

## Accessible Education Western Documentation Guidelines for Learning Disabilities (2023)

Accessible Education Western provides accommodation supports for learning disabilities where impaired performance is identified through formal psychoeducational or neuropsychological testing and where other reasons for impairment have been ruled out. Documentation submitted to Accessible Education Western when requesting accommodations for learning disabilities must include all of the information listed here to determine reasonable academic accommodations. All requests for reasonable accommodations are considered on a case-by-case basis. We use the information submitted to determine what academic accommodations are reasonably supported by the disability. If the documentation submitted does not sufficiently support the need for the requested reasonable accommodation, additional information will be required.

### **Will High School and University Accommodations Be the Same?**

Incoming students will not automatically receive the same accommodations at college or university that they received in high school. Canadian regulations governing academic accommodations at university are different than those for high school. In Ontario, accommodations for “exceptional students” in elementary school and high school are governed by the Education Amendment Act, 1980 (Ontario Ministry of Education). Under this legislation, the primary goal for accommodations and supports is to *improve school performance and ensure academic success*. This Ministry of Education legislation does not apply to college and university students. Academic accommodations for post-secondary students with disabilities in Ontario are governed by the Canadian Human Rights Act and the Ontario Human Rights Code. Under this human rights legislation, colleges and universities in Ontario are permitted to provide accommodations to students with disabilities, with the primary goal of *equalizing the opportunity to participate without compromising academic integrity*. The Human Rights Tribunal of Ontario emphasizes in its rulings that while elementary and high school accommodations are intended to maximize students’ learning, university accommodations are not intended to ensure academic success; instead, post-secondary accommodations are intended only to remove barriers to equal participation in higher education and must ensure that supports do not give students a competitive advantage (Harrison, Holmes, and Pollock, 2021). As secondary and post-secondary accommodations have different goals, your university accommodations may be less extensive than those you received in high school. For example, unlimited time and memory aids for examinations are common in high school but rare in university. See criteria for extra time and memory aid accommodations below.

### **Is a Psychoeducational Assessment Report Needed?**

Yes, the disability documentation submitted to Accessible Education Western should include a formal psycho-educational or neuropsychological assessment report conducted by a psychologist. Without a formal cognitive assessment, it is difficult for Accessible Education Western to evaluate the nature and severity of a disability and the type and degree of accommodation needed. Without a cognitive assessment, Accessible Education Western will be able to provide only limited accommodations. Accessible Education Western reminds evaluators that within the post-secondary sector neither an educational identification nor a DSM diagnosis is sufficient support for granting academic accommodations. The Ontario Human Rights Code requires the higher standard of a *disability* to justify access to post-secondary accommodations. (Ontario Psychological Association, 2022)

### Is an IEP Enough?

The Education Act, 1990 in Ontario allows for the accommodation and support of identified students without a formal disability diagnosis. Individual Educational Plans (IEP), Student Learning Plans (SLP) or similar were developed for secondary education and may not provide the necessary testing, diagnostic information, or information related to determining reasonable accommodations in university. They are not enough for post-secondary support. Western University requires more specific and comprehensive documentation to show proof of a disability. A prior history of accommodation in high school on its own does not warrant the provision of similar accommodations at the post-secondary level. At Western University, only students with verified disabilities are entitled to academic accommodations with Accessible Education.

### Criteria for Assessment Reports

All reports submitted to support accommodation requests must meet the following **six (6)** criteria. If a submitted report does not meet the listed criteria, a student may be required to undergo further diagnostic assessment or extension testing prior to receiving full academic accommodations.

#### Criterion 1: A Qualified Professional Must Conduct the Evaluation

Professionals conducting assessments, rendering diagnoses of specific learning disabilities and making recommendations for appropriate accommodations must be qualified to do so. Accessible Education Western will accept psychoeducational assessments completed by one of the following qualified professionals:

- Clinical Psychologist
- School Psychologist
- Neuropsychologist
- Clinical Psychological Associate

Assessment reports must clearly state the name, title, and professional credentials of the evaluator. Credentials include but are not limited to: licence/registration number, area of specialization, place of employment, and jurisdiction (full address) in which the individual practices. **Documentation from family members will not be accepted due to professional and ethical considerations.**

#### Criterion 2: Testing Must Be Current

Because the provision of all reasonable accommodations and services is based upon assessment of the **current impact** of the student's disabilities on his or her academic performance, it is in a student's best interest to provide recent documentation. For students **younger than 21 years of age**, Accessible Education Western requires that psycho-educational assessments have been **conducted within the past three (3) years using adult-based norms**. For students who are **21 years of age or older**, **assessments must have been completed within the past five (5) years**. Assessments that do not meet these time guidelines are not accurate indicators of a student's current functional limitations. Evaluations that were not completed with adult norms or that were not completed within the above time frames will be considered case-by-case and transitional accommodations may be arranged to provide temporary support while the student obtains updated documentation.

#### Criterion 3: Assessment Must Be Comprehensive

##### A. Diagnostic Interview:

The assessment report should include an interpretative summary of all areas covered during the clinical interview. The evaluation should distinguish a clinically significant impairment from the normal behaviors and

developmental patterns of adolescents and adults. Common components of the diagnostic interview include but are not limited to:

- 1) Description of: the presenting problem(s); relevant developmental and medical history; academic history including review of school report cards when available; relevant family history, psychosocial history; relevant employment history; a discussion of dual diagnosis, co-existing mood, behavioral, neurological, and/or mental health conditions. Comorbid conditions should be discussed and there should be a statement explaining whether the learning disability or the other condition is the primary diagnosis.
- 2) Statements should also be provided that address the following: the intensity and frequency of the symptoms; impact of the impairment on one or more major life activities; the use and impact from medications and therapies. (A positive response to prescribed medications and therapies does not confirm a diagnosis nor does the use of medication support or negate the need for academic adjustments).

**B. Psychometric Testing:**

Tests used to document eligibility **must** be normed, standardized, and otherwise technically sound (i.e. statistically reliable and valid) and should be standardized for use with an adult population. Minimally, the domains to be addressed **must** include the following: 1) *Aptitude/Cognitive Ability*; 2) *Academic Achievement*; and 3) *Effort Testing*. Evaluators may do further extension testing to better understand a student’s challenges and areas of need including but not limited to: *Alternating and Divided Attention*; *Executive Functioning*; *Information Processing*; *Memory*; *Rating Scales for Attention Problems*; *Target Focus and Personality and Psychopathology Tests*.

**Criterion 4: Provide a Clear Diagnostic Statement**

Evaluators are directed to use the definition and diagnostic criteria for Learning Disability or Specific Learning Disorder from either the current version of the Diagnostic and Statistical Manual of Mental Disorders-5-TR (DSM-5-TR) or the recent Ontario Psychological Association Guidelines (OPA, 2022). Reports must explicitly state that the student’s results meet the OPA or DSM-5-TR diagnostic criteria for a learning disability, and if appropriate provide the relevant DSM diagnostic codes.

Nonspecific descriptions using terms such as *"suggests"* or *"is indicative of"* will not be accepted. Diagnoses such as *"attention problems; individual learning styles; learning differences; academic problems; test difficulty or anxiety"* in and of themselves do not constitute an attention disability and will not be accepted. Should the student present with more than one diagnosis, the additional diagnosis(es) should also be reported to assist with assessment and support of associated functional limitations in the academic environment.

**Criterion 5: Actual Test Scores from Standardized Instruments Must be Provided**

Actual test scores must be provided. Standard scores and/or percentiles for subtests and composite indices must be provided for all normed measures. Grade and age equivalents are not acceptable unless standard scores are also included. Test protocol sheets or scores alone are not sufficient; some form of narrative must accompany scores. This information assists with the assessment and planning of appropriate supports and reasonable academic accommodations.

**Criterion 6: Recommendations for Reasonable Accommodations and Rationale**

The rationale for seeking information about a student’s condition is to support Accessible Education Western in establishing disability, understanding how the disability may impact a student, and making informed decisions

about reasonable accommodations that facilitate equal access to Western University's courses, programs, facilities and activities.

The diagnostic report must include specific recommendations for accommodations as well as an explanation of why each accommodation is recommended. Recommendations for reasonable accommodations and services to support functional limitations should be realistic and appropriate for a university setting. The evaluator should also be able to suggest reasonable alternative accommodation(s) that might be considered, and explain in detail how these measures will address the functional limitations set out above. Statements implying that student will “*benefit from support*” in absence of definitive and appreciable evidence of associated functional impairment will not be considered for accommodation.

### **OPA Guidelines for Diagnosis and Assessment of Learning Disabilities**

In addition to the above six criteria, Accessible Education Western follows the recent guidelines for diagnosis and assessment of learning disabilities, written by the Ontario Psychological Association (Updated October 2022).

<https://www.psych.on.ca/getmedia/3458c484-2de8-403c-9005-6f2969bb6cad/OPA-Guidelines-for-Diagnosis-and-Assessment-of-Learning-Disabilities-November-7-2022-correct-pg-41-duplicateJWedits.pdf>

**Western University reserves the right to grant academic accommodations that support the student's equitable and dignified access to the learning environment while protecting and preserving academic standards and integrity.** Psychological assessment reports and inherent recommendations are not applied as prescriptions by post-secondary institutions. Accessible Education Western will review information contained within the report as a part of the full intake assessment. Our assessment includes reviewing all disability documentation and interviewing the student about their lived experience of their disability.

Evaluators are strongly encouraged to review the accompanying guidelines and research associated with the assessment and provision of academic accommodations in higher education settings. This information should be scrutinized in advance of making recommendations for academic accommodations including memory aids/formula sheets and additional time for timed assessments.

### **Additional Time for Tests and Examinations**

If you are requesting additional writing time for tests and examinations due to a cognitive disability (e.g., learning disability, ADHD), a copy of a psychological or psychoeducational assessment report including all test scores must be provided. The report must be recent enough to reflect the student's current functional limitations. Requests for extra time must be reasonable. An accommodation of unlimited time for examinations will not be granted and an accommodation of more than thirty extra minutes per hour is not a standard accommodation for university examinations at Western. The assessment report must provide a **measurable basis** for recommending extra time on tests and examinations. The measurable basis should refer to specific details from the report and will typically include most of the following:

- Details concerning relevant tasks that the student can be expected to perform less quickly as a result of the student's functional limitations (e.g., physically manipulating study materials; bubbling in answers on the answer sheet; reading examination or study materials; knowing and applying information; thinking critically);

- Quantifiable information concerning the student’s performance on such relevant tasks (e.g., how much less quickly the student is able to perform them); and
- References to sources that support the clinician’s recommendation for extra time (e.g., academic articles or texts, medical tests performed)

### Memory Supports

Post-Secondary Institutions in Ontario have sought the expertise of the Regional Assessment Resource Centre (RARC) based at Queen’s University to establish baseline, benchmark criteria used to assess objective measures that evaluate memory needs. They have determined that a psychological report must fulfill the first six of the following criteria in order to support the use of memory aids as a reasonable accommodation. Accessible Education Western uses these six criteria and an additional criterion to assess the need for memory supports for timed assessments.

#### Post-Secondary Sector Criteria to Permit Use of Memory Aids and Formula Sheets

**Criterion 1:** Objective evidence must demonstrate the performance validity of memory test scores.

**Criterion 2:** Low scores on measures of working memory or short-term memory are not sufficient evidence to support the need for a memory aid accommodation.

**Criterion 3:** The assessment must demonstrate that actual learning took place. For any students who have problems with attention, memory tests such as the WRAML and WMS may be primarily assessing *attention* not memory.

**Criterion 4:** When evaluating the meaning of a low delayed memory score, the clinician must use a test that controls for initial amount learned or make these calculations manually.

**Criterion 5:** If delayed memory is impaired (controlling for initial amount learned), the memory test administered must confirm that memory cues significantly improved memory – that the difference between the student’s spontaneous recollection and cued recollection is significantly larger than it is for other students (e.g., normed comparisons).

**Criterion 6:** Clinical reports must be clear in stating that the recommended memory aids may not be appropriate in every course, and that the professor has the final say regarding whether this accommodation is reasonable for their course.

**Accessible Education Western Criterion 7:** Results on standardized achievement tests, e.g. tests in reading, writing and mathematics, must indicate a long-term memory impairment.

If you would like more information about these criteria, please see a recently published article by researchers at Queen’s University:

Harrison, A.G., Holmes, A., & Pollock, B. (2021). Memory aids as a disability-related accommodation? Let’s remember to recommend them appropriately for post-secondary education. *Canadian Journal of School Psychology*, 36(3), 255-272. <https://journals.sagepub.com/doi/10.1177/0829573520979581>