

New State-Wide Testing: Partnership for Assessment of Readiness for College and Careers (“PARCC”)

Beginning with this school year, Ohio school districts will replace previous state-wide testing with the Partnership for Assessment of Readiness for College and Careers (“PARCC”) exams. These assessments, designed to measure students’ mastery of the Common Core standards, are expected to be lengthier and more comprehensive than the OGTs and OAAs. In implementing these new measures, school districts may face various challenges, including providing accommodations for special education students and those with Section 504 plans. Recognizing that students have different testing needs, the PARCC assessment offers both accessibility features and accommodation options. This article addresses both, highlights key features of each, and suggests ways teachers and students can prepare for the assessment.

Accessibility Features

Accessibility features – embedded into the computer program – are available to all children, and include both standard accessibility features and those that must be identified in advance. Standard features are available to any student at his or her discretion during the test. Examples include highlighting and line reading tools, spell checker, and blank paper. Some accessibility features, however, must be identified in advance. These include features that may be distracting to others, such as text-to-speech read aloud for math assessments, background color contrast, and answer masking. To prepare for the test, teachers, parents, and students should practice the available options and create a Personal Needs Profile (“PNP”).

Accommodations

Unlike accessibility features, accommodations are available only to students with disabilities. The PARCC tests allow four types of accommodations: Presentation; Response; Timing and Scheduling; and Setting. The IEP or Section 504 team members are responsible for documenting each child’s accommodations on their IEP or Plan and including them in the student’s PNP. Importantly, the PARCC organization imposes stricter standards for several accommodations, and teams may need to change the way they document students’ needs in these areas.

This newsletter is intended as general information and not legal advice. No attorney-client relationship exists. If legal advice is required, obtain the services of an attorney. © Copyright 2014 Britton Smith Peters & Kalail

Upcoming Events

BSPK's Legal Hotline Seminars:

- **Cleveland:** October 16, 2014, from 8:30 a.m. to 12:30 p.m. at the Cuyahoga County Educational Service Center
- **Youngstown:** October 24, 2014, from 8:30 a.m. to 12:30 p.m. at the Mahoning County Career and Technical Center

Please visit our website for more information and registration details.

3 Summit Park Drive
Suite 400
Cleveland, OH 44131
T: 216.503.5055
F: 216.503.5065

www.ohioedlaw.com

Please visit our blog



@ohioedlaw

PARCC *continued*

Presentation Accommodations:

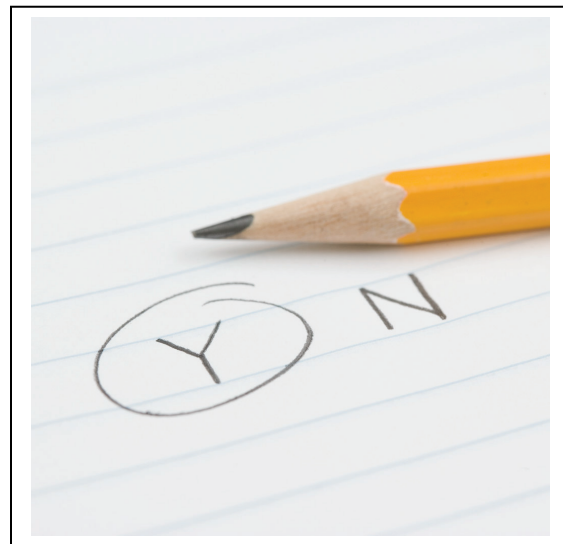
These accommodations alter the test administration format or method, and are intended for children who cannot read standard print. Most presentation accommodations address deafness and blindness, but one specifically applies to children with decoding deficits: Text-to-Speech for Literacy Assessments. Because this accommodation actually reads the reading and writing subtests aloud, the PARCC administrative body allows it only for children with: (1) a visual impairment and without Braille reading skills; (2) a hearing impairment preventing decoding due to a documented history of early and prolonged deprivation; or (3) a severe reading disability that prevents the student from decoding or reading fluently. Further, PARCC asks IEP or Section 504 team members to consider whether:

- the child uses text-to-audio during routine instruction;
- previous evaluations document the severity of the disability; and
- the student receives ongoing, intensive reading instruction and interventions.

PARCC guidance emphasizes that Text-to-Speech for the Literacy Assessments is not intended for students reading moderately below grade level; this is only for severely disabled students. Moreover, although the child's team decides which accommodations to include, PARCC plans to collect data and carefully monitor how often students receive Text-to-Speech for Literacy Assessments to "determine appropriate decision making." In short, if a student's team suspects he or she will need text-to-speech on the reading assessments, it should document that the child receives intensive reading interventions, and uses text-to-speech during routine instruction. Additionally, the team should ensure that this severe disability is well documented in previous evaluations. Finally, when a child received the above Text-to-Speech accommodation, the confidential parent and school report will note that a reading access accommodation was provided.

Timing and Scheduling Accommodations

Although frequent breaks and time-of-day considerations are available for all children, students with disabilities who need extra time are allowed up to one additional school day to complete one test session during the prescribed testing window (on September 25, 2014, PARCC announced the regular testing timelines – the update can be found [here](#)).



Feds: Medicaid Coverage Applies to Autism Services

This summer the federal Department of Health and Human Services issued a [bulletin](#) clarifying that certain comprehensive autism services must be covered by Medicaid. That includes services for children under age 21 that are deemed medically necessary to correct or ameliorate any physical or behavioral condition. Although the bulletin does not explicitly require Medicaid coverage for applied behavioral analysis (ABA), advocates expect it will be covered. This is particularly true in Ohio, where both a state and federal appeals court have found ABA to be a covered service under certain circumstances. *Hummel v. ODJFS*, 164 Ohio App. 3d 776 (Lucas App. 2005); *PLEAS v. Jones-Kelley*, 339 Fed. Appx. 542; 2009 U.S. App. LEXIS 16637 (July 29, 2009). The bulletin should result in more states covering comprehensive autism services under their respective Medicaid programs.

www.ohioedlaw.com

PARCC *continued*

Response Accommodations

As opposed to changing the testing format, these accommodations allow students to respond to questions using atypical methods or devices. These are intended for children with physical, sensory, or learning disabilities, and include many familiar accommodations, such as calculators, scribing, and word prediction banks. As with the aforementioned Text-to-Speech presentation accommodation however, PARCC establishes strict guidelines when the accommodation assists the child with the very material the test assesses.

- **Scribing:** No special requirements apply when a student needs scribing for math subtests or multiple-choice questions on the reading assessments. In contrast, children who need scribing for the writing subtests must have either a (1) physical disability preventing writing or keyboarding; or (2) a documented disability that severely limits written expression, even after repeated and varied instructional attempts. IEP teams considering scribing for students in the second category must also consider whether the disability is fully documented in previous evaluations, and whether the child receives ongoing intensive interventions in writing. As with the Text-to-Speech accommodation described earlier, the confidential parent and school report will note that a scribe was provided on the writing subtest.
- **Calculators/Other Math Tool:** All students use calculators on those PARCC assessments requiring a calculator. No students, regardless of disability, may use a calculator on math fluency items. If the assessment does not generally allow for a calculator but does not test math fluency, children with a severe calculation disability may use calculators if the team first considers whether: (1) evaluations document this disability; and (2) the student receives ongoing intensive instruction in basic calculation and fluency. The above also applies to children who need arithmetic tables (i.e., multiplication charts) and manipulatives. Importantly, the IEP or Section 504 plan **must** specify the exact device the child needs.
- **Word Prediction/Word Bank:** When the child enters the first few letters of a word, the computer program offers several completion choices. This option, again, is available only for students with physical disabilities or those with a severe disability preventing them from recalling, processing, and expressing written language, even after varied and repeated instruction. As before, the team must consider whether the child's evaluations thoroughly document this disability, and whether the child receives ongoing, intensive interventions in language processing and writing.

Setting Accommodations

Small group testing, specific seating areas, or alternate locations will be available to all students, depending on their PNP. Some students with disabilities, however, will need small group or individual testing because of their particular accommodations (i.e., scribe or interpreter) or due to a physical disability.

Unique or Emergency Accommodations:

When an IEP or Section 504 student needs an accommodation not listed in the general PARCC guidance manual, the team should complete a Unique Accommodation Request Form and submit it for consideration to Ohio's PARCC office. This applies also to students without an IEP or Section 504 plan who may need an accommodation because of an accident or recent illness.

Emergency accommodations, in contrast, do not require prior pre-approval. These are available for children with a temporary disabling condition such as a fractured limb, broken eyeglasses, or a prolonged illness. When a student needs an emergency accommodation, the principal or designee completes the relevant form, keeps it on file, and notifies the parent that an emergency accommodation was provided. The district assessment coordinator should retain the form and also determine that the accommodation will not invalidate the child's score.

In sum, although many PARCC accommodations will be familiar to educators, student teams will need to review IEPs and Section 504 plans to ensure the requisite documentation supports the child's accommodation needs.

The most recent PARCC manual on accommodations is available here:

<http://education.ohio.gov/getattachment/Topics/Academic-Content-Standards/Mathematics/PARCC-Math/PARCC-Accessibility-Features-and-Accommodations-Manual-November-2013.pdf.aspx>