

**Guidance for IEP and 504 Teams:
Determining Oral Administration
Accommodation Use on
ELA Statewide Assessments**



**South Carolina Department of Education
Office of Assessment
Office of Special Education Services**

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Guidance for IEP and 504 Teams: Determining Oral Administration Use on ELA Statewide Assessments

Introduction

This document is provided to assist individualized education program (IEP) and section 504 teams in making decisions regarding whether the use of oral administration on the English Language Arts (ELA) portion of statewide assessments is appropriate for an individual student.

The IEP and 504 Accommodations Plan team is responsible for determining the allowable accommodations a student needs to *access* statewide assessments. Allowable or standard accommodations are those supports which provide a student access to the assessment. The intent of accommodations is to allow a student to show what they know and can do. Accommodations are not intended to and should not be used to provide a student with an advantage in taking the assessment (i.e. selecting an accommodation for the intent of boosting a student's test score); just because an accommodation is allowable it does not mean the student needs it to access the assessment.

IEP or 504 teams must exercise caution in selecting accommodations for students to use on statewide assessments. An accommodation should not be used on statewide assessments if the accommodation or a similar accommodation (e.g. human reader vs. text-to-speech) has not been used by the student during instruction and classroom assessments throughout the school year. Giving a student an accommodation that has not been used consistently prior to an assessment may put the student at a disadvantage. When a student is unfamiliar with how an accommodation is provided or used, the results of an assessment may be a reflection of the student's ability to use the accommodation and not a reflection of what the student knows and can do. A critical step in the process is the use of data, both to select appropriate, allowable accommodations and to review their effectiveness for a student.

The Individuals with Disabilities Education Act (IDEA) requires that State and Local Educational Agency (LEA) guidelines instruct IEP teams to select, for each assessment, only those accommodations that do not invalidate a score (34 CFR § 300.160_(b)(2)(ii)). Oral administration is a non-standard accommodation and therefore is not an allowable accommodation on the SC READY grade 3 ELA assessment. Non-standard accommodations interfere with the constructs that an assessment is measuring, and yield invalid results. Non-standard accommodations do not give an accurate picture of what a student knows and can do in relation to the standards being assessed.

Oral Administration of the ELA assessment does not interfere with the constructs and is therefore an allowable accommodation on SC READY, grades 4-8. IEP and 504 teams should use the following eligibility criteria when deciding whether a student who is participating in the SC READY grades 4-8 ELA assessment needs oral administration.

Eligibility Criteria

The IEP or 504 team can *consider* oral administration as an accommodation on SC READY ELA assessment in grades 4-8 for students (other than those taking the grade 3 SC READY ELA assessment) who meet the criteria listed below. Oral administration on the ELA portion of statewide assessments should be used by *very few* students. Students who meet the eligibility criteria below are considered non-readers for the purpose of determining oral administration use on ELA assessments. Oral administration on the ELA assessments should not be provided based on a student reading below grade level. Reading below grade level does not indicate that a student is a non-reader. Students develop reading skills at different rates. The development of reading skills at a slower rate than grade-level peers does not indicate that a student is a non-reader. Furthermore, it is important for IEP or 504 teams to consider accommodations for each content test separately. A student who needs access to subject matter content in other areas through oral administration should not automatically be given an oral administration accommodation on the ELA portion of statewide assessments. Many students may need oral administration to access complex, subject-specific terms in science, social studies, or math. However, these same students may not meet the criteria below to consider oral administration on ELA statewide assessments. IEP and 504 teams must remember oral administration on the ELA assessments is for non-readers, not students reading below grade level.

To be eligible to consider the use of oral administration as an accommodation, a student must be participating in the SC READY grades 4-8 ELA and meet **all** of the following criteria:

- A student must either have:
 - blindness or a visual impairment and has not yet learned, or is unable to use braille;
 - a disability that severely limits or prevents the student from accessing printed text, even after varied and repeated attempts to teach the student to do so (i.e., student is unable to decode printed text at any level); or
 - deafness or a hearing impairment and be severely limited or prevented from decoding text due to a documented history of early or prolonged language deprivation.

- Attempts to teach the student basic decoding and reading skills have been repeated and varied.

*Special consideration may be given to students recently blinded through accident or illness who previously learned basic decoding and reading skills, but are now learning to apply those skills to braille code.

- The student receives ongoing, intensive instruction and/or interventions in foundational reading skills.

- The student receives daily instructional accommodations to access printed text in classroom assignments and tests (e.g. textbooks, books for pleasure, and classroom

assessments through the use of a reader, audio recording, text-to-speech support, or an interpreter).

- The student has data to support the effective use of reader, audio recordings, text-to-speech support, or an interpreter. Data which does not support oral administration as an effective accommodation may result in stagnant or reduced ELA scores when the accommodation is used, and/or a low listening comprehension or receptive language score.

Information/Data Considerations

The IEP or 504 team should collect and review relevant data from the student's records and consider this information and data during the decision making process to determine if a student meets the criteria outlined above in the Eligibility Criteria section. In reviewing data, it is important to examine the trend over time; the decision to allow oral administration must not be made based on a single test score, or data point. Whenever possible, IEP and 504 teams should review data from several administrations of an assessment to look at a student's growth over time. In addition to reading performance data, IEP and 504 teams should consider other information on a student, such as the student's processing speed, working memory, and listening comprehension or receptive language skills. Students may meet the eligibility requirements and have reading scores to support the consideration of oral administration, but may not be a good candidate for oral administration of assessments when all data is considered. For example, oral administration may not provide the necessary support for a student to access the assessment if the student has low scores in the area of listening comprehension or receptive language skills. For this reason, it is important for IEP and 504 teams to consider all relevant sources of information on student performance.

The IEP or 504 team must review and discuss multiple sources of information. Sources that the team may consider reviewing include, but are not limited to: psychological evaluation reports, cognitive ability tests, achievement assessments, language assessments, district-wide assessments, individual reading assessments, teacher collected data from classroom observations, progress monitoring data, accommodation usage logs from classroom and statewide assessments, and IEPs or 504 Plans.

The IEP and 504 team should consider (but is not limited to) the following:

- Present levels of academic achievement and functional performance (PLAAFP) and goals for students with IEPs.
- Accommodations and instructional supports used on a daily basis by the student.

The types of services the student currently receives, and the duration and intensity of those services.

- Description of any modifications to the general curriculum or typical instruction and progress data. The student’s instruction should include intensive ongoing intervention in foundational reading skills.
- Past programs and interventions attempted to instruct the student in basic decoding and reading skills, including the amount of time the student spent in the program daily, the length of time the student was in the program, and the successfulness of the intervention.
- Teacher collected data and work samples from classroom instruction and assessments.
- Results of statewide and districtwide assessments.
- Results of individual reading assessments.
- Achievement score data from any other relevant assessments.

NOTE: *Below grade-level reading scores or poor performance on previous assessments alone does not indicate that the oral administration accommodation is necessary to provide access to a statewide ELA assessment.*

How to Use the Appendices

Appendix A: Data Review Collection Form and Appendix B: Review of Eligibility Criteria for Oral Administration on Statewide ELA Assessments Checklist, have been designed to assist teams in collecting and reviewing existing data from various sources in order to determine if oral administration is appropriate to consider as an accommodation on the statewide ELA assessment for an individual student. These appendices may be used both during initial determination and at annual IEP or 504 reviews to document whether the oral administration accommodation is appropriate to consider for a student. The decision regarding accommodations on statewide assessments must be made annually. If the IEP or 504 team determines that a student needs oral administration to access statewide assessments in ELA, this decision must be supported by evidence in the IEP or 504 Plan; this evidence is typically found in the following sections of the student’s IEP: PLAAFP, services, annual goals, classroom accommodations, districtwide and statewide assessments. It is recommended that a copy of Appendix B be maintained with the meeting records as documentation that the accommodations selected are appropriate as required by 20 U.S.C. 144(d)(1)(A)(VI)(aa).

Appendix A: Data Review Collection Form

This form is intended to serve as a tool to assist IEP and 504 case manager/team leads in gathering the existing data which will be needed by the IEP or 504 team to complete the eligibility criteria checklist (e.g., Appendix B) during the IEP or 504 meeting. Since existing data from a variety of sources is reviewed as part of the decision making process, Appendix A provides a way to compile and organize data prior to the IEP or 504 meeting to help streamline the process. Because the oral administration accommodation decision is based on an individual student's need, the IEP or 504 team needs to review various sources of information in order to make a decision. In some cases, not all of the sources of data will be available for an individual student. For example, Appendix A provides a place to record information based on three years of participation in statewide assessments; however, not all students may have three years' of data to review. Case manager/team leads and IEP or 504 teams should make every effort to review all the relevant data available for a student. The optimal use of Appendix A occurs prior to an IEP or 504 meeting in which oral administration may be considered as an accommodation on a statewide ELA assessment. Since oral administration on a statewide ELA assessment is intended for the *very few* students who are non-readers, case manager/team leads should only use Appendix A to compile this data for the few students for whom oral administration may be appropriate.

NOTE for IEP Teams: *Most of the information an IEP team needs to review to make a determination about eligibility for use of oral administration on a statewide ELA assessment can be located within a well written, thorough IEP.*

Appendix B: Review of Eligibility Criteria for Oral Administration on Statewide ELA Assessments Checklist

This tool is used during the IEP or 504 meeting with all members of the IEP or 504 team participating in the discussion. Appendix B is a checklist style form which is completed by reviewing the data collected in Appendix A as well as other portions of the IEP or 504 plan to answer a series of eligibility criteria questions. When completing the Appendix B checklist, IEP or 504 teams should review the data or information cited as sources of evidence for each question. , the team should review and discuss the data or information, come to consensus, and mark the decision on the Appendix B checklist. After data and responses for all questions have been reviewed, the IEP or 504 team should determine if oral administration on the ELA statewide assessment should be considered for the student. It is important to remember that answering yes to all the questions on the checklist does not automatically mean a student should receive oral administration. It means it is appropriate for the IEP or 504 team to consider the accommodation. After further discussion and based on an individual student's needs as well as learning characteristics, the IEP or 504 team may decide that the oral administration accommodation is not the right support for a student to access the assessment, and may instead look for other accommodations to support the student's access to the assessment. If an IEP or 504 team has answered no to any of the questions on the checklist, the student does not meet the

eligibility requirements to receive oral administration on an ELA statewide assessment. In this case, an IEP or 504 team should consider other accommodations to provide access to the English 1 or ELA statewide assessment for the student. Students who do not meet eligibility requirements should not receive oral administration on an ELA statewide assessment. It is important for IEP and 504 teams to remember that simply performing below grade level in reading does not meet the eligibility requirements.

Appendix A:
*Data Review
Collection Form*

Data Review Section

Directions:

Based on a variety of sources available, complete the following Data Review Collection Form in its entirety. This collected data should be brought to the IEP or 504 team meeting and reviewed when determining if oral administration on a statewide ELA assessment should be considered.

NOTE: Depending on the individual student, some data may not be available. It is the responsibility of the IEP team to ensure that a comprehensive review of data is considered when determining eligibility. The information must be documented on the Data Collection Tool and any applicable information must be noted in the PLAFFP section of the student's IEP.

Cognitive Ability Assessments:

Assessment 1: _____ Date: _____

Full Scale Score: _____ Verbal Scale Score: _____ Non-Verbal Scale Score: _____

Other relevant psychological processing scores:

Processing Speed Score: _____ Working Memory Score: _____

Receptive Language Score: _____

Assessment 2: _____ Date: _____

Full Scale Score: _____ Verbal Scale Score: _____ Non-Verbal Scale Score: _____

Other relevant psychological processing scores:

Processing Speed Score: _____ Working Memory Score: _____

Receptive Language Score: _____

Standardized Achievement Assessments:

Assessment 1: _____ Date: _____

Reading Total: _____ Percentile: _____ SS*: _____ GE**: _____

Basic Reading Skills: _____ Percentile: _____ SS: _____ GE: _____

Reading Fluency: _____ Percentile: _____ SS: _____ GE: _____

Reading Comprehension: _____ Percentile: _____ SS: _____ GE: _____

Listening Comprehension: _____ Percentile: _____ SS: _____ GE: _____

Assessment 2: _____ Date: _____

Reading Total: Percentile: _____ SS*: _____ GE**: _____
Basic Reading Skills: _____ Percentile: _____ SS: _____ GE: _____
Reading Fluency: _____ Percentile: _____ SS: _____ GE: _____
Reading Comprehension: _____ Percentile: _____ SS: _____ GE: _____
Listening Comprehension: _____ Percentile: _____ SS: _____ GE: _____

**Individual or Group Achievement Standardized Assessments
(District/Local and State):**

District Reading Assessments (e.g., MAP)

Date Administered (Month and Year): _____

Assessment: _____

Percentile: _____ SS*: _____ GE**: _____

RIT Score (if applicable): _____

Lexile: _____

Accommodations Provided:

Date Administered (Month and Year): _____

Assessment: _____

Percentile: _____ SS*: _____ GE**: _____

RIT Score (if applicable): _____

Lexile: _____

Accommodations Provided:

Date Administered (Month and Year): _____

Assessment: _____

Percentile: _____ SS*: _____ GE**: _____

RIT Score (if applicable): _____

Lexile: _____

Accommodations Provided:

Statewide ELA Assessments:

Date Administered (Month and Year): _____

Assessment: _____

Grade: _____ Achievement Level: _____ Scale Score: _____ Lexile: _____

Accommodations Provided:

Date Administered (Month and Year): _____

Assessment: _____

Grade: _____ Achievement Level: _____ Scale Score: _____ Lexile: _____

Accommodations Provided:

Date Administered (Month and Year): _____

Assessment: _____

Grade: _____ Achievement Level: _____ Scale Score: _____ Lexile: _____

Accommodations Provided:

Other Reading Achievement Assessments (e.g., Progress Monitoring Curriculum Based Measurements):

Date: _____ Assessment: _____

Results: _____

Percentile (if available): _____

Date: _____ Assessment: _____

Results: _____

Percentile (if available): _____

Date: _____ Assessment: _____

Results: _____

Percentile (if available): _____

Date: _____ Assessment: _____

Results: _____

Percentile (if available): _____

Other Informal or Formal Reading Achievement Assessments (e.g., Informal Reading Inventories):

Date: _____

Assessment: _____

Percentile: _____ SS*: _____ GE**:

Results: _____

Accommodations Provided:

Date: _____

Assessment: _____

Percentile: _____ SS: _____ GE: _____

Results: _____

Accommodations Provided:

Date: _____

Assessment: _____

Percentile: _____ SS: _____ GE: _____

Results: _____

Accommodations Provided:

* *SS = Standard Score*

***GE=Grade Equivalence*

Appendix B:
*Review of Eligibility
Criteria for Oral
Administration on
Statewide ELA
Assessments Checklist*



Review of Eligibility Criteria for Oral Administration on Statewide ELA Assessments Checklist

Student Name:	
Date of Birth:	
IEP Category of Disability:	
Grade:	
Date of Review:	

Which assessment did the student participate in last year?

General Assessment
 Alternate Assessment
 New to state (Assessment in previous state) Specify: _____

<i>Eligibility Criteria</i>	<i>YES (Agree) NO (Disagree)</i>
The student has an Individualized Education Program (IEP) or 504 Accommodations Plan.	<input type="checkbox"/> YES <input type="checkbox"/> NO
The student has: <ul style="list-style-type: none"> • blindness or a visual impairment and has not yet learned, or is unable to use braille, or • a disability that severely limits or prevents him/her from accessing printed text, even after varied and repeated attempts to teach the student to do so (<u>i.e., student is unable to decode printed text at any level</u>), or • deafness or a hearing impairment and is severely limited or prevented from decoding text due to a documented history of early or prolonged language deprivation. 	<input type="checkbox"/> YES <input type="checkbox"/> NO

✗ *If the response is **NO** to either of these statements, the IEP team should not complete the remainder of the form and instead determine how the student will participate in the general assessment with other accommodations, if necessary.*

*If the response is **YES** to both of these statements, use the following checklist to assist the team in reviewing appropriate sources of evidence to determine if oral administration of the ELA assessment should be considered as an accommodation.*

The student must meet all eligibility criteria to consider the use of oral administration on the ELA portion of statewide assessments.

Eligibility Criteria	Possible Sources of Evidence	Data Reviewed
<p>Attempts to teach the student basic decoding and reading skills have been repeated and varied.</p> <p><input type="radio"/> YES</p> <p><input type="radio"/> NO</p>	<p>Review of reading programs in which the student has participated, including- frequency and duration of time the student used the program, performance and growth.</p> <ul style="list-style-type: none"> • General education intervention data (e.g. RtI, MTSS tiers 1 &2, etc.) • PLAAFP section of the IEP • Informal Assessment (CBMs) data • IEP goal progress data 	
<p>The student receives ongoing, intensive instruction and/or interventions in foundational reading skills.</p> <p><input type="radio"/> YES</p> <p><input type="radio"/> NO</p>	<p>A review of the student’s IEP to include:</p> <ul style="list-style-type: none"> • amount of daily services the student receives to support progress in reading goals • service and instructional delivery models • annual goals <p>A review of the student’s 504 plan to include:</p> <ul style="list-style-type: none"> • life activities that are substantially limited. If a student with a 504 needs oral administration because they cannot decode, has an IDEA referral been considered? 	

Eligibility Criteria	Possible Sources of Evidence	Data Reviewed
<p>The student receives daily instructional accommodations to access printed text in classroom assignments and tests (e.g. textbooks, books for pleasure, and classroom assessments) through the use of a reader, audio recording, text-to-speech support, or an interpreter.</p> <p><input type="radio"/> YES</p> <p><input type="radio"/> NO</p>	<p>Review of how student accesses printed text on a daily basis:</p> <ul style="list-style-type: none"> • a review of subscription services such as Learning Ally or Bookshare. • use of an HTML version of textbooks that supports use of a screen reader to access content. • use of a screen reader or speech-to-text software. • use of audio books <p>A review of the student’s IEP to include:</p> <ul style="list-style-type: none"> • special factors (e.g., AT) section • accommodations and modifications section • district and state assessment sections <p>A review of the student’s 504 plan accommodations for daily instruction.</p>	
<p>The student has data to support the effective use of reader, audio recordings, text-to-speech support, or an interpreter. Data which does not support oral administration as being an effective accommodation may involve stagnant or reduced ELA scores when the accommodation is used, and/or a low listening comprehension or receptive language score.</p> <p><input type="radio"/> YES</p> <p><input type="radio"/> NO</p>	<p>Review and comparison of a student’s reading comprehension performance with and without oral administration.</p> <ul style="list-style-type: none"> • State and district test results • Formative classroom assessments • Curriculum based measurements • Accommodations usage log 	

If the response is NO for any of the eligibility criteria or considerations, the IEP/504 team should determine how the student will participate in the general assessment with other accommodations, if necessary.

If the response is YES to all criteria and considerations, the IEP or 504 team should consider if oral administration on the ELA portion is an appropriate accommodation to provide a student access to statewide assessments.

Additional Considerations

The IEP/504 Team certifies the following statements about the student’s eligibility decision to be true:

- It is **NOT** based on a specific categorical label or educational placement.
 - It is an IEP team decision and is **NOT** being made for administrative purposes and/or in anticipation of impact on school or district accountability results.
 - It is **NOT** based solely on the fact that the student’s instructional reading level is below the grade level of the general assessment.
 - It is **NOT** based on the fact that the student is expected to perform poorly on the general assessment.
- YES, these statements about the student’s eligibility decision are true.**
- NO, these statements about the student’s eligibility decision are not accurate.**

Note: The IEP/504 team must certify “yes, these statements about the student’s eligibility decision are true” in order for the student to be eligible for oral administration on statewide ELA assessments.