TIPS FOR DISABILITY SERVICE PROVIDERS for Students with Disabilities

ETS receives more than 13,000 requests for accommodations from individuals with disabilities each year for our graduate and professional tests. Testing agencies such as ETS are responsible for providing access to these tests for candidates with disabilities, along with reasonable accommodations to ensure fairness for all test takers.

The ETS Office of Disability Policy (ODP) offers the following guidelines to help disability service providers as they assist individuals with disabilities in submitting their requests for testing accommodations. Familiarity with our accommodations request guidelines and procedures is the best way for service providers to prevent unnecessary delays in the process.

For the ETS Documentation Guidelines for specific disabilities, such as learning disabilities (LD), ADHD, traumatic brain injuries, intellectual disabilities, autism spectrum disorder, psychiatric disabilities and physical disabilities, consult the ETS website at www.ets.org/disabilities.

HOW YOU CAN HELP YOUR STUDENTS

- Advise students to plan in advance and be aware that the application review process can take approximately six weeks. Students should register for accommodations well in advance of needing test scores.
- Review ETS documentation criteria and procedures at www.ets.org/disabilities.
- Help students gain a better understanding of what additional materials ETS Disability Services is requesting if you receive a letter seeking additional information.
- Assist students in identifying and selecting a qualified professional to provide an updated evaluation, or documentation that substantiates the diagnosis, when the documentation is outdated or incomplete.
- When appropriate, complete a Certification of Eligibility (COE): Accommodations History form based on ETS’s disability documentation criteria.
When Test Takers Can Use the Certification of Eligibility: Accommodations History Form

The COE provides verification of an individual’s history of accommodations use in college or the workplace. In some cases, the COE also serves as a shortcut for approval of specific accommodations. The COE may only be used as a shortcut if the documentation on file with the disability service provider meets ETS’s criteria. When the COE is used in this way, documentation of the disability should not be sent to ETS.

Here are some examples of scenarios where the COE can be submitted without documentation:

- Test takers with LD, ADHD, TBI, ASD, psychiatric disabilities, and/or physical disabilities requesting 50 percent extended time and/or extra break time can use the COE in this way
- Test takers who are deaf or hard of hearing and are requesting only 50 percent extended test time, breaks, and/or a sign language interpreter, or oral interpreter for spoken directions
- Test takers who are blind or legally blind or have low vision and are requesting only some subset of the following: screen magnification, selectable background and foreground colors, braille, braille slate and stylus, Perkins brailler, large print (test book and/or answer sheet), computer voicing (GRE® revised General Test only), audiocassette or CD recording, reader, scribe, or 50 percent extended test time and/or extra breaks

If the COE is used appropriately and according to ETS’s instructions, a test taker can expect a response from ETS in approximately 2–3 weeks rather than the 4–6 weeks that’s typically required for a full review of documentation. If students are eligible for the shortcut and submit documentation in addition to the signed COE, the process will be delayed because all decisions will be based on the documentation submitted.

The COE may be signed by an authorized person in the Office of Disability Services at an institution of higher education, a human resources representative at a place of employment or a vocational rehabilitation counselor. Forms completed and signed by a member of the applicant’s family, or by the licensed and/or certified professional who diagnosed the disability, will not be considered.

When you sign the COE, you are verifying that the documentation on file in your office meets all of our criteria. These criteria are summarized briefly in section B on the following page and on the COE. Refer to our policy statements at www.ets.org/disabilities for further details.

When Is Documentation Required?

When criteria for using the COE are not met, documentation will be required.

A. Documentation must be submitted if the test taker:

- is requesting accommodations other than 50 percent (time and a half) and/or extra breaks, or
- has a disability diagnosis that was first made within the past 12 months, or
- indicates on Part I of the Testing Accommodations Request Form that he/she has a medical condition, or checks “Other” under “Nature of your disability,” or
- has a sensory disability and the accommodations request does NOT match the specifications listed on the COE (see page 10 of the Bulletin Supplement at www.ets.org/s/disabilities/pdf/bulletin_supplement_test_takers_with_disabilities_health_needs.pdf), or
- has requested accommodations that are different from those that ETS has approved for this test taker within the past two years, or
- has not previously used the accommodations that are now being requested for at least one semester or four months, or
- is unable to submit a COE.
B. ETS documentation criteria

If documentation is required, it must meet the following criteria:

• **Be typed or printed on official letterhead** and **signed** by an evaluator qualified to make the diagnosis (include information about license or certification and area of specialization)

• **Clearly state the diagnosed disability or disabilities in accordance with the current DSM or ICD** (a diagnosis alone is not sufficient to support accommodations requests)

• **Describe the functional limitations** resulting from the disability or disabilities

• **Be current** (i.e., completed within the past year for psychiatric disabilities and physical disabilities or chronic health conditions; or within the past five years for LD, ADHD, autism spectrum disorder and intellectual disabilities)

Documentation for traumatic brain injury must have been completed within the past one to three years, depending on the date of the injury (see our Guidelines for Documenting Traumatic Brain Injury at www.ets.org/disabilities/documentation/documenting_traumatic_brain_injury for details)

Note that this recency requirement does not apply to physical or sensory disabilities of a permanent or unchanging nature.

• **Include complete educational, developmental and medical history** relevant to the disability for which testing accommodations are being requested

• **Include a list of all test instruments** used in the evaluation report and relevant subtest standard scores used to document the stated disability; all test instruments must have adult norms

This requirement does not apply to physical or sensory disabilities of a permanent or unchanging nature.

• **Describe the specific accommodations requested**

• **Support each of the requested testing accommodations by providing a clear rationale**

C. Documentation update for LD, LD/ADHD or ADHD

If the documentation provided by the candidate does not meet ETS’s documentation requirements for LD, LD/ADHD or ADHD, candidates have the option of submitting new documentation or a documentation update. A documentation update is a report by a qualified professional that includes a summary of the original disability documentation findings, as well as additional clinical data that’s necessary to establish the candidate’s current eligibility and the appropriateness of the requested testing accommodations.

It is recommended that a documentation update include:

• A restatement of the diagnosis, if it still applies, including date(s) for all prior diagnoses and data used to establish the diagnosis (evidence regarding the diagnosis should be more than a self-report by the test taker)

• An update that verifies the continuing weakness in those areas identified as weak in prior evaluation(s)

• Current functional limitations due to the disability, including information regarding its duration, severity and impact on academic performance in general and on test taking in particular

• Observational data gathered during the evaluation of behavior, such as affect, concentration, attentional fatigue, executive functioning and fluency

• History and types of accommodations received and used, consistency and circumstances of use (e.g., the type of test in which accommodations were most helpful), or an explanation of why no accommodations have been used prior to the current request

• Discussion of the appropriateness of the requested accommodations for ETS tests, including objective evidence confirming that performance would be negatively affected without the requested accommodations

Additional evaluation data for LD or LD/ADHD should include:

• Achievement measures that substantiate the ongoing impact of the disability on academic performance. A full battery of tests is not necessary, but the update may include selected academic achievement tests and subtests deemed appropriate to support current eligibility. There should be an explanation of why certain subtests were selected for the update, an interpretation of the scores received and a discussion of relevant error patterns based on the candidate’s scores.

• An assessment of cognitive functioning, only if the existing documentation does not contain adequate and age-appropriate information to establish the disability status. An update of intellectual functioning is generally not necessary if a measure with adult norms is used, such as the Wechsler Adult Intelligence Scale, since intellectual functioning is typically stable in adulthood.
Writing Letters of Support

Disability service professionals on college and university campuses have the opportunity to engage with students and learn about them and their need for accommodations. ETS, however, engages in the interactive process with its thousands of test candidates with disabilities worldwide only through their documentation. ETS, therefore, depends on documentation to make decisions about appropriate testing accommodations. You may further assist your students in obtaining accommodations for ETS tests by writing a letter of support that goes above and beyond the information provided on the COE.

The following includes some questions you may address in your letter of support:

- What was the basis for your decision to provide this candidate with accommodations at your institution?
- What did you observe about this candidate during your intake interview that might support the need for testing accommodations?
- Has the candidate used testing accommodations consistently or are the accommodations used only for a specific type of test (e.g., essay tests)?
- If the candidate was granted extended test time, did he/she use all of the allotted extended time or only a portion of the extended time?
- Has the candidate shown improvement in test scores or course grades since receiving accommodations?

Personal Statement from Students

Test takers may wish to write personal statements to support their requests for accommodations. A personal statement may include the following information:

- A description of the nature of the disability and how it may impact them during a high-stakes test and/or in an academic setting
- A rationale for why they believe they need each of the requested accommodations
- A discussion of how the accommodations have helped in the past (if previously used in college or the workplace)
- Reasons why the requested accommodations were not previously used in college or the workplace but are currently being requested

For questions, contact ETS Disability Services by email at stassd@ets.org or call 1-609-771-7780. For tips, visit www.ets.org/disabilities/test_takers/tips.