



Avoiding Unintended Consequences of Improved Accessibility of State Tests

Assessment accommodations are used to meet the individualized needs of students with disabilities so that they can show what they know and can do on assessments, including state content tests (e.g., reading/language arts, math) used for accountability.¹ Assessment accommodations are changes in the presentation, response, timing, and scheduling of tests that do not change what the test is measuring (AERA, APA, NCME, 2014).

¹In many states, English learners can also use accommodations on these tests.

In the past, only accommodations were recognized as a way to increase the accessibility of tests for students with disabilities, including English learners with disabilities.

Because of the importance of accommodations in meeting the accessibility needs of students with disabilities, the 2004 reauthorization of the Individuals with Disabilities Education Act (IDEA) required that states annually report the numbers of students with disabilities who were assigned assessment accommodations by their Individualized Education Program (IEP) teams. These numbers are reported for reading/language arts and mathematics general state assessments used for accountability to the Office of Special Education Programs (OSEP) (Rudick et al., 2023).

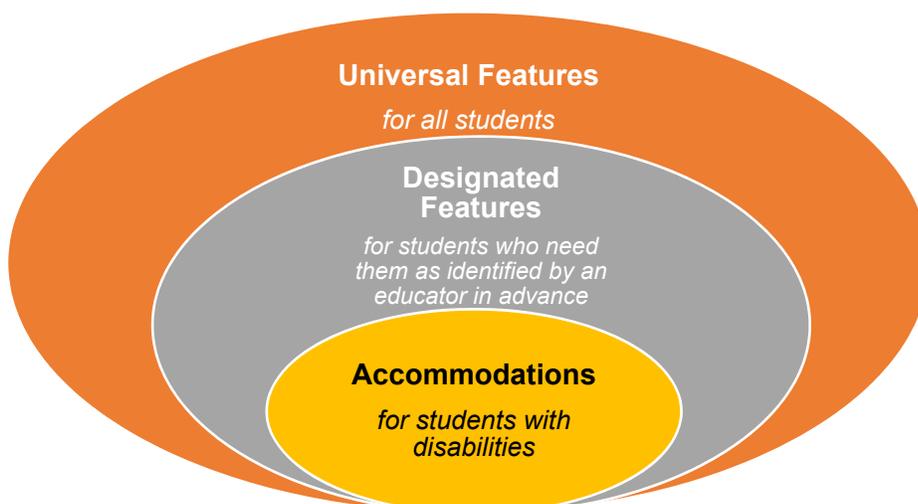
In the 2010s, as many states moved to technology-based assessments, states expanded their approach to providing accessibility through a paradigm shift in which they recognized that students other than those with disabilities also had accessibility needs (Larson et al., 2020). The paradigm shift involved the identification of levels of accessibility (e.g., universal features, designated features, and accommodations) (see Figure 1). Although the terms and the number of levels differed among states, the levels were similar: universal features were features available to all students; designated features were changes available to students for whom an adult or decision-making team had indicated a need;

and accommodations were those changes that were available only to students with disabilities. Some states included a fourth level called administrative considerations. Most levels could include features either embedded in the test platform or external to it (e.g., provided by a human).

With this paradigm shift, many states revised and refined their accommodations policies. One consequence of the paradigm shift was that states' accommodation policies often were broadened to become "accessibility policies." Over time, many accommodations were moved to be either designated features or universal features. A consequence of the paradigm shift was that many accessibility features that once were accommodations now were available to students without disabilities; and those with disabilities who previously had been assigned them as accommodations now accessed many of them as universal or designated features. In many states, this shift reduced the number of allowed accommodations. With this reduction in the number of allowed accommodations in state policies, there was the potential for decreased numbers of students assigned accommodations.

The purpose of this Brief is to examine data on assigned accommodations that states report to the U.S. Department of Education. It also explores the implications of the paradigm shift for states and students with disabilities. We

Figure 1. Levels of Accessibility in the Paradigm Shift



highlight what states and IEP teams can do to avoid possible unintended consequences of the paradigm shift (e.g., “inaccurate” state data, IEPs that do not reflect all of a student’s accessibility needs).

Accommodations Data

Data on the number of students with disabilities assigned accommodations have been quite variable across states since they were first required to report those data. For example, in school year 2008-09, the percentage of students with disabilities assigned accommodations in the 50 states for grade 3 math ranged from 14.5% to 92.6% and for grade 8 math ranged from 7.6% to 93.9% (Vang et al., 2012). The percentages for reading in the same year ranged from 0.5% to 92.4% in grade 3 and from 0.5% to 93.8% in grade 8. In the most recent year’s publicly available data (2021-22), the percentage of students with disabilities assigned accommodations in the 50 states for grade 3 math ranged from 0.2% to 83.6% and for grade 8 math ranged from 0.4% to 95.7% (Wu et al., 2024). For reading in the same year, the percentages ranged from 0.3% to 80.1% in grade 3 and from 0.3% to 95.7% in grade 8. The variability among states seems to have increased

in the most recent years’ data.

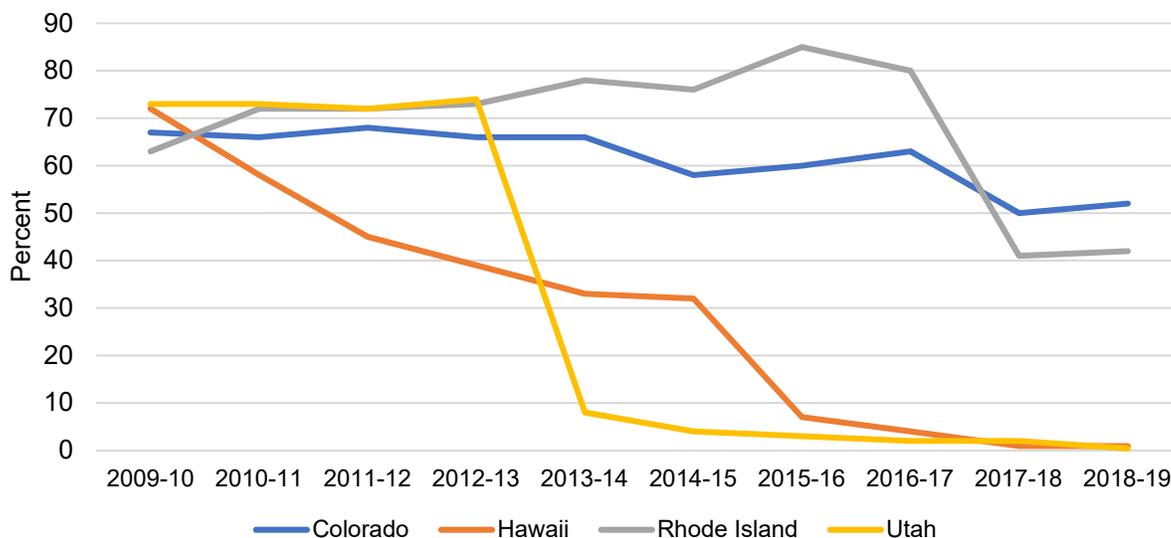
To examine trends across 10 years (2009-10 through 2018-19),² we identified states that had data for all 10 years (n = 19). We then examined the trends in the percentages of students with disabilities assigned accommodations for grade 6 math assessments.

Some of the 19 states with data for 10 years did not show consistent trends (n = 9); two states showed stable percentages and four states showed increases in the percentages of students assigned accommodations. Additionally, four states showed drops in the percentages of students assigned accommodations across years, possibly due to the paradigm shift (see Figure 2).

When reporting data about accommodations, states with drops in the percentages of students with disabilities assigned accommodations may be concerned that it looks like they have decreased the accessibility of their assessments. States with large decreases in the numbers of students assigned accommodations indicated that they had moved what were formerly called

²States were not required to report data in 2019-20, and many states’ data for 2020-21 were considered questionable because of low assessment participation rates (see Wu et al., 2023).

Figure 2. States with Drops in the Percentages of Students Assigned Accommodations for Math (Grade 6) from 2009-10–2018-19



Note: The data for 2009–10 through 2016–17 in the figure were derived from Wu et al. (2020). Data for 2017–18 were derived from Wu et al. (2021), and data for 2018–19 were derived from Wu et al. (2022).

accommodations into either the designated features or universal features tier.

It is also possible that there is variation across states in how they are reporting the data to the U.S. Department of Education. Some states might include many or all of their accessibility features when they report on the number of students assigned accommodations while other states may not. It is impossible to tell from the available data whether any states included universal features or designated features as well as accommodations when reporting to the U.S. Department of Education the number of students who were assigned accommodations.

What States Can Do

Although the accommodations paradigm shift is a positive approach to expanding accessibility to address the needs of all students, it can have negative consequences for students and states. States or districts might decide to eliminate from their IEP forms any former accommodations that have been shifted to designated features or universal features. This might make completing an IEP form easier but potentially could have negative consequences for students. If a needed universal feature or designated feature is not documented in the IEP, the student may not have access to needed accessibility during instruction and assessment. Further, when universal features and designated features are not documented on the IEP, the need for them might not be recognized when a student transitions to postsecondary education and training or work environments.

A potential negative consequence for states is that their data on the percentage of students assigned accommodations may see drops when policies shift former accommodations to either designated or universal features. This drop could potentially result in the state's data being flagged by the U.S. Department of Education. The Department flags data that are below the lowest quartile of all data submitted (Rule ID PartB-Assess-069). It collects data notes and explanations to include with the publicly available data.

States should consider taking several actions to avoid the possible negative consequences of the paradigm shift and the subsequent changing of their accessibility policies:

- Require IEP teams to document and report on needed designated features and universal features on each student's IEP.
- Keep track of the number of students with disabilities assigned designated features and, if possible, universal features for testing.
- When reporting on the numbers of students with disabilities assigned accommodations, indicate whether other accessibility features (e.g., designated features, universal features) are included in the numbers reported. If they are included, add a note to indicate that the number of students assigned accommodations includes students receiving other accessibility features. If these students are not included in the reported data, if possible, add a note about the number of students with disabilities assigned designated features and universal features.
- Provide training to district and school personnel on the paradigm shift and its implications for students with disabilities, as well as on what districts should do to document students' accessibility needs.
- Provide training to IEP team members on the importance of documenting all accessibility features on IEPs.
- Provide training materials to districts to use with educators to ensure students with disabilities are familiar with and have experience in the classroom and on practice tests using accessibility features that will be provided during testing.
- Provide information to districts to share with parents about the paradigm shift and how their child's need for accessibility features will be met and documented.

What IEP Teams Can Do

To avoid the possible negative consequences of the paradigm shift, IEP teams should consider

implementing these processes:

- Document all needed accessibility features on the student's IEP for each assessment so that everything a child needs is transparent.
- Ensure that students with disabilities are familiar with all available accessibility features they may use during testing.
- Check that each student with disabilities uses documented accessibility features and accommodations during instruction and assessment.

Conclusions

Changes in approaches to meeting the accessibility needs of students with disabilities and other students as a result of the paradigm shift have dramatically improved the accessibility of assessments for all students and students with disabilities. Still, the paradigm shift, along with its implementation and states' moving former accommodations to either designated features or universal features, can have negative consequences for states and students. Recognizing the potential for negative consequences and systematically identifying ways to avoid those consequences is important for states, districts, IEP teams, and students.

References

AERA, APA, & NCME. (2014). *Standards for educational and psychological testing*. AERA.

Larson, E. D., Thurlow, M. L., Lazarus, S. S., & Liu, K. K. (2020). Paradigm shifts in states' assessment accessibility policies: Addressing challenges in implementation. *Journal of Disability Policy Studies*, 30(4), 244-252.

Rudick, A., Long, T., & Nagle, K. (2023). *IDEA assessment data display tool for SPP/APR indicator 3*. IDEA Data Center. <https://ideadata.org/resources/resource/2874/idea-assessment-data-display-tool-for-sppapr-indicator-3>

Vang, M., Thurlow, M., & Altman, J. (2012). *2008-2009 APR snapshot #2: Assessment accommodations use by special education students*. National Center on Educational Outcomes.

<https://nceo.info/Resources/publications/APRsnapshot/Accommodations/default.html>

Wu, Y.-C., Lazarus, S. S., Albus, D. A., & Liu, K. K. (2020). *Trends in accommodations assigned on general state assessments used for accountability from 2007-08 to 2016-17 (Data Analytics #13)*. National Center on Educational Outcomes. [z.umn.edu/9g57](https://nceo.info/Resources/publications/APRsnapshot/brief25)

Wu, Y.-C., Liu, K. K., & Lazarus, S. S. (2022). *2018-2019 APR snapshot #25: Students in special education assigned assessment accommodations*. National Center on Educational Outcomes. <https://nceo.info/Resources/publications/APRsnapshot/brief25>

Wu, Y.-C., Liu, K. K., Lazarus, S. S., & Thurlow, M. L. (2021). *2017-2018 APR snapshot #23: Students in special education assigned assessment accommodations*. National Center on Educational Outcomes. <https://nceo.info/Resources/publications/APRsnapshot/brief23>

Wu, Y.-C., Liu, K. K., Lazarus, S. S., & Thurlow, M. L. (2023). *2020-2021 APR snapshot #29: Students in special education assigned assessment accommodations*. National Center on Educational Outcomes. <https://nceo.info/Resources/publications/APRsnapshot/brief29>

Wu, Y.-C., Thurlow, M. L., Liu, K. K., & Lazarus, S. S. (2024). *2021-2022 APR snapshot #31: State assessment participation, performance, and assigned accommodations for students receiving special education services*. National Center on Educational Outcomes.

NCEO Brief #35, May 2024

The authors of this Brief were Martha L. Thurlow, Andrew R. Hinkle, Sheryl S. Lazarus, and Kristin K. Liu.
NCEO Director, Sheryl Lazarus; NCEO Assistant Director, Kristin Liu

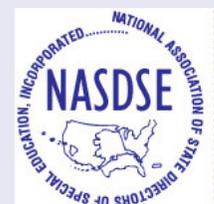
All rights reserved. Any or all portions of this document may be reproduced and distributed without prior permission, provided the source is cited as:

Thurlow, M. L., Hinkle, A. R., Lazarus, S. S., & Liu, K. K. (2024, May). *Avoiding unintended consequences of improved accessibility of state tests* (NCEO Brief #35). National Center on Educational Outcomes.

The Center is supported through a Cooperative Agreement (#H326G210002) with the Research to Practice Division, Office of Special Education Programs, U.S. Department of Education. The Center is affiliated with the Institute on Community Integration at the College of Education and Human Development, University of Minnesota. Consistent with EDGAR §75.62, the contents of this report were developed under the Cooperative Agreement from the U.S. Department of Education, but do not necessarily represent the policy or opinions of the U.S. Department of Education or Offices within it. Readers should not assume endorsement by the federal government.

Project Officer: David Egnor

NCEO works in collaboration with Applied Engineering Management (AEM), Center for Parent Information & Resources (CPIR), Council of Chief State School Officers (CCSSO), National Association of State Directors of Special Education (NASDSE), and WestEd.



This publication is available in alternative formats upon request. Direct requests to:

National Center on Educational Outcomes
University of Minnesota
2025 East River Parkway, Room 1-330
Minneapolis, MN 55414

Phone 612/626-1530



INSTITUTE on COMMUNITY INTEGRATION

UNIVERSITY OF MINNESOTA

Visit our website at www.nceo.info

The University of Minnesota is an equal opportunity employer and educator.