her knowledge and skills of the Common Core Standards as all other students would deprive the student of comparable benefits and services under 34 C.F.R. §104.4. While the particular items addressed in these conditions are certainly desirable, a student's rights cannot be limited by their existence, particularly when the student has no control of these items.

The proposed reading access accommodation policy is consistent with the policy my state currently offers.

- Yes
- No
- Unsure
- Other:

If you answered "No" to the question above, please note how the students identified in the draft policy for reading access accommodations participate in your state assessment.

E.g. Student takes the assessment without an accommodation; student takes the assessment with other accommodations (please identify); student is eligible for and participates in the alternate assessment.

CALCULATOR ACCOMMODATION POLICY

Calculator Accommodation Policy

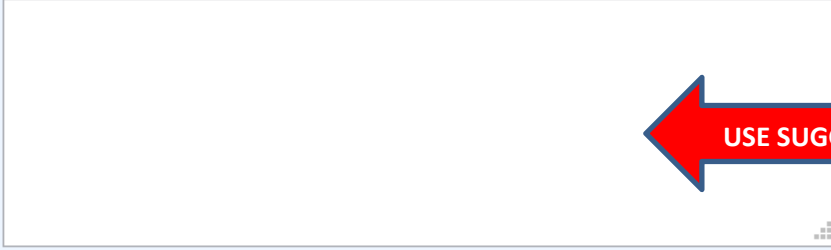
PARCC recommends that the PARCC Accommodations Manual include a restricted calculator accommodation on summative mathematics test sessions in all grades where calculators are not allowed. This applies to the small number of students with specific disabilities that severely limit or prevent them from performing basic calculations. For students whose disability (or disabilities) significantly impacts their ability to perform basic calculations, this accommodation is designed to allow them access to a calculator in order to respond to mathematics assessment items intended to measure, in particular, higher order mathematics skills. The accommodation would apply to all items/tasks in sessions where calculators are not allowed, with the exception of fluency items/tasks in grades 3-6. This exception is required so as to not compromise the skill that is being measured, which is to calculate without the aid of a calculator.

I support the draft calculator accommodation policy for students with disabilities. *

- Yes
- Yes, with edits
- No



Explain why you do not support the policy. You may reference such topics as construct validity, impact on instruction, impact on reporting of test results, grade span for which the accommodation is allowed, etc.



SUGGESTED RESPONSE:

The draft policy is overly restrictive. Accommodations must be made available to both IDEA and Section 504 eligible students.

Terms such as “student with a specific disability” should not be used. The IEP team is charged with making accommodations decisions for all IDEA-eligible students every year, as part of the annual IEP process. Therefore, to attempt to limit “a priori” which students are “eligible” for a particular accommodation impedes the IEP team’s responsibility and would likely be considered a violation of IDEA for this reason.

Providing specific “conditions” that students must meet in order to be provided the needed accommodation would violate the student’s rights under Section 504 of the Rehabilitation Act of 1973. A student with a disability who is eligible under IDEA and/or 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 Teams and/or Section 504 Team. Failure to ensure that such a student has an opportunity to demonstrate his/her knowledge and skills of the Common Core Standards as all other students would deprive the student of comparable benefits and services under 34 C.F.R. §104.4. While the particular items addressed in these conditions are certainly desirable, a student’s rights cannot be limited by their existence, particularly when the student has no control of these items.

Calculator Accommodation Policy

The proposed calculator accommodation policy is consistent with the policy my state currently offers.

Yes

No

Unsure

Other:

If you answered "No" to the question above, please note how the students identified in the draft policy for reading access accommodations participate in your state assessment.

E.g. Student takes the assessment without an accommodation; student takes the assessment with other accommodations (please identify); student is eligible for and participates in the alternate assessment.

Comments

Please use this space to provide any other comments not addressed in previous questions.

(Applicable for both the draft reading access and calculator accommodations policies)



SUGGESTED RESPONSE:

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.

PARCC's overarching responsibility—as test developer—is to determine the specific accommodation that could not be used for certain test items, e.g., the accommodation would invalidate the construct being measured by the test item. This information will be used by IEP teams to determine use of a calculator based on individual need.

PARCC has used an inappropriate theoretical approach to the development of this accommodations policy. Specifically, PARCC appears to base the accommodation policy on a psychometric approach to “validity” which considers individual student characteristics as the core of the determination of “invalidating” the test construct. The development of this accommodations policy should be based solely on the test item with an analysis of whether or not use of the accommodation “fundamentally alters” what is intended to be assessed. Thus the eligibility criteria for using a particular accommodation should NOT be conditioned on student eligibility criteria and whether the student is ‘disabled enough,’ but instead should be based on the content of each test item. All accommodations should be available to all students deemed to need it by the IEP team unless and until PARCC can provide evidence that use of that feature as an accommodation fundamentally alters what is intended to be assessed by the test item.