

## **High School to College Transition for Students with Specific Learning Disabilities**

### **Best Practice Documentation Guidelines for Colorado Postsecondary Institutions**

#### **History**

The agencies that provide services to adults with disabilities, including vocational rehabilitation services, developmental disabilities services, and colleges/universities require sufficient and specific documentation of a disability in order to determine eligibility for accommodations. The gap between the information requested by adult agencies and that available through the K-12 education system has been a topic of discussion for many years. Guidance provided by the National Association on Higher Education and Disability (AHEAD), the National Division on Career Development and Transition (DCDT), the Colorado Department of Education, and the Colorado/Wyoming Consortium of Support Programs for Students with Disabilities has been helpful in many ways. Still, the challenge for students and parents to locate and gather the necessary documentation and demonstrate eligibility for accommodations remains.

In January, 2008, a stakeholder group facilitated by the Denver Office of Economic Development Youth Transitions Grant and composed of the Grant Coordinator, Colorado Department of Education consultants, secondary school educators, school psychologists, Colorado Special Education Advisory Committee (CSEAC) parent representative, and college/university disability office directors gathered to discuss ways to bridge the documentation gap for students with learning disabilities as they attempt to demonstrate eligibility for accommodations in higher education. The Transition to Higher Education (THE) Work Group focused exclusively on students with learning disabilities because these students in particular need strong data to prove the presence of a disability. Often, this data is difficult or extremely costly to access outside of the secondary school system if documents provided, such as the Individual Education Program (IEP), are found to be insufficient to prove eligibility for accommodations.

#### **Current Challenges and Opportunities**

Although the documentation gap has been present for many years, it could be further compounded by the changes in the federal law, Individuals with Disabilities Education Act (IDEA 2004). These changes resulted in revision to the Colorado Rules for the Administration of the Exceptional Children's Educational Act (ECEA) related to Specific Learning Disability (SLD) eligibility criteria. IDEA 2004 states the following:

...the [eligibility] criteria adopted by the State...

- (1) Must not require the use of a severe discrepancy between intellectual ability and achievement for determining whether a child has a specific learning disability...
- (2) Must permit the use of a process based on the child's response to scientific, research-based intervention... and
- (3) *A public agency must use the State criteria adopted under IDEA 2004, section 300.307.*

Also in the Federal Register is a statement that any State, as is the case in Colorado, may prohibit the use of IQ/Achievement discrepancy as a criterion for SLD eligibility.

Colorado's revised SLD eligibility criteria requires, in part, a body of evidence demonstrating academic skill deficits and insufficient progress in response to scientific, research-based intervention in one or more of the 8 specified areas. All special education districts, BOCES and State Operated Programs were required through Colorado ECEA Rules to implement these revised criteria no later than 8/15/10. A child's response to intervention in an area of concern (in order to determine sufficiency of progress) leads to the provision of high quality intervention and frequent monitoring of progress.

The change in IDEA legislation and Colorado ECEA Rules means that disability service offices in higher education will begin to receive special education records that appear different from those in the past. This change in secondary education, along with continued concern about students with learning disabilities being able to demonstrate eligibility for accommodations in higher education, prompted this group to develop the following guidelines for secondary educators that will meet the requirements of RTI and also provide the documentation disability service offices need.

### **Key Elements of SLD Eligibility Determination**

Students from a public secondary education setting identified with a Specific Learning Disability have a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations, including conditions such as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia and developmental aphasia. Specific Learning Disability does not include problems that are primarily the result of: visual, hearing, or motor disabilities; significant limited intellectual capacity; significant identifiable emotional disability; cultural factors; environmental or economic disadvantage; or limited English proficiency. The Specific Learning Disability prevents a student from receiving reasonable educational benefit from general education alone (Colorado ECEA 2.08(6)).

Typically, the Response to Intervention (RtI) process would take place prior to a referral to special education evaluation as part of a system commonly referred to as RtI/Problem-Solving. As a general education system, RtI/Problem-Solving identifies students who are not meeting grade level standards and provides increasingly intense intervention based on student-centered data. Low achievement and insufficient progress, even with intense intervention, may lead to a referral for a special education evaluation.

The review of existing information on a referred student includes any data collected during the RtI process. This data also becomes part of the ***Body of Evidence*** in demonstrating that a child meets the criteria for eligibility. Full scale IQ testing is not required to determine the presence of a learning disability under the RtI model. Instead, a multidisciplinary team will use RtI process data and diagnostic/prescriptive assessment results to determine if a student has a specific learning disability (SLD) in basic reading skills, reading fluency skills, reading comprehension, written expression, mathematical calculation, mathematical problem-solving, oral expression, and/or listening comprehension.

## **THE Work Group Recommendations for Postsecondary Disability Services Providers**

Schools use an extensive process and well trained professionals to determine eligibility for special education. It is important to understand that most of the information requested by postsecondary disability services offices may already be included in a student's evaluation reports, body of evidence used to determine eligibility for special education, IEPs, and Summary of Performance or could easily be incorporated into existing paperwork. In most cases additional testing is not required.

Disability service providers are encouraged to consider using structured interview processes with students to fill in gaps that may exist in documentation. A detailed interview can be very credible and accountable. The information disclosed by the student can help draw out enough information for a Disability Service Coordinator to make a professional judgment call regarding eligibility for reasonable accommodations based on disability.

### **What You Might Receive**

- High school documentation to support a student's accommodations request should include: Individualized Education Program (IEP) documents and evaluation summaries; pertinent reports and evaluations to document a Specific Learning Disability (SLD); justification for accommodations used by the student; the Summary of Performance Report, and any reports or evaluations from outside medical professionals. This documentation forms the *body of evidence* to support the identification of SLD and appropriate planning.
- In most cases, a licensed school psychologist would be involved in any of the above processes and appropriate signature and credentials would be included on the documentation. Evidence of participation by a school psychologist or other qualified professional (speech-language pathologist, reading specialist) will appear on the Disability Determination Form, in the Present Level of Academic Achievement and Functional Performance (PLAAFP), or individual reports.
- Although IQ or global cognitive ability scores may not be included in the documentation, the student's file should include scores from other standardized, norm-referenced tests addressing academic skill level and deficits. These could include, but are not limited to:
  - Test of Written Language (TOWL)
  - Test of Word Reading Efficiency (TOWRE)
  - Test of Silent Word Reading Fluency (TOSWRF)
  - Gray Oral Reading Test (GORT)
  - Key Math
  - Spelling Performance Evaluation for Language & Literacy (SPELL)
  - Stanford Diagnostic Mathematics Test
  - Curriculum Based Measurement (CBM) (such as AIMS web)
  - Wide Range Achievement Battery (WRAT)
  - DRP (sub test of the *Language!* Curriculum)
  - Woodcock-Johnson and/or Wechsler sub-tests
  - ACT and/or SAT
  - CSAP

- The student’s file may also include a record of the interventions used to address the student’s learning needs prior to being identified as qualifying for special education services. This may be reflected in standardized curriculum based measures (CBMs) which document the effectiveness of these interventions. Graphs may be included (aim line vs. current functioning) with a list of attempted interventions and their results.

Included in this document is a useful handout that can be copied and provided to incoming students and their parents to assist them in gathering the necessary documentation from schools and private providers. See Recommended Documentation Checklist.

### **If Documentation is Not Sufficient**

Before requiring additional testing for eligibility, which could be cost prohibitive for some students, carefully consider what information is needed and if that information can be found in existing documents. OCR findings and case law discourage institutions from using burdensome proof-of-disability criteria that preclude or unnecessarily discourage individuals with disabilities.

It is important to note, IDEA clearly states schools are under no obligation to conduct testing for the purpose of eligibility for services in another system, such as vocational rehabilitation or postsecondary education.

If the packet presented by the student does not include documentation sufficient to determine eligibility for the requested accommodations, service coordinators may ask for supporting documentation that was used by the IEP team to determine the student’s disability, eligibility for special education services, and the services provided in the IEP. It would be helpful to give examples – “the best way to provide that information would be...”

When you have a number of students entering from the same district or high school, it may be helpful to establish a relationship with the counseling office and special education staff. Having an assigned staff person in each high school that is knowledgeable about eligibility requirements for postsecondary accommodations would be helpful to guide this process and provide consistency in working with colleges.

### **Considerations for Professional Development**

- CDE has outlined the SLD eligibility and identification process in the *Guidelines for Identifying Students with Specific Learning Disabilities* (available at the following website: [http://www.cde.state.co.us/cdesped/download/pdf/SLD\\_Guidelines.pdf](http://www.cde.state.co.us/cdesped/download/pdf/SLD_Guidelines.pdf)).
- Training for higher education staff to delineate and understand norm referenced and program monitoring data might be critical now that the revised SLD criteria has replaced the IQ/Achievement discrepancy formula.

## References

Colorado Department of Education (2008) *Guidelines for Identifying Students with Specific Learning Disabilities*. Retrieved from [http://www.cde.state.co.us/cdesped/download/pdf/SLD\\_Guidelines.pdf](http://www.cde.state.co.us/cdesped/download/pdf/SLD_Guidelines.pdf)

United States Department of Education (2004) *Individuals with Disabilities Education Act (IDEA)*. Retrieved from <http://idea.ed.gov/>

Colorado Department of Education (2008) *Rules for the Administration of the Exceptional Children's Educational Act (ECEA)*. Retrieved from <http://www.cde.state.co.us/spedlaw/download/ECEARules2008.pdf>

National Division on Career Development and Transition (DCDT). <http://dcdt.org/>

National Association on Higher Education and Disability (AHEAD). <http://www.ahead.org/>

## THE Work Group Recommended Documentation Checklist

The following items can be found in a student's IEP records and in his/her Summary of Performance. These items are helpful to post-secondary disability service staff when determining eligibility for accommodations in post-secondary education institutions.

- Evaluation reports used to document a student's eligibility or re-eligibility for special education services.
  - ✓ Report should indicate age appropriate assessments used to determine SLD with interpretation of scores that reflect grade level (vs. raw score). Norm referenced assessments could include:
    - Test of Written Language (TOWL)
    - Test of Word Reading Efficiency (TOWRE)
    - Test of Silent Word Reading Fluency (TOSWRF)
    - Gray Oral Reading Test, Key Math
    - SPELL Spelling Performance Evaluation for Language & Literacy
    - Stanford Diagnostic Mathematics Test
    - Wide Range Achievement Battery (WRAT)
    - DRP (sub-test of the Language! Curriculum)
    - Woodcock-Johnson and/or Wechsler sub-tests
    - ACT and/or SAT
    - CSAP
  - ✓ Include CBM (curriculum based measures) graphs (aim line vs. current functioning), a list of attempted interventions and results and academic achievement scores with percentiles.
- The SLD Determination Form (and other Determination Forms for additional disabilities if applicable)
- Disability documentation from outside professionals
- Accommodation Information
  - ✓ Justification for accommodations including changes as noted in PLAAF section of IEP.
  - ✓ Indicate accommodations applicable to a post-secondary setting in the IEP (see Addendum A for list of possible post-secondary accommodations).
- ACT accommodations request and approval letter from ACT (not State or local)
- Most recent IEP and triennial IEP
- Summary of Performance (SOP) or SOP Portfolio
- Secondary foreign language waiver and rationale, if applicable