



TO: Members of the PARCC Governing Board

DATE: June 24, 2013

RE: Approving PARCC Accessibility Features and Accommodations Manual for Release

I. Purpose

This purpose of this memo is **to prepare the Governing Board to consider approval of the *PARCC Accessibility Features and Accommodations Manual* for the field test in 2013 – 2014**. This decision is scheduled for the June 26 Governing Board meeting.

Adoption of the manual in June 2013 and public release in July are critical to supporting states and districts by providing adequate time to implement these policies for field testing and the first operational year of assessment.

II. Contents of the *PARCC Accessibility Features and Accommodations Manual*

PARCC is committed to providing *all students* with access to high-quality assessments. For the assessment system as a whole, PARCC is committed to ensuring that *all participating students*, including English learners (ELs) and students with disabilities (SWD), are able to engage in a meaningful and appropriate manner so valid results can be obtained for all students. Through a combination of universal design principles¹ and computer-embedded features, PARCC intends to design an assessment system that is inclusive of all students from initial design through implementation.

The *PARCC Accessibility Features and Accommodations Manual* is a comprehensive policy document that describes the supports that will be available for all students and gives guidance in the selection, administration, and evaluation of accommodations for the assessment of SWD and ELs on the PARCC End-of-Year, Performance-Based, and Mid-Year assessment components.

The majority of the proposed accommodations policies are currently in use across PARCC states. In contrast to many current state accommodations manuals, the draft PARCC manual includes not only proposed participation and accommodations policies for SWD and ELs, but also information about accessibility features that will be provided through PARCC's computer-based assessment delivery system for *all students* to optimize their performance on the assessments. By assessing students on computers, PARCC states will now have the opportunity to provide *all students* with accessibility features they frequently use in the classroom and daily life that were once provided only as accommodations for SWD and ELs (e.g. highlighters and enlarged font).

The draft manual details three ways in which PARCC's computer-delivered assessments are designed to provide students with increased access to the assessments:

¹ **Universal design** describes a framework for curriculum design, instructional processes, and assessments that provides all students with equal opportunities to learn and to demonstrate what they have learned. The purpose of universal design is to provide access to the greatest number of students during instruction and assessment, and to minimize the need for individualized design or accommodations. Universal design emphasizes that in order to increase access, assessment designers cannot use a "one size fits all" approach, but must make available opportunities for choice and create multiple alternatives and approaches for individuals to express their knowledge. Using these principles, item writers consider the full range of students in the assessment population, and develop items, tasks, and prompts that measure the desired construct for the greatest number of students without the need for accommodation or adaptation.

- Accessibility Features for All Students: Features for all students that are made available on the PARCC assessments that are called for by the universal design principles and will be embedded through the online delivery platform or the assessment administration.
- Accessibility Features for All Students (identified in advance): Features available to all students but only provided to students who are identified ahead of the assessment by a school-based educator or team of educators
- Accommodations: Supports for students with disabilities and English learners that increase access while maintaining a valid and reliable score

III. **Key Factors for Governing Board Consideration**

Through the PARCC Memorandum of Understanding, PARCC states agreed to develop and implement common policies and procedures, including common participation policies and accommodations policies for students with disabilities and English learners, with the purpose of establishing equitable access and comparability of results across students/districts/states. PARCC’s Accessibility, Accommodation and Fairness (AAF) Operational Working Group has led the development of this document with the support and technical assistance of the AAF Technical Working Group (nationally recognized experts). After several months of review and discussion, an early public comment period on several of the most controversial policies, and a full public comment period on the entire draft manual, the policies included in this manual have garnered the support of PARCC’s Mathematics, ELA/Literacy, Technology, and Test Administration Operational Working Groups, as well as the K-12 State Leads and national advocacy groups (see section IV).

While the public comment has indicated wide support for the proposed manual, some of the proposed policies for providing students with increased accessibility to the tests may be new to states, in particular, states new to computer-based assessments. Accordingly, we recommend the Governing Board to focus their attention on the following policies:

- **Accessibility Features for All Students**
 - These are features embedded in the online delivery platform or provided in the testing environment (e.g blank paper). Word processing tools (e.g. bold, underline, spell-checker), an online calculator, and the ability to increase font size of text are good examples of accessibility features that will be provided to all students.
 - Some accessibility features will require local educators to indicate the specific students who need them. Examples of such features include the ability to change the background color of the computer screen and a feature that will read-aloud mathematics questions and answer choices. Implementation of these types of features will require the development of Personal Needs Profiles (PNPs). PARCC will develop guidance and training to assist LEAs to implement PNPs. A full list of these features is provided in Section 2 of the manual.
- **Accommodations for Students with Disabilities**
 - These are accommodations for students with an IEP/504 plan that have traditionally been used on assessments. Examples of these accommodations are calculator use on non-calculator sessions except on fluency items, braille, closed captioning for video clips, and word prediction.
- **Accommodations with guidance to the IEP team and reporting notation on confidential score reports**
 - Reading access, either using text-to-speech, human reader, or embedded video of a human interpreter providing American Sign Language, is for a small number of students

with disabilities who would otherwise be unable to access printed or written texts and participate in the PARCC ELA/Literacy assessment. While there are still some concerns that this policy might interfere with the assessment of reading for some students, the advocacy community supports the proposed policy. Because the majority of the public commenters and state leads supported the inclusion of this policy, we recommend including it in the manual for field testing and conducting additional research to evaluate the efficacy of the policy.

- Scribing or speech-to-text is for students with writing disabilities on the writing section of the ELA/Literacy Assessment.
- **Accommodations for English Learners**
 - These accommodations will be selected based on the student’s needs to make the PARCC assessments more accessible. These include extended time, word to word dictionaries, and a scribe or speech-to-text for mathematics. While PARCC still needs to make a policy decision around translation of the assessment into languages other than English, a policy that allows directions to be translated to a student’s native language was included in this manual because test directions are construct irrelevant.

PARCC will collect and report data on the use of all accommodations at the state, local and school level for monitoring purposes. This will help states to monitor and evaluate the extent to which the accommodations are being used.

IV. Development & Review

The *PARCC Accessibility Features and Accommodations Manual* was developed and reviewed over several months through an iterative process involving the following groups of PARCC stakeholders:

- PARCC’s Accommodations, Accessibility and Fairness (AAF) Operational Working Group;
- PARCC’s AAF Technical Working Groups on Equity, English Learners and Students with Disabilities
- K-12 State Representatives who serve as the PARCC leads in their states;
- Additional state agency experts (including SEA special education and English learner experts);
- External experts, including English learner expert Lynn Shafer Willner, the National Center on Educational Outcomes (NCEO); and
- A host of national advocacy groups for SWD, ELs and equity and fairness.

V. Major Themes from the Public Comment Period

The full draft manual was released for public comment from April 18 to May 13, 2013. PARCC developed several tools to aid states in the gathering of key stakeholder input:

- Online survey to collect stakeholder feedback;
- Narrated PowerPoint presentations to orient stakeholders to the process used to develop the PARCC Accommodations Manual;
- List of frequently asked questions (FAQ) with answers; and
- Memo to State Leads with suggestions for effective strategies to engage and gather input from key stakeholders.

Thousands of individual comments were received as well as over 20 written responses from stakeholder groups. Major themes from the public comment period included recommendations to do the following:

- Reorganize manual and add audience and purpose;
- Allow more access to students by making accessibility features available to all students;

- Explain clearly what a personal needs profile is, which will code a student’s name, demographics, and any other accessibility features or accommodations a student should receive;
- Streamline the process for local IEP teams for selecting accommodations for students; and
- Public comment showed support of the lists of accessibility features and accommodations.

VI. Next Steps

Pending approval by the Governing Board, PARCC will release the first edition of the *PARCC Accessibility Features and Accommodations Manual* on July 25, 2013, and these policies will be implemented during the 2013 – 2014 field testing. Leading up to the release on July 25, PARCC will work with states and key national stakeholder groups to support the roll out of the manual, including with communications tools for parents, educators and other stakeholders.

In the fall of 2013, additional tools and supports will be released to the field to support the implementation of the manual.

As data on student performance is collected during PARCC item development research (being conducted this spring and summer), field testing in spring 2014, and the first operational year of administration in school year 2014-2015, the *PARCC Accessibility Features and Accommodations Manual* will be revisited to ensure that the accommodations students receive on PARCC assessments do not alter the construct of what is being assessed. This will continue to be revisited in an iterative manner, consistent with best practice.