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To Whom It May Concern:

Thank you for the opportunity to comment on the Draft PARCC Accommodations Manual. We acknowledge the work that PARCC has accomplished to date in developing this comprehensive manual and appreciate your responsiveness to feedback from the field as well as your willingness to engage in an ongoing dialogue on these issues. We look forward to continuing to work with you toward the goal of ensuring that the PARCC assessments are fair and equitable and that all students have meaningful opportunities to demonstrate what they have learned with respect to the Common Core State Standards (CCSS).

We would like to share our expertise as an organization that works to expand learning opportunities and outcomes for all individuals through Universal Design for Learning (UDL). CAST has defined the principles and practices of UDL, which guides the design of flexible instructional goals, methods, materials, and assessments that consider from the outset the diversity and natural variability of learners in any educational setting. These principles and practices were incorporated into the Higher Education Opportunity Act (HEOA) of 2008. When applying the principles of UDL, we believe that instruction represents the entire episode of learning—i.e., the assessment-instructional cycle.

CAST is known for its development of innovative, technology-based educational resources and strategies based on universal design and the principles of UDL. For example, CAST created Bobby, the first software to check website accessibility and guide Web designers to make improvements; WiggleWorks (with Scholastic), the first universally designed literacy program for beginning readers; and CAST eReader, one of the first computer-based literacy tools to give learners full access to e-text while supporting and enhancing their literacy development. Additionally, CAST held an instrumental role in the development of the National Instructional Materials Accessibility Standard (NIMAS) and currently leads the National Accessible Instructional Materials (AIM) Center. CAST has also partnered with the University of Kansas and NASDSE in the federally supported Center on Online Learning and Students with Disabilities and

serves as the lead partner (with Vanderbilt University) in the federally funded National Center on the Use of Emerging Technologies to Improve Literacy Achievement for Students with Disabilities in Middle School.

Through strategic collaborations, CAST continues to work on behalf of all learners, especially those with disabilities, by seeding the fields of education research, policy, professional development, and product development with UDL-based solutions. Based on CAST's extensive experience in universal design and the principles of UDL, we offer the following comments on the **Draft PARCC Accommodations Manual**:

While we believe that the overall manual represents a major step forward, we would like to highlight the following four areas of concern:

- Conflation of the terms Universal Design (UD) and Universal Design for Learning (UDL);
- Potential for inequitable implementation of accessibility features and the Personal Needs Profile (PNP);
- Construct irrelevance in relation to the over-restrictiveness of the special access accommodations; and
- Impact of assessment on instruction.

Conflation of the Terms Universal Design (UD) and Universal Design for Learning (UDL)

Page 16 of the manual provides an extensive discussion of the concept of Universal Design. While we applaud the manual developers for prioritizing this concept as part of the process of ensuring fair and equitable access for all students, we would like to clarify one point of confusion. The discussion appears to use the terms "Universal Design" and "Universal Design for Learning" interchangeably. These two terms are related; however, they have different meanings. The term "Universal Design" is defined in the Individuals with Disabilities Education Act (IDEA) and the Higher Education Opportunity Act (HEOA) as having the same definition as that found in the Assistive Technology Act of 1998:

The term "universal design" means a concept or philosophy for designing and delivering products and services that are usable by people with the widest possible range of functional capabilities, which include products and services that are directly accessible (without requiring assistive technologies) and products and services that are interoperable with assistive technologies. (20 U.S.C. §1401(35)(IDEA); 20 U.S.C. §1003(23)(HEOA), both referencing the Assistive Technology Act of 1998, as amended, 29 U.S.C. §3002).

In contrast, the term “Universal Design for Learning” is defined in the HEOA as follows:

The term "universal design for learning" means a scientifically valid framework for guiding educational practice that—

- (A) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and
- (B) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient. (20 U.S.C. § 1003(24)).

While the concept of Universal Design is broader than that of Universal Design for Learning, we are concerned that the paragraph, as written, could have the unintended consequence of further conflating these two terms in practice. Because the manual is, in actuality, addressing the concept of Universal Design for the purposes of assessment, we recommend that the following changes be made to the first paragraph under this section to make the language more precise:

Universal Design describes a CONCEPT OR PHILOSOPHY framework for curriculum design, instructional processes, and THAT, WHEN APPLIED TO assessments, that provides all students with equal opportunities to learn and to demonstrate what they have learned. The purpose of UniversALLY DesignED ASSESSMENTS is to provide access to FOR the greatest number of students during instruction and assessment, and to minimize the need for individualized design or accommodations. Based on neurological research, Universal Design acknowledges DIFFERENCES AMONG INDIVIDUALS that learning is different for each individual, and that for ACCURATE optimal ASSESSMENT learning to occur, a range of methods and materials are needed to implement, support, and measure learning. Universal Design builds flexibility for learners into the curriculum and assessments at the development stage, which enhances teachers' ability to make ENABLES FLEXIBLE adjustments for a broad range of STUDENTS learners during classroom instruction. All learners STUDENTS are intended to benefit from ASSESSMENTS THAT ARE universALLY DESIGNED, including students who are gifted and talented; Els-ENGLISH LANGUAGE LEARNERS, students with physical, cognitive, and/or sensory disabilities; students with emotional or language/learning disabilities; STUDENTS learners with more than one of these characteristics; and students without disabilities. Universal Design for WHEN APPLIED TO ASSESSMENT learning is analogous to Universal Design in architecture, where for example, ramps and curb cuts designed for people in wheelchairs are also considered essential for people without disabilities, such as parents pushing strollers or people moving heavy furniture.

[*Additional suggestion:* Consider moving this final sentence to the top of the paragraph as an introductory analogy from Universal Design in architecture to universal design in assessments.]

Potential for Inequitable Implementation of Accessibility Features and the Personal Needs Profile

We have some serious questions and concerns about the provision of accessibility features and the implementation of the Personal Needs Profile (PNP). The manual refers to the PNP in several places; however, no clarification is provided with respect to how these profiles are to be developed or implemented. For example, will it be a prerequisite for states that want to use the PARCC assessments to require their districts to develop a PNP for all of their students? How would such an outcome be monitored and enforced? Page 5 of the manual states that “PARCC member states have all agreed to implement the principles, policies, and procedures set forth in the Manual.” What does this mean in terms of the implementation of PNPs? Given the lack of availability of technology and resources for some districts, it will be difficult for them to coordinate administration of the regular PARCC assessments, along with administration of an additional assessment for the purpose of developing students’ PNPs, as well as providing additional opportunities for students to practice using the embedded supports, accessibility features, and accommodations. This result could lead to inconsistent and inequitable implementation. We are particularly concerned with differences with respect to infrastructure and lack of adequate bandwidth. The experiences in some states (e.g., MN and IN) that have already implemented digital assessments underscore these challenges. See also <http://www.districtadministration.com/article/common-core-testing-online-without-constant-connectivity> and http://openchannel.nbcnews.com/_news/2013/05/01/18006327-testing-service-apologizes-for-disastrous-disruptions-of-students-online-exams?lite.

Another concern of infrastructure related to the PNP, relates to the lack of availability of large screen displays for students with low vision. Should LEAs administer PARCC assessments utilizing banks of 15” laptop computers, for example, screen magnification would drastically reduce the scope of information presented in the screen’s magnification window, whether in lens or full screen view. This is known as the part/whole problem. The solution during instruction and assessment is for the PNP to take under consideration the student’s need for large screen displays (e.g., 27”) as a requirement for fair and equitable assessment.

Further concerns with equity stem from the fact that the PARCC Manual calls for educators to decide which accessibility features are to be activated for each student, without articulating any parameters within which this process will occur. Page 19 of the manual states that, like embedded supports, accessibility features will be available to all students, “but will be selected and ‘turned on’ by a school-based educator prior to the assessment.” This statement is vague and

invites the possibility of bias and subjectivity to impact decisions about student use of particular features. The process used in one school may differ significantly from that used in another school. It is also important to point out that the test proctors who administer the assessments are not always familiar with the students whose test administrations they are overseeing. These educators may lack the knowledge and skills to determine which accessibility features are appropriate for which individual student.

We also have questions about how the process will work for students with disabilities, as compared to students without disabilities. Page 40 of the manual states: “IEP or 504 team members are responsible for making decisions about which accommodations the student will need, as well as which accessibility features must be selected for [*sic*] a student’s PNP. All students will have a PNP that specifically indicates all of the accessibility features and/or accommodations are [*sic*] required by a student during PARCC assessments.” Thus, while decisions for students with disabilities are to be made by the IEP/504 team, for all other students, such decisions are to be made through a vague process by an undetermined educator. With respect to students with disabilities, although the PNP may be an effective tool to help IEP/504 teams make decisions about appropriate accommodations, more guidance and technical assistance is needed for educators to explain how the PNP is to be used to inform the child’s IEP. Additionally, if students’ IEP/504 teams are to determine which accessibility features these students will use, how do accessibility features differ from other accommodations?

Finally, we agree with the concern of the manual developers that certain accessibility features, if activated, could be detrimental to the ability of some students to demonstrate accurately what they know. We also feel, however, that because of student variability, several of the embedded features, which are also available to all students, could likewise be harmful to some students, if activated. If there is no violation of construct involved, it is unclear why the noted accessibility features are set apart from the other embedded supports.

Construct irrelevance in relation to the over-restrictiveness of the special access accommodations;

We appreciate PARCC’s responsiveness to a number of the issues CAST raised in our prior comments regarding the special access accommodations. Our primary concern, however, continues to be that the process for delineating the special access accommodations is entirely separate from that for determining the constructs associated with particular assessment items. We believe that it is essential for the item developers to be precise in identifying the intended constructs or goals that will correspond to individual items. Without this precision, there is the danger that certain items will measure construct irrelevant information for students who are inappropriately denied these accommodations. As a result, the inferences that are drawn from the assessment scores for these students will be invalid. The over-restrictiveness of the special access

accommodations increases the likelihood that greater numbers of students with disabilities will be denied the opportunity to demonstrate accurately what they have learned with regard to the CCSS on the PARCC assessments and will, therefore, be denied comparable aids, benefits, and services under Section 504 and the ADA.

As we noted in our prior comments, assessments that are built in a digital environment, rather than a paper-and-pencil format, have increased potential to address construct irrelevance and to promote enhanced levels of access for all students, including those with disabilities and English language learners. It is, therefore, critical for PARCC to be explicit about the intended constructs for each item prior to determination of specific accommodations policies. We urge you to take the time to narrow down the constructs and to contextualize accommodations based on those constructs, rather than make broad recommendations that focus on individual student characteristics and are decontextualized from construct.

In addition to our overall concern with construct validity, we also have additional questions about some of the specific language that is being proposed for the special access accommodations:

- **Calculation Device (p. 45).** The language “virtually unable to perform calculations without the use of a calculation device, arithmetic table, or manipulative (i.e., is at the beginning stages of learning how to calculate),” which is defined as being “unable to calculate single-digit numbers (i.e., 0-9) without a calculation device, using the four basic operations of addition, subtraction, multiplication, and division,” is still too restrictive. Many students who struggle with issues of working memory may be able to calculate single digit numbers but have low levels of math fluency. These students would not fall under the current proposed guidelines; however, they may require the use of a calculation device to demonstrate accurately what they know and can do with respect to higher-level math skills. Due to limitations in working memory, some students may use other strategies in making calculations. The need for a calculation device for these students would be particularly important on longer, more involved math problems in order to avoid measuring construct irrelevant factors. We are further concerned that an unintended consequence of this special access accommodation as written may be that in preparation for assessment, teachers of students with math-related disabilities such as dyscalculia will end up spending more instructional time on the drill of basic calculation skills, at the expense of teaching higher level math skills more applicable to college and career goals.
- The manual defines the calculation device accommodation as follows: “The student uses an embedded calculation device (four-function calculator), arithmetic table (including addition/subtraction and multiplication/division charts), manipulatives, or other four-function calculation device (IEP or 504 plan must specify which type) *on the non-calculator session of the Mathematics assessment.*” This statement suggests that certain assessment items will focus on measuring calculation skills, while others will measure higher level math skills. We, again, encourage PARCC to be explicit about its item design procedures in order to provide clarity with respect to the use of accommodations.

- Finally, the fact that the manual refers to this accommodation as an “embedded” feature suggests that it will apply only to assessments built in a digital environment. Page 41 of the manual notes: “The list of accommodations available for students who take the paper-pencil form will be included in an appendix, which will be released in summer 2013.” In the likelihood that there will be an option to take a paper-and-pencil version of the PARCC assessment, further clarification is needed regarding the implementation of this embedded feature in a non-digital environment.
- **Text-to-Speech (Read Aloud) for the ELA/Literacy Assessments, including items, response options, and passages (p. 46).** This accommodation addresses two populations: (1) A student with blindness or a visual impairment who has not learned braille; and (2) A student who has 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.
 - *Student who has blindness or a visual impairment and has not learned braille.* Such a student regardless of level who has not or is not learning braille is presumed under IDEA to be either a print reader or a braille reader. The presence of a concomitant reading disorder unrelated to visual status may serve as an exception. The danger is that PARCC may unintentionally relieve the LEA from its responsibility to teach braille to a student who needs braille. For example, a late blind student with retinitis pigmentosa, a disorder resulting in progressive visual field restriction, may be allowed to graduate from high school having successfully completed the 11th grade assessment using a read aloud accommodation without having the opportunity to learn the necessary skill of reading braille. A visual impairment in and of itself does not preclude the establishment of either braille or print literacy. Not having the opportunity to learn braille when necessary under IDEA would unjustifiably restrict opportunity for career and college readiness.

For students who are blind or visually impaired, it is important for the PNP as well as the student’s IEP/504 plan to take into consideration the student’s use of a read aloud accommodation. Students with visual impairments who rely on either braille or print as their primary learning medium are increasingly participating in core curriculum instructional practices using technologies which simultaneously display refreshable braille or magnified print with synthesized speech. BrailleNotes and ZoomText Reader are examples of widely used technologies in schools today. Both technologies afford speech “on top of” braille or print respectively. Thus, the PNP should be sufficiently sensitive to identify students with visual impairments who are not dually diagnosed with a reading disorder but may benefit from a read aloud accommodation to demonstrate what they know and can do independently during the assessment experience. For example, such students are able to decode and rapidly name words effectively in either print or braille, but due to their disabling sensory limitations, they are unable to reach levels of words read correctly per minute comparable to those of their typically

seeing counterparts. These students are disadvantaged in passage reading; for example, if they are not allowed to access text-to-speech read aloud features to support their reading of text or braille (Jackson, 2012).

- *Student who has 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.* The phrase “severely limits” is again extremely restrictive. Similarly, we are concerned that the phrase “The student is virtually unable to read printed text and is at the beginning stages of learning to decode, not simply reading below grade level” will exclude many students who need this accommodation in order to be able to demonstrate what they know and can do on items measuring reading comprehension. As we noted in our prior comments, recent research has indicated that read aloud accommodations do not interfere with the measurement of reading comprehension ability (Rogers, Thurlow, & Cristian, 2012). It has also been shown that multimodal ways “of interacting with print can be used to increase access to state standards when reading instruction and assessment are appropriately aligned with what each standard is designed to assess” (Johnstone, Thurlow, Thompson, & Clapper, 2008, p. 220).

As with the calculation device accommodation, some students may have progressed beyond the beginning stages of learning to decode but still struggle with reading fluency as a result of issues such as working memory and cognitive overload. This is also true for English Language Learners. Students who struggle with fluency in reading will have particular difficulty on items that are attempting to measure higher-level, complex comprehension skills. This challenge is especially great for older students who are reading significantly below grade level. We are concerned that under the current guidelines such students would be excluded from being able to use the text-to-speech (read aloud) accommodation, resulting in their inability to demonstrate accurately what they have learned in relation to some of the CCSS. It is also to be noted that the definition of this accommodation again assumes a digital environment, stating that the accommodation will be “delivered through text-to-speech technology, and the student uses headphones. If headphones are not used, the student must be tested in a separate setting.” How will this accommodation be implemented in a non-digital environment?

- **Speech-to-Text or Scribe (i.e., Dictating/ Transcription) for the ELA/Literacy Assessments (p. 47).** The phrase “severely limits or prevents the student from expressing in writing, even after varied and repeated attempts to teach the student to do so” is again overly-restrictive. Please refer to CAST’s previous comments regarding the scribe accommodation. The fact that this accommodation is discussed separately from other writing supports is also confusing. Page 21 of the manual notes that basic “writing tools” (e.g., cut and paste, copy, underline, bold, and insert bullets) will be considered an embedded support. We were left to wonder whether additional writing supports for students with disabilities such as graphic organizers would also be available (either as an accessibility feature or a regular (non-special access) accommodation).

Moreover, we were confused as to whether the speech-to-text (scribe) accommodation, defined as follows: “The accommodation allows the student to dictate responses using speech-to-text software, an augmentative/assistive communication device, communication interpretation/ transliteration, or by gesturing, pointing, or eye-gazing,” includes software as well as a human scribe. There are differences among various software devices and human scribes that raise a number of questions - e.g., Will the student be required to provide correct capitalization and punctuation? Further clarification on this issue is needed.

- **Video of a Human Interpreter for the ELA/Literacy Assessments, including items, response options, and passages for a student who is Deaf or Hard of Hearing (p. 48).** We applaud PARCC for adding this accommodation, which was not previously included in the draft policies. We caution, however, that the language (e.g., “severely limits” and “virtually unable to read printed text”), again, has the potential to be overly-restrictive by excluding students who are deaf or hard of hearing who have progressed beyond the most basic levels of decoding. Moreover, we would like to underscore the importance of making sure that students who have access to this accommodation have been given the opportunity to become accustomed to and have had the chance to practice using video with ASL.
- **Word Prediction on the ELA/Literacy Performance-Based Assessment (p. 48).** In addition to using overly-restrictive language (“A physical disability that **severely limits or prevents** the student from writing or keyboarding responses **OR** A disability that **severely limits or prevents** the student from recalling, processing, and expressing written language, even after varied and repeated attempts to teach the student to do so”), this accommodation seems to assume a digital environment for the assessment. It is also unclear whether the intent here is for the software to be external or embedded.

Impact of Assessment on Instruction

We continue to have an overarching concern about the potential effects of assessment on classroom instruction. We see a danger of assessment policy and procedures driving instructional practices, including materials and tools, including accessible instructional materials, or AIM, used for students in the classroom. While it is very clear and we agree that accommodations may interfere with a construct being measured at the item level, we are concerned that schools and or teachers may not allow accommodations for instruction because they may not be allowed on the assessment. We have actually observed this phenomenon—a state was not able to provide computer based writing tests and therefore determined that all writing instruction in classrooms should be using paper and pencil in order to parallel the annual high stakes assessment. We believe this is overcompensation for a testing situation and that this policy does *not* prepare students for college and career.

As stated on page 35 of the manual, “If an instructional accommodation is not allowed on a State Assessment, it is advisable for the student to practice NOT using the non-allowable accommodation on practice tests prior to administering the State assessment. Practicing without using an accommodation during classroom work can also assist in gauging the students progress without the use of the accommodation to determine whether the accommodation is still needed.” This statement could be interpreted to mean that students should not receive accommodations that have been determined appropriate for learning. It also establishes a rationale for an uninformed educator to deny accommodations and supports to a qualified student either during instruction, during assessment, or both. To deny necessary accommodations has the potential, not only to hinder effective and efficient learning, but also to violate the student’s rights under IDEA, Section 504, and the ADA.

In the same page 35 paragraph quoted above, the final sentence suggests that based on the PARCC accommodations that are available, educators should consider those more restrictive accommodations for students in all schooling, instruction, and assessment. We believe that this is beyond the scope of a manual for assessment.

We thank you again for the opportunity to comment on these issues. We look forward to working with you further in this effort toward creating fair and equitable assessments for all learners. We particularly look forward to reviewing the assistive technology (AT) policies in the near future.

Sincerely,

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