

Eligibility Assessment Requirements at the Postsecondary Level for Students With Learning Disabilities: A Disconnect With Secondary Schools?

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Abstract

In order to gain access to services at universities and colleges, students with learning disabilities must provide documentation of their disability. However, secondary schools are not required by law to provide the documentation often requisite at the postsecondary level. Also, it appears that secondary schools may collect even less psychometric data if proposed changes to the Individuals With Disabilities Education Act 1997 are adopted during the current reauthorization process. This disconnect between what is provided and what is needed in terms of eligibility requirements has become a hot topic in the field. Recently, the National Joint Committee on Learning Disabilities held a discussion on this issue, and it was decided that an initial piece of information needed for examining this issue was data about postsecondary institutions' of higher education eligibility requirements. This study presents findings about the eligibility requirements of 104 colleges and universities in 36 states. Results show several variables highlighting the discontinuity between evaluation data collected in high school and what is required at the university level, which include evaluation currency, examiner qualifications, areas of diagnosis, use of adult-normed tests, use of discrepancy, and establishment of functional impact.

In recent years, assessment practices for students with learning disabilities (LDs) in American schools have evolved due to legislative reauthorizations. Beginning with the Individuals With Disabilities Education Act 1997 (IDEA, 1997) and its newest proposed reauthorizations (2004), psychoeducational assessment requirements have been minimized for a variety of reasons (e.g., paper reduction act, response to treatment models). For many students with LD, these changes do not impinge on transition from high school; however, for a group of college-bound students with learning disabilities, these changes appear to have created a mismatch between *available* assessment data and *required* assessment data used in making eligibility and accommodation decisions at postsecondary institutions.

The mismatch between documentation availability and documentation requirements stems from differences in the laws that drive policy and practice for the two educational settings (i.e., public schools vs. postsecondary schools). Based on comparisons of IDEA, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA), many differences are discernable ranging from mission, scope, definition, identification procedures, to service delivery (Rothstein, 2002). While IDEA focuses its mission and scope to provide a Free Appropriate Public Education (FAPE) to individuals in elementary or secondary public school settings, Section 504 and ADA are more focused on opportunity, equal access, integration, and antidiscrimination.

The ADA and Section 504 protect the civil rights of individuals with disabilities and ensure equal access through the use of appropriate accommodations. In contrast, IDEA promotes success for students with disabilities by providing educational assistance. Therefore, the intent of the law (i.e., success vs. access), influences assessment practices and requirements occurring in secondary and postsecondary institutions. Shaw (2004) outlines the most recently proposed reauthorization documentation requirements, which show secondary schools drifting away from psychoeducational assessment batteries and formal testing for transition purposes. In many instances, high school IEP Teams will only need to provide a “summary of performance” regarding a student’s academic achievement, functional performance, and accommodation needs as they enter postsecondary education (Shaw, 2004). This is of concern because postsecondary institutions make eligibility and accommodation determinations based primarily on information gleaned from formal psychoeducational evaluations (Ofiesh & McAfee, 2000).

A disconnect appears to exist between the assessment information that high schools provide and what colleges and universities need. As Shaw (2004) points out, students with LD are the ones left to figure out how to provide (and pay for) the documentation needed to justify and support their disability and subsequent accommodations in postsecondary education settings.

In 2003, the National Joint Council for Learning Disabilities (NJCLD) convened a summit of postsecondary disability service providers to identify and discuss issues related to students with LD and postsecondary education. One major issue identified by this group was the documentation disconnect outlined above. It was also decided that an initial step in exploring this issue should be to identify what colleges and universities currently require in the way of eligibility documentation. Hopefully, this information could be used as a starting point for a dialogue about how to deal with this issue. Thus, the purpose of this study was to survey colleges’ and universities’ eligibility requirements needed for students with LD to obtain services and academic accommodations in order to begin to identify the areas of disconnection.

Method

Two members of the NJCLD who participated in the summit agreed to help with this survey. The Association on Higher Education And Disability (AHEAD) contacted their membership (via letter and through an

electronic listserv) and asked them to send their written documentation criteria for analysis. Additionally, the Learning Disabilities Association (LDA) included the request for this information via their newsletter. The present study employed an open-ended evaluation of current policies and practices to alleviate the reliance on self-reporting. The primary investigators determined that a direct investigation of original documentation facilitates a truer picture of existing policies and criteria utilized by offices of disability services across the United States: perhaps more so than individual survey questions.

Before analyzing these provided documents, a panel of experts in the area of postsecondary disability services developed a checklist targeting topics related to eligibility determination, diagnostic information, and accommodation provision. These topics are reflected as items in Tables 1–3. The checklist acted as a guide for extracting target information from participant responses. Responses were collated, coded, tallied, and frequencies and percentages were computed using SPSS statistical software package.

Results

A total of 110 professionals from offices for students with disabilities at postsecondary institutions (2-year schools: $n = 17$; 4-year schools: $n = 93$) responded to calls requesting documentation. Professional schools (e.g., medical, law) and schools outside the United States were not included for review, lowering the number of 4-year-school participants to 87. Institutions from 36 states including the District of Columbia responded to requests. Participants responded by letter, e-mail, and by deferring [questioners? interviewers? to their institutions’ Web sites. Additional information was obtained by perusing office of disability services Web sites when letter and e-mail responses provided limited details. Based on information provided by participants, at least four states (California, Colorado, New Jersey, and Wyoming) offer statewide guidelines for all colleges and universities to follow, thereby increasing the generality of the data collected. Results for 2- and 4-year schools were combined for analysis after it was found there was only one statistical difference between responses to items (see discussion section).

Table 1

Diagnostic Information Required by Postsecondary Institutions

Diagnostic information	Valid percentage
Currency:	
3 years	45
5 years	3
Recent	17
Adult exceptions	1
Examiner Qualifications:	
Qualified	68
Adult experience	39
License/certification	48
other	12
Required Diagnostic Areas:	
Aptitude, achievement, processing	62
Aptitude, achievement	22
Required/Suggested Tests:	
<u>Aptitude</u>	
WAIS-R;WAIS-III	67
WJ-R Cognitive	56
Stanford-Binet-4	43
Kaufman	25
Slosson-R	2
<u>Achievement</u>	
WJ-R-Achievement	62
WIAT	42
WRMT	28
Nelson-Denny Reading	25
TOWL-3	24
SATA	34
SDMT	20
TASK	27
Other	5
<u>Information Processing</u>	
WAIS-III	34
DTLA	26
WJ-R Cognitive	40
Bender	1
Unaccepted Tests:	
Slosson	20
KBIT	22
Nelson Denny	5
WRAT	40

Table 1 continues

Table 1 (continued)

Diagnostic Information Required by Postsecondary Institutions

Diagnostic Information	Valid percentage
Required Scores:	
“Scores” not specified	29
Standard Score	11
Standard score, percentile	21
Standard score, percentile, grade equivalent	11
Adult Normed Assessments Required	42

Table 2

Eligibility Determination Guidelines Used by Postsecondary Institutions

Eligibility determination	Valid percentage
LD Eligibility:	
Discrepancy Model	25
Processing Deficit	14
DSM-IV Code	20
NJCLD Definition	8
Other	3
Guidelines Used:	
ADA/504	70
AHEAD	30
ETS	6
State	14
Other	12
Functional Impact:	
Major life activity only	26
Accommodation linked to disability only	0
Major life activity & linked to disability	52

Table 3

Accommodation Provision Guidelines Used by Two and Four-Year Institutions

Accommodation provision	Valid percentage
Influencing Factors:	
Professional judgment disability services office	53
Report writer recommendations	75
Reasonableness of accommodation	67
History of use/success	36
Test scores	24
Rationale	38
Considers program/course studied	19
Faculty input	3
Student input	19
Not for remedial purposes	8
IEP considered, not sufficient	39
Accommodation grace period	8

Diagnostic information

The checklist targeted five areas related to diagnostic information: assessment currency, examiner qualifications, required diagnostic areas, recommended or accepted tests, and score reporting. A majority of respondents have currency requirements for assessment data. Many require assessments to be conducted within the past 3- (47%) to 5-years (3%) or “recently” (18%).

Many colleges and universities specified examiner qualifications. A majority of institutions (68%) expressed the need for testing to be conducted by a “qualified” individual. Some institutions specified that “qualified” meant the examiner must be a licensed or certified professional (48%) with adult experience (39%). (See Table 1 for complete diagnostic and test requirement details.)

Tests of aptitude, achievement, and information processing are required by 61% of schools. Fewer schools require *only* aptitude and achievement tests (22%). Most colleges and universities (67%) listed specific cognitive and achievement tests accepted (or suggested) as part of a complete psychoeducational battery. In some cases (41%), they also listed tests that are not accepted for LD documentation. Adult-normed tests are required by 42% of all schools.

A majority of the participating colleges and universities (72%) require students to furnish assessment scores when applying for disability-related services. Some require only standard scores (11%), while others

request standard scores along with percentiles (21%). Still others request 3 types of scores (11%): standard scores, percentiles, and grade equivalent scores. Some did not specify the type of scores required (29%). Table 1 summarizes diagnostic information required by postsecondary institutions.

Eligibility determination

Colleges and universities report a variety of methods for determining LD eligibility. Discrepancy models such as aptitude-achievement or intracognitive discrepancies are used by approximately 25% of schools for eligibility determination, and even fewer (14%) require that a processing deficit exist. A DSM-IV code is required by 20% of all institutions. A small number (8%) of schools defer to LD definitions for decision-making (i.e., NJCLD definition).

Many schools report that they rely on federal definitions of LD or other professional standards when making eligibility decisions. Organizational or governmental guidelines are used in decision-making such as ADA and Section 504 (70%), AHEAD (30%), ETS (6%), state guidelines (14%). Less than 1% of schools report relying on other organizational guidelines such as ACT, Board of Regents, and university standards. Approximately half of the institutions surveyed require evidence of a functional impact of the disability on a major life activity as well as evidence to link disability to the

need for specific accommodations. Table 2 summarizes eligibility determination guidelines data.

Accommodation provision

Most participating colleges and universities report using guidelines for granting accommodations to students with LD. For most respondents (96%), the office of disability services makes the final decision regarding eligibility. They also use their professional judgment (53%) combined with a variety of other information to make accommodation decisions. Accommodation decisions are based on information provided by students including report writers' recommendations (75%) and reasonableness of the accommodation request (67%). To a lesser degree, colleges and universities use additional information such as history of use or success with accommodation (36%), test scores (24%), rationale for request (38%), and program or construct consideration (19%). In some cases, faculty (3%) or students (19%) are involved in the accommodation-determination process.

Individualized Education Plans (IEPs) or 504 Plans are considered by some colleges and universities (39%) but are not deemed sufficient in making eligibility and accommodation decisions. A larger number of 2-year (24%) versus 4-year (3%) institutions accept IEPs and 504 Plans. This was the only statistically significant difference between 2- and 4-year schools in all areas analyzed. Finally, grace periods are rarely offered to students applying for accommodations. Only 8% of schools report granting accommodations during a grace period. Table 3 summarizes accommodation provision guideline data.

Discussion

The survey results reveal several relative consistencies among postsecondary institutions' policies and practices for determining LD eligibility and accommodation provision. In most cases, evaluation data must be recent (e.g., 3–5 years), administered by a qualified examiner often with adult experience and typically must include standardized, norm-referenced (with adults) measures of aptitude, achievement, and information processing. These scores must be reported as standard scores or percentiles. Additionally, eligibility decisions are based on ADA, Section 504 guidelines with an emphasis on establishing functional limitations in a major life activity. In terms of providing accommodations, postsecondary service providers are requiring a clear rationale and history of use along with data from psychoeducational evaluations (Ofiesh & McAfee,

2000) to make their decisions. And finally, there appears to be little use of a grace period that would allow access to accommodations while the student attempts to obtain the needed evaluation data and documentation.

When the above generalities about evaluation criteria required at the postsecondary level are contrasted with legal mandates within IDEA and recommended revisions to this law, the discontinuities between secondary and postsecondary are apparent and several. The lack of a legal mandate to reevaluate in high school is in contrast to the need for a recent evaluation at the college level. For example, students' whose last evaluation occurred during their 8th grade would likely have needed to update their documentation when they went to university. The requirement for assessing aptitude and for processing and using some form of discrepancy between ability and achievement conflicts with a trend in public schools of not requiring IQ tests and downplaying discrepancy. In addition, requiring adult-norm-referenced tests starkly contrasts with the proposed use of curriculum-based measures and the use of a response-to-intervention model for determining eligibility in public schools (Office of Special Education Programs, 2002). Other areas of disconnect that may come into play are providing evidence of functional limitations/life impact as well as the lack of obtained data on the effectiveness of provided accommodations.

Due to inconsistencies between the requirements of postsecondary institutions and information provided by high schools, students with LD may become trapped between regulations of one agency versus the requirements of another. These students and their families are forced to find alternative methods of assessment such as private psychoeducational evaluations, which are often expensive and, for some, an unreasonable alternative. This can lead to inequity in accessing postsecondary educational opportunities for students who may not be able to pay for expensive evaluations.

Professionals at the secondary and postsecondary levels need to find ways to deal with this issue. It is beyond the scope of this study to specify the types of action that need to take place, but it seems crucial that some action must be taken. Postsecondary providers need appropriate information that will allow them to make defensible, legal decisions about the presence of a disability, the impact of the disability, and the need for specific accommodations. At the same time, secondary personnel are not likely to provide this information in the manner currently required at many colleges and universities.

A starting point might be to look at the opportunities for gathering data at the secondary level (e.g., 504 plans, IEPs, performance state assessment tests using specific accommodations etc.) and framing them in ways that will be acceptable and useful to postsecondary service providers. To meet this goal, continued collaboration between secondary and postsecondary institutions is key. Schools, as well as students and their families, should be educated about the differences between accommodations and eligibility criteria in K–12th grades versus higher education settings. To help alleviate divisions among both groups, professional organizations should continue to problem solve on ways to ease the transition and decision-making process between high school and college. Currently, stakeholders at the secondary and postsecondary levels (e.g., NJCLD; Transition Documentation Task Force) are working together to provide recommendations for more consistent policies and practices among agencies.

Based on the results of the survey, postsecondary personnel will need to examine how they can adjust current practices in ways that still adhere to the law and are defensible to professors and administrators at their institutions. Basically, both sets of stakeholders need to explore what is possible and acceptable and to negotiate a middle ground. Otherwise, the problem will remain, and the student will be caught in the middle.

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