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Inclusive Grading and Progress-Monitoring Practices

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Inclusive Grading and Progress-Monitoring Practices

This T/TAC W&M *Considerations Packet* provides an overview of effective inclusive grading and progress-monitoring practices for educators teaching students with disabilities; specifically, grading practices focusing on alignment with content standards and progress-monitoring techniques both for students working on grade-level and modified standards. Finally, guidelines for reporting grades will be presented based on the relevant federal laws pertaining to students with disabilities.

Philosophies differ regarding assessment and grading practices for students with disabilities. This resource presents some common ground as well as guidelines for general and special educators who are collaborating to coordinate instructional services, progress monitoring, and grade reporting for students with disabilities. The resources used to develop these guidelines support administrators and teachers in aligning the implementation of standards-based individualized educational programs (SBIEP) with progress-monitoring and grading practices that drive instructional design and supports.

Students with disabilities should have access to the same grading conditions as those provided to students without disabilities (Jung & Guskey, 2012). Further, according to O'Connor (2009a), quality grading systems should be accurate, meaningful, consistent, and support the learning process (see Table 1). If these conditions do not exist for students without disabilities, it will be especially difficult to establish these conditions for students with disabilities in inclusive classrooms.

Table 1
Four Quality Conditions for Grading

Four Quality Conditions for Grading	
Condition	Indicators
Grades are accurate.	<ul style="list-style-type: none"> • Behavior and/or participation are separated from academic standards mastery. • Extra credit activities are directly related to standards mastery. • Group scores are not incorporated into individual grades. • Quality assessments are based on clear learning targets with clear purposes. • Calculations are accurate and do not rely on the mean/average of all assignments and assessments. • Alternatives to zeroes are used, especially when grades are calculated using percentages.
Grades are meaningful.	<ul style="list-style-type: none"> • Grades are based on specific skills and content outlined by academic standards. • Grade books are organized by intended learning outcomes, not assessment or assignment type (e.g., “Divides 2-digit numbers by 1-digit numbers with and without remainders” vs. “quiz” or “classwork”). • Grades indicate a student’s specific areas of strength and weakness as they relate to skills and content included in the academic standards.
Grades are consistent.	<ul style="list-style-type: none"> • Teachers follow clearly described performance standards to determine mastery of specific skills and content for all students. • Mastery expectations and grading do not vary significantly between teachers. Teachers share a common understanding of learning expectations and grading.
Grades are supportive of learning.	<ul style="list-style-type: none"> • Grades are summative measures of student learning over time. • The most current evidence of mastery is weighted more heavily than previous measures indicating a lack of proficiency. • Students are involved in assessing their own learning using specific and clear learning criteria.

(Adapted from O’Connor, 2009a)

Traditional grading practices such as assigning a single letter grade or identifying overall student performance as “advanced” or “proficient” do not accurately communicate specific skill proficiency and student growth over time (Reeves, 2011; Wormeli, 2006). Grades that are accurate, meaningful, consistent, and supportive of learning are especially important for students with disabilities.

Standards-Based Grading

Standards-based grading is emerging as an effective practice that aligns grading and reporting with a standards-based curriculum. When engaged in standards-based grading practices, teachers design assignments and activities directly related to learning targets outlined in the curriculum and record students’ specific standards-based mastery as part of their daily practice. This allows teachers to disaggregate student performance data, monitor the effectiveness of instruction, plan future instruction, and provide specific feedback to students and parents (Guskey, 2015).

While standards-based grading is gaining strength as a best practice, schools may develop a variety of grading methods and tools to meet specific goals. A comprehensive reporting system may include components taken from eight major grading methods. Table 2 describes the eight methods as well as considerations for use and specific recommendations.

Table 2
Comparison of Major Grading Methods

Grading Method	Considerations		Recommendations
	Advantages	Challenges	
Letter Grades A, B, C, D, E/F	<ul style="list-style-type: none"> • Most commonly used method • Provides a brief evaluation of performance (Guskey & Bailey, 2001, pp. 68-69) 	<ul style="list-style-type: none"> • Lacks meaningful information about performance with specific skills and content • Confuses norm-referenced comparison language with criterion-referenced standards • Inconsistent percentage point cut-offs between categories vary and can be arbitrary (Guskey & Bailey, 2001, pp. 68-69) 	<ul style="list-style-type: none"> • Not recommended for students with disabilities (O'Connor, 2009a, p. 208) • Recommended for use by separating the aspects (e.g., products, process, progress) of learning into separate grades (Guskey & Bailey, 2001, pp. 69-70) • Incompletes should be given in place of E/F so that students have the opportunity to recover (Guskey & Bailey, 2001, p. 36; Guskey, 2015, p. 93; O'Connor, 2011, p. 95; O'Connor, 2009b, pp. 166-167)
Plus & Minus Letter Grades A+, A, A-, B+, B, B-, C+, C, C-, D+, D, D-, E/F	<ul style="list-style-type: none"> • Communicates differences between students at the high and low end of each grade category • Closely tied to the most common grading method • Provides a limited evaluation of performance (Guskey & Bailey, 2001, pp. 71-74; Guskey, 2015, Chapter 3) 	<ul style="list-style-type: none"> • Lacks meaningful information about performance with specific skills and content • Requires 11 percentage point cut-offs between 12 different categories • Statistically less reliable (Guskey & Bailey, 2001, pp. 71-74; Guskey, 2015, Chapter 3) 	<ul style="list-style-type: none"> • Not recommended for any students, including those with disabilities (Guskey & Bailey, 2001, p. 74; Guskey, 2015, Chapter 3; O'Connor, 2009a, p. 208) • Incompletes should be given in place of E/F so that students have the opportunity to recover (Guskey & Bailey, 2001, p. 36; Guskey, 2015, p. 93; O'Connor, 2011, p. 95; O'Connor, 2009b, pp. 166-167)
Rubrics & Other Categorical Grades Advanced, Proficient,	<ul style="list-style-type: none"> • More descriptive than letter grades when accompanied by specific descriptors • Meant to reduce stigma and increase motivation (Guskey & Bailey, 2001, pp. 75-76; 	<ul style="list-style-type: none"> • Typically translated by audiences into traditional letter grade equivalents (e.g., Advanced = A, Proficient = B) • Lacks specific information about performance with specific skills or content if a single grade is assigned 	<ul style="list-style-type: none"> • Recommended for use at the lower elementary level provided category descriptors are clear and meaningful to students and parents (Guskey & Bailey, 2001) • Recommended method for students

Grading Method	Considerations		Recommendations
	Advantages	Challenges	
Apprentice, Novice √+, √, √- 1, 2, 3, 4	O'Connor, 2009a, p. 205)	<ul style="list-style-type: none"> • Further research about the use of categorical grades to reduce student stigma is needed (Guskey & Bailey, 2001, pp. 75-76) 	with disabilities (O'Connor, 2009a, p. 208)
Percentage Grades 0%-100%	<ul style="list-style-type: none"> • Typically translated into letter grades using a predetermined scale • 2nd most commonly used method • Popular with middle and high school teachers • Provides very explicit performance distinction between students (Guskey & Bailey, 2001, pp. 78-81; Guskey, 2015, Chapter 2) 	<ul style="list-style-type: none"> • Lacks meaningful information about performance with specific skills and content • Inconsistent percentage point cut-offs between categories vary and can be arbitrary • Statistically less reliable (Guskey & Bailey, 2001, pp. 78-81; Guskey, 2015, Chapter 2) 	<ul style="list-style-type: none"> • Not recommended due to a lack of precision, objectivity, and reliability (Guskey & Bailey, 2001, p. 81-82; Guskey, 2015, Chapter 2; O'Connor, 2009a, p. 207) • Not recommended for students with disabilities (O'Connor, 2009a, p. 208)
Standards-Based Grading	<ul style="list-style-type: none"> • Communicates specific and meaningful performance information against established standards • "Can be used for diagnostic and prescriptive purposes." (Guskey & Bailey, 2001, p. 91). • "Facilitates teaching and learning processes better than any other grading method" (Guskey & Bailey, 2001, p. 91). 	<ul style="list-style-type: none"> • Time consuming • Complicated reporting forms can be difficult for teachers to manage and for parents to understand • May lack comparative details about expected grade level performance • May be difficult to implement at the middle and high school levels due to programmatic and curricular variations (Guskey & Bailey, 2001, p. 91) 	<ul style="list-style-type: none"> • Recommended for use at all grade levels provided the establishment of clear learning and a two-part reporting system detailing both performance against standards and progress with grade-level expectations (Guskey & Bailey, 2001, p. 92; O'Connor, 2009a, p. 59; Wormeli, 2006, p. 162) • Recommended for use with students with disabilities (O'Connor, 2009a, p. 208)
Pass/Fail Grading	<ul style="list-style-type: none"> • Simplifies grading • Sets clear cutoff criteria between Pass and Fail categories 	<ul style="list-style-type: none"> • Difficult to determine minimum level of achievement • Does not provide students with specific information about their strengths and 	<ul style="list-style-type: none"> • Not recommended for use in most elementary and secondary school settings (Guskey & Bailey, 2001, p. 96)

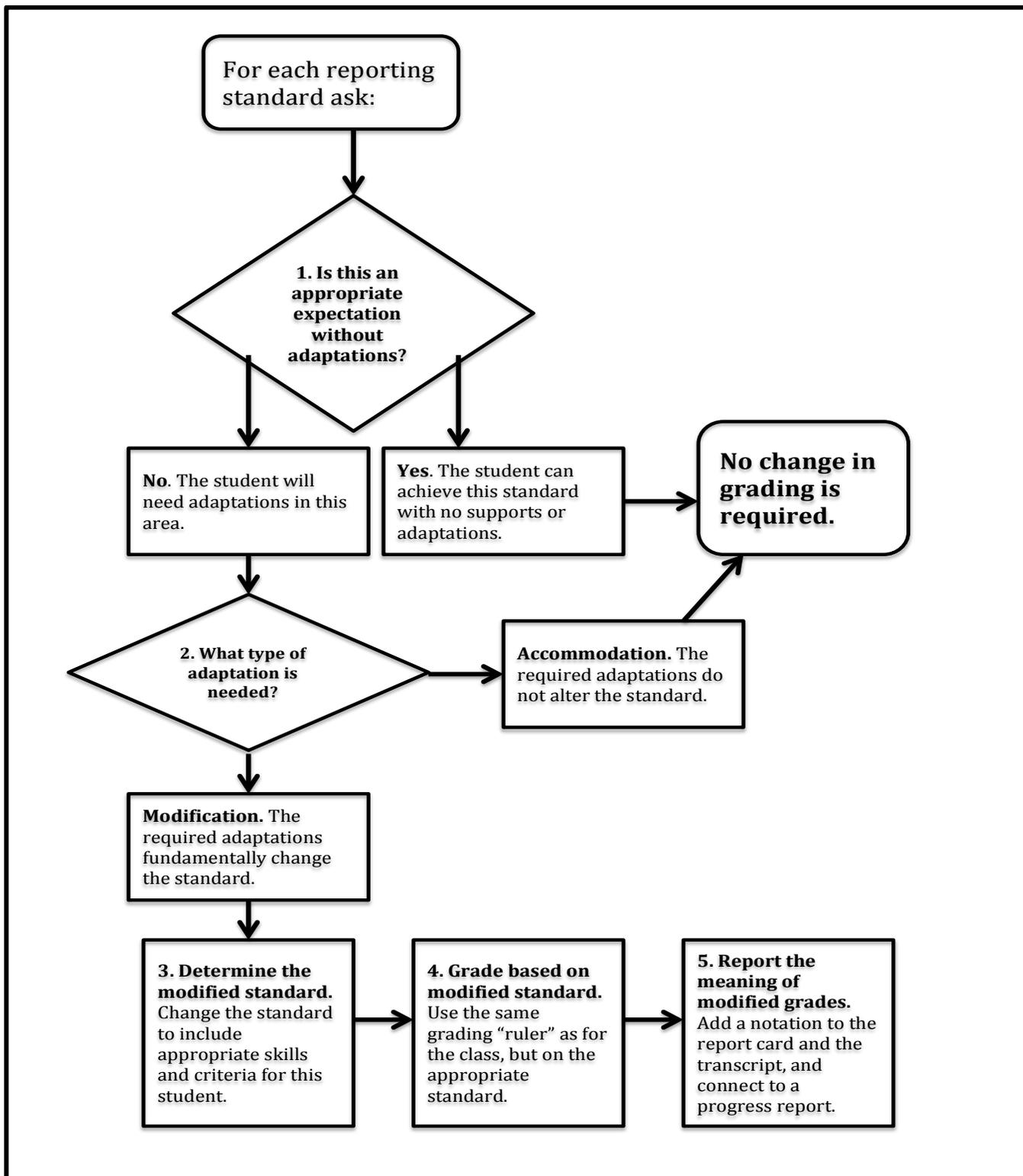
Grading Method	Considerations		Recommendations
	Advantages	Challenges	
	<ul style="list-style-type: none"> • Creates conditions that focus more on learning than on grading • Used for many real-life scenarios (e.g., drivers license, professional certifications, college application procedures) (Guskey & Bailey, 2001, p. 95) 	<ul style="list-style-type: none"> weaknesses with individual components or skills • Reduces student motivation to attain high-level learning if grades do not acknowledge higher levels of performance (Guskey & Bailey, 2001, p. 95; O'Connor, 2009a, p. 206) 	<ul style="list-style-type: none"> • Recommended for use only when content and skills are unpacked and specifically assessed over time to indicate progress toward a broader goal (Guskey & Bailey, 2001, p. 96) <p>When used, a category acknowledging high levels of performance should be added (e.g., "Pass with Honors;" Guskey & Bailey, 2001, p. 96)</p>
Mastery Grading	<ul style="list-style-type: none"> • Simplifies grading for teachers, students, and parents • Only grading method based on learning theory • Improves student learning and attitudes • Aligned with the purpose of instruction • Provides multiple opportunities to succeed • Based on well-defined criteria • Similar to real-life assessment practices found in the professional world (Guskey & Bailey, 2001, pp. 101-102) 	<ul style="list-style-type: none"> • Time consuming and complex demands for teachers • Requires ongoing management of assessments and corrective/enrichment activities • Complex pacing of instruction varies as a course progresses (Guskey & Bailey, 2001, pp. 101-102) 	<ul style="list-style-type: none"> • Recommended for use in all teaching and learning settings • Establishes specific criteria, instructional management, and reporting practices for evidence of growth and mastery (Guskey & Bailey, 2001, pp. 102-103; Wormeli, 2006, Chapter 2) • Recommended for use with students with disabilities (O'Connor, 2009a, p. 208)
Narratives	<ul style="list-style-type: none"> • Specific & personalized • Strong diagnostic & prescriptive value • Adds depth and specific meaning when used in 	<ul style="list-style-type: none"> • Highly subjective and variable in the absence of specific guidelines • Time consuming • Feedback can become standardized if teachers are overwhelmed by the 	<ul style="list-style-type: none"> • Recommended for use at all grade levels when guided by specific learning goals and combined with other grading methods. • Professional development should

Grading Method	Considerations		Recommendations
	Advantages	Challenges	
	combination with other grading methods (Guskey & Bailey, 2001, p. 106)	demands of a large number of narratives • May not communicate performance against specific standards when not combined with other grading methods (Guskey & Bailey, 2001, p. 106-107)	be provided to all teachers to ensure specific and consistent practices (Guskey & Bailey, 2001, p. 108)

Teachers use information from three domains to determine student grades: (a) student products (e.g., reports, projects, written work, assessments); (b) student processes that “enable” academic behavior (e.g., responsibility, effort, work habits); and (c) student progress over time (e.g., learning gain, improvement, growth) (Guskey, 2015, pp. 75-76; Jung & Guskey, 2012, pp.17-18). As such, reporting a single numerical average or letter grade to represent three grading domains does not provide specific and adequate feedback about what students know and can do, or what they need to improve (Guskey, 2015, Chapter 6; Wormeli, 2006, Chapter 8). Assigning separate grades for products, process, and progress provides more meaningful feedback to students and parents and helps teachers make informed instructional decisions.

Jung and Guskey (2010, 2012) have established an inclusive grading model (see Figure 1) that specifies a five-step decision-making protocol for grading students with disabilities in a standards-based curriculum. The model helps general and special educators align their efforts and coordinate grading and reporting responsibilities. The model assumes that grades are measurements against standards, but does not assume that grades are reported using a specific symbol system. Practitioners should recognize how grades communicate success with specific standards regardless of the symbol system being used to report student progress. If the symbol system does not provide specific information about student skill mastery and progress, grade reporting can be supplemented with progress-monitoring reports and narratives.

Figure 1. Inclusive grading model.



(Adapted from Jung & Guskey, 2010, 2012)

Grading Adaptations for Students With Disabilities

Teachers have historically provided informal grading adaptations for students with disabilities. Although maintaining student motivation may be the intent of such informal grading adaptations or adjustments, they do not provide students, parents, and teachers with clear information about a student's skill level and progress (Jung & Guskey, 2012). The inclusive grading model, on the other hand, provides a structured approach for determining the need for grading adaptations and a method for reporting those adaptations in a clear and meaningful way.

Key decision points for determining if a grading adaptation is necessary include:

- Is the student receiving an accommodation that provides access to the grade-level curriculum standard without reducing or significantly altering the standard?
- Does the student require a modified standard expectation that significantly alters the standard?

Jung and Guskey (2012) contend that grading modifications should only be used when the standard expectation has been modified for a student with a disability.

Jung and Guskey (2012) lay out five critical features of an intervention plan for a modified standard that helps to clarify and simplify the progress monitoring of modified expectations (see Table 3). Appendix A contains an excerpt from the Virginia Department of Education's *Students With Disabilities: Guidelines for Special Test Accommodations* (2015) document that details standard test accommodations for students with disabilities. Students with disabilities who, as indicated in their IEP, receive these accommodations on classroom and Virginia Standards of Learning (SOL) assessments are considered by the Virginia Department of Education (VDOE) to have achieved at the same level as students without disabilities. Additional guidelines regarding non-standard accommodations and modified assessment eligibility may be found at: <http://www.doe.virginia.gov/testing/participation/>.

Table 3
Critical Features of a Modified Standard Intervention Plan

<p>1. Measurable Outcomes</p> <ul style="list-style-type: none"> • Using the grade-level criterion, determine an appropriately adapted criterion for the individual student. • Include specific skills and behaviors in the standards-based goal. • Consider short-term objectives or benchmarks. • Specify measurable criteria for success. • Indicate when and how progress will be reported.
<p>2. Clearly Defined Interventions</p> <ul style="list-style-type: none"> • Identify research-based interventions that will be used to help the student achieve the established goal. • Specify when, where, and how often the student will receive the intervention. • Specify who will be responsible for implementing the intervention.
<p>3. Data Collection System</p> <ul style="list-style-type: none"> • Identify when and how often progress data will be collected. • Identify which scoring convention will be used. • Identify how data will be used to make decisions about continuing, altering, or discontinuing the intervention.
<p>4. Visual Representation of Data</p> <ul style="list-style-type: none"> • Record data points on charts or graphs that clearly represent progress toward the goal. • Involve students in graphing and charting their progress. • Share graphs, charts, and supplemental narratives with parents.
<p>5. Web-Based Platform</p> <ul style="list-style-type: none"> • Utilize web-based systems that allow multiple team members or service providers to enter and access data. • Ensure confidentiality is maintained by using secure web-based tools.

(Adapted from Jung & Guskey, 2012)

Legal Considerations

There are certain legal considerations that teachers who report grades for students with disabilities need to be aware of. Questions and Answers on Report Cards and Transcripts for Students with Disabilities Attending Public Elementary and Secondary Schools (Appendix B) addresses questions regarding federal laws that pertain to these grade reporting requirements. For example, parents must receive progress monitoring reports for IEP goals at least as often as report cards and progress reports are provided to parents of students without disabilities (United States Department of Education, Office for Civil Rights, Office of the Assistant Secretary, 2008). The general education report card or progress report should be supplemented

with IEP goal progress monitoring reports (Jung & Guskey, 2012, p. 71). The student's report card should only indicate that the student is receiving special education services or working on modified standards if meaningful skill progress is detailed (United States Department of Education, Office for Civil Rights, Office of the Assistant Secretary, 2008). Modified standards may be indicated on the report card using an asterisk or other symbol (Jung & Guskey, 2012, p. 71; Wormeli, 2006, p.150). When students are not making sufficient progress with their IEP goals or in the general education curriculum, the IEP team should meet to consider adjustments to supports and services. A lack of progress might signal the need for adjusting special education services to ensure that the student is provided meaningful access to the general education curriculum (Jung & Guskey, 2012, p. 101). Methods for measuring IEP goal progress should include the following considerations:

- The frequency and manner of reporting student progress to parents is determined by the student's unique needs.
- Student progress is reported objectively and in a manner that is understood by parents (e.g., jargon-free).
- Specific data regarding the extent to which the student is progressing towards meeting annual goals is reported in measurable terms.
- The information included in reports to parents is sufficient to identify early a student's lack of progress, thereby allowing the IEP team, to reconvene, review and, if appropriate, revise the student's IEP to ensure the student receives the appropriate supports to reach the annual goals.

(Virginia Department of Education, 2011, p. 29)

The IEP Goal Progress-Monitoring Report may be included with the general education progress report and report card and thereby provide parents and students with a complete picture of progress in the grade-level curriculum as well as on individualized goals (Jung & Guskey, 2012, p. 73). An example of an IEP Goal Progress-Monitoring Report may be found in Figure 2. The example includes a standard-based goal that is monitored using categorical progress codes and assessment of skill mastery supplemented by an optional narrative.

Figure 2. Sample IEP progress-monitoring report.

Student Name <u>Jane Smith</u> Date <u>12/10/10</u> Page ___ of ___ Student Number <u>999999</u>				
<p>Progress must be reported at least as often as parents of nondisabled students are informed of their child's progress. Progress on this goal will be reported to the parent or adult student using the following codes. To provide a more detailed summary of a student's performance, a narrative summary with discussion of the evaluation tool is encouraged. Attach comments using progress report comment form.</p>				
<p>Goal: By the end of the current school term, using grade-level reading materials and graphic organizers, Jane will make inferences and locate evidence from text to support generalizations with 80% accuracy on 3 out of 4 collected work samples.</p>				
Anticipated Date of Progress Report*	11/5/2015			
Actual Date of Progress Report	11/11/2015			
Progress Code	*SP			
*SP - The student is making Sufficient Progress to achieve this annual goal within the duration of this IEP.		IP - The student has demonstrated Insufficient Progress to meet this annual goal and may not achieve this goal within the duration of this IEP (explanation needed).		
ES - The student demonstrates Emerging Skill but may not achieve this goal within the duration of this IEP.		NI - The student has Not been provided Instruction on this goal.		
M - The student has Mastered this annual goal.				
Sample of Narrative: PROGRESS REPORT COMMENTS, Continued (This document is optional)				
Student Name: Jane Smith Date 12/10/10 Page ___ of ___ Student Number 999999				
*Goal # 1 Progress Report Code SP: Jane is currently accurately drawing conclusions and summarizing on 75% of her assignments. She is consistently using her strategies and independently requesting the graphic organizers that work for her. Generalizing and making inferences is still weak with only 65% accuracy on classroom assignments and quizzes. We will continue to work on these skills.				

(Adapted from Virginia Department of Education, 2011, p. 28)

Inclusive grading practices and effective progress monitoring are critical issues for educators supporting students with disabilities. General and special educators and administrators must examine grading practices for all students and consider their impact on students with disabilities. As appropriate, educators may move away from traditional grading practices and policies towards grades that are accurate, meaningful, consistent, and supportive of learning, thereby meeting O'Connor's (2009a) four quality conditions of grading. When educators collaborate to provide effective feedback through inclusive grading and progress monitoring, students with disabilities benefit from a more responsive instructional system of support resulting in improved long-term outcomes.

Teachers and administrators may access the following resources to learn more about inclusive grading and progress monitoring practices:

Grading Exceptional and Struggling Learners

By Lee Ann Jung and Thomas R. Guskey

Corwin 2012 ISBN# 978-1-4129-8833-9

On Your Mark: Challenging the Conventions of Grading and Reporting

By Thomas R. Guskey

Solution Tree Press 2015 ISBN# 978-1-935542-77-3

Practical Solutions for Serious Problems in Standards-Based Grading

Edited By Thomas R. Guskey

Corwin Press 2009 ISBN# 978-1-4129-6725-9

A Repair Kit for Grading: 15 Fixes for Broken Grades

By Ken O'Connor

Pearson Education Inc., 2011 ISBN# 978-0-13-248863-1

How to Grade for Learning K-12

By Ken O'Connor

Corwin 2009 ISBN# 978-1-4129-5382-5

The National Center on Student Progress Monitoring

<http://studentprogress.org>

Progress Monitoring Within a Response to Intervention Model

<http://www.rtinetwork.org/learn/research/progress-monitoring-within-a-rti-model>

Wrightslaw Progress Monitoring

<http://www.wrightslaw.com/info/progress.index.htm>

Intervention Central

<http://www.interventioncentral.org>

Center on Response to Intervention at American Institutes for Research

Progress Monitoring

<http://www.rti4success.org/essential-components-rti/progress-monitoring>

The Virginia Tiered System of Support Cohort Training Resources

http://www.doe.virginia.gov/instruction/virginia_tiered_system_supports/index.shtml

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- Virginia Department of Education. (2011). *Guidance document: Standards-based individualized educational program (IEP)*. Retrieved from http://www.doe.virginia.gov/special_ed/iep_instruct_svcs/stds-based_iep/
- Virginia Department of Education. (2015, February). *Students with disabilities: Guidelines for special test accommodations*. Retrieved from <http://www.doe.virginia.gov/testing/participation/>
- Wormeli, R. (2006). *Fair isn't always equal: Assessing and grading in the differentiated classroom*. Portland, ME: Stenhouse Publishers.
- This *Considerations Packet* was developed by Cathy Buyrn, M.Ed. (2015)

Appendix A

Excerpt From
The Virginia Department of Education's
Students With Disabilities: Guidelines for Special Test
Accommodations

Complete resource may be found at:

<http://www.doe.virginia.gov/testing/participation/>

Students With Disabilities: Guidelines for Special Test Accommodations

Test accommodations provide students with disabilities access to state assessments and a means to demonstrate their knowledge and skill on academic content. Test accommodations are changes in the administration of an assessment, which result in an adjustment to how the test is presented or how the student responds to test items. Although test accommodations do not alter the content assessed or the meaning of the resulting scores, they do provide equal access to the assessment for students with disabilities. When used appropriately, test accommodations reduce or even eliminate the effects of a student's disability without reducing learning expectations or providing an unfair advantage.

Test accommodations may not alter, explain, simplify, paraphrase, or eliminate any test item, reading passage, writing prompt, or answer option. Further, test accommodations may not provide verbal or other prompts or suggestions that clue, hint at, or give away the correct response to the student. Any test accommodations based solely on the potential to enhance student performance beyond providing equal access are considered inappropriate and therefore are not permitted.

Test accommodations must be related to the student's disability and based on the individual's needs. Generally, accommodations are the same for classroom instruction, classroom assessments, and state assessments. Although accommodations for instruction and assessments are integrally intertwined, it is critical to note that some accommodations may be appropriate for instructional use, yet inappropriate and not permitted for use on state assessments.

Test accommodations provided to students should adhere to the following principles:

- Accommodations should enable students to participate more fully in instruction and assessments to better demonstrate their knowledge and skills.
- Accommodations must be based upon individual student need and not upon the category of disability, level of instruction, or program setting.
- Accommodations must be justified and documented in the student's IEP or 504 Plan.
- Accommodations should be aligned with and part of daily instruction.
- Accommodations should not be introduced for the first time during the administration of a state assessment.
- Accommodations should foster and facilitate independence for students, not create dependence.
- Only accommodations listed in the *Virginia Standards of Learning Assessments Test Implementation Manuals* or approved in writing through the Virginia Department of Education Special Assessment Accommodation Request procedure may be used on tests that are a part of the Virginia Assessment Program.

A Four-Step Process for the Selection and Use of Test Accommodations¹

Step 1: Expect Students With Disabilities to Achieve Grade-Level Academic Content Standards

Legislation aimed at accountability and the inclusion of all students is designed to ensure equal access to grade-level content standards. Educators and parents should expect students with disabilities to participate in the general curriculum and learn grade-level academic content. Providing effective accommodations during instruction and assessments is critical to achieving this important expectation.

Step 2: Select Accommodations for Instruction

To assure students with disabilities are engaged in grade-level instruction and assessments, every IEP Team or 504 Committee member must be knowledgeable about the Standards of Learning (SOL) and state assessment options available to students with disabilities. Information on state assessment options available to students with disabilities is provided in *Students with Disabilities: Guidelines for Assessment Participation*. This document is available on the Virginia Department of Education's Web site at: <http://doe.virginia.gov/testing/participation/index.shtml>

Effective decision-making about the provision of appropriate accommodations begins with making good instructional choices. In turn, making appropriate instructional choices is facilitated by gathering and reviewing information about the student's disability and present level of performance in relation to the content area. In essence, the process of making decisions about accommodations is one in which members of the IEP Team or 504 Committee attempt to 'level the playing field' so that students with disabilities can participate in the general education curriculum. Care must be taken in all cases to ensure that the accommodation is related to the student's disability and not to other issues that may impact the student's academic performance.

It is critical for students with disabilities to understand their disabilities and learn self-advocacy strategies for success in school and throughout life. The more a student is involved in the accommodation selection process, the more likely the accommodation will be used, especially as the student reaches adolescence and the desire to be more independent increases. Self-advocacy skills become critical as students learn which accommodations are most helpful for them.

Step 3: Select Accommodations for State Assessments

Test accommodations should be considered and discussed separately for each assessment required for the student's grade level or course. They should not be broadly assigned across all assessments. Only accommodations needed by the student, due to the disability, to access the assessment should be selected. Providing accommodations that are not required by the student to access the test may actually interfere with student performance and adversely impact student

¹ Adapted from Christensen, L., Carver, W., VanDeZande, J., & Lazarus, S. (2011). *Accommodations manual: How to select, administer, and evaluate use of accommodations for instruction and assessment of students with disabilities* (3rd ed.). Washington, DC: Council of Chief State School Officers.

achievement as measured by assessments. IEP Teams and 504 Committees must consider the following:

- whether the recommended accommodations are necessary for the purpose of accessing the assessment;
- previous experience with and usefulness of the recommended accommodations; and
- whether the recommended accommodations affect the integrity or security of the assessment. If an accommodation impacts test integrity or security, it is not permitted on state assessments.

When selecting accommodations for state assessments for a student, it is important to determine which accommodations are permitted for the specific assessment. Tables listing test accommodations for the Writing and Non-Writing assessments are provided in Appendix D of the *Virginia Standards of Learning Assessments Test Implementation Manuals*. The use of an accommodation that is not permitted is considered a testing irregularity, which may result in invalidation of the student's score and may require re-testing. Accommodations not listed in the *Virginia Standards of Learning Assessments Test Implementation Manuals* may not be used for SOL testing without prior approval from the Virginia Department of Education through the Special Assessment Accommodation Request process. Additional information regarding this process is available on p. 18 of the complete document found at:

http://www.doe.virginia.gov/testing/participation/guidelines_for_special_test_accommodations.pdf .

Step 4: Administer Accommodations During Instruction and Assessment

Plan how and when the student will learn to use each new accommodation. Ensure that there is ample time for the student to learn to use the accommodation during instruction so that the student is familiar and comfortable with the accommodation when state assessments are administered. Students must be provided with practice in using the selected accommodations before they are used during the state tests.

Planning for Test Day

Once decisions have been made about providing accommodations to meet individual student needs, the logistics of providing the accommodations during SOL assessments must be determined. It is important to involve the appropriate personnel to assist with planning the logistics and providing the test accommodations.

School Test Coordinators are responsible for the overall assessment administration in their buildings and should be involved in planning for the provision of the accommodations. Prior to the day of a test, the School Test Coordinator should ensure Test Examiners and Proctors know what accommodations each student will be using and how to administer them properly. Procedures and conditions for administering the selected accommodations are located in the *Virginia Standards of Learning Assessments Test Implementation Manuals* and must be reviewed to ensure that accommodations are provided appropriately and irregularities and security breaches are avoided.

The *School Division Personnel Test Security Agreement* and Virginia General Assembly legislation specify procedures that all testing staff must follow to assure test security, standardization, and the ethical administration of assessments, as well as consequences for violation of those procedures. Test Examiners, Proctors, and all staff involved in test administration must adhere to these regulations and practices. Providing a student with an accommodation not documented in the student's IEP or 504 Plan, failing to provide a documented accommodation during a state assessment and improper administration of an accommodation are considered testing irregularities, which may result in invalidation of the student's score and may require re-testing. Refer to the *Virginia Standards of Learning Assessments Test Implementation Manuals* for specific information about testing irregularities and the reporting process.

Copies of the *School Division Personnel Test Security Agreement* and the Virginia General Assembly legislation are also located in Appendix A of the *Virginia Standards of Learning Assessments Test Implementation Manuals*.

Test Accommodations Permitted on State Assessments

Categories of test accommodations include time/scheduling, setting, presentation, and response. Time/scheduling accommodations address adjustments in the test schedule and may include accommodations such as breaks or testing during a selected timeframe within the school day. Setting accommodations address adjustments to the physical environment of where the test is normally administered to the student. Presentation accommodations include changes in the format of the test such as large-print or braille or adjustments in how test items are presented to the student. Response accommodations address how the student answers or completes the test items.

A complete list of accommodations is provided on the following page. Additional information about assessment accommodations can be found in the resources listed below which are available on the Virginia Department of Education website:

<http://doe.virginia.gov/testing/participation/index.shtml>

- *Students With Disabilities: Guidelines for Assessment Participation*
- *Guidelines for Administering the Read-Aloud Accommodation for Standards of Learning Assessments*
- *Explanation of Testing Accommodations for Students With Disabilities-Math Aids- Accommodation Code 19*
- *Explanation of Testing Accommodations for Students With Disabilities-Assistive Technology Accommodations*

Conditions and procedures required for the administration of test accommodations are available in Appendix C of the *Virginia Standards of Learning Assessments Test Implementation Manual* on the Virginia Department of Education website:http://doe.virginia.gov/testing/test_administration/index.shtml.

Permitted Test Accommodations by Category

Many test accommodations require special procedures and conditions for administration. Conditions and procedures are provided in Appendix C of the *Virginia Standards of Learning Test Implementation Manuals*. Careful adherence to all conditions and procedures is paramount to ensuring student access as well as test validity and security. Please note that an asterisk (*) is provided next to each test accommodation that requires special procedures and conditions for administration.

<p style="text-align: center;">Timing/Scheduling Accommodations</p> <p><i>Adjust the scheduling of a test:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> time of day <input type="checkbox"/> planned breaks during test* <input type="checkbox"/> multiple test sessions (testing over two or more days)* <input type="checkbox"/> order of test administration 	<p style="text-align: center;">Setting Accommodations</p> <p><i>Adjust the place in which the testing normally occurs:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> individual testing (one-on-one) <input type="checkbox"/> special lighting <input type="checkbox"/> adaptive or special furniture <input type="checkbox"/> test administered in locations with minimal distractions <input type="checkbox"/> hospital/home/non-school setting
<p style="text-align: center;">Presentation Accommodations</p> <p><i>Adjust the presentation of test material and/or test directions:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> visual aids* (e.g., interactive/electronic whiteboard, colored overlay, tinted screen, magnifying glass, large monitor, screen magnifier, graphic organizers, templates, masks or markers to maintain place) <input type="checkbox"/> amplification equipment (e.g., auditory trainer, whisper phone) <input type="checkbox"/> large-print test* <input type="checkbox"/> braille test* <input type="checkbox"/> Plain English version of a mathematics test <input type="checkbox"/> reading directions to students <input type="checkbox"/> written directions to accompany oral directions <input type="checkbox"/> reading of test items aloud* <input type="checkbox"/> audio version of test items* <input type="checkbox"/> interpreting/transliterating directions (e.g., sign language, cued speech)* <input type="checkbox"/> interpreting/transliterating test items (e.g., sign language, cued speech)* 	<p style="text-align: center;">Response Accommodations</p> <p><i>Adjust the manner in which students respond to or answer test items:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> enlarged copy of the answer document* <input type="checkbox"/> communication board or choice cards* <input type="checkbox"/> student marks test booklet, responds verbally, points, uses augmentative device with auditory output, or indicates an answer and Examiner/Proctor marks answer document or selects answer online* <input type="checkbox"/> braille* <input type="checkbox"/> word processor, word processor with speech-to-text, typewriter, or augmentative communication device* <input type="checkbox"/> spelling aids* <input type="checkbox"/> English dictionary* <input type="checkbox"/> dictation using a recording device <input type="checkbox"/> dictation to a scribe* <input type="checkbox"/> read back student response* <input type="checkbox"/> word prediction software* <input type="checkbox"/> calculator or arithmetic tables* <input type="checkbox"/> math aids* <input type="checkbox"/> calculator with additional functions*

Appendix B

**Questions and Answers on
Report Cards and Transcripts
for Students With Disabilities
Attending Public Elementary and Secondary
Schools**

Relevant Federal Laws

October 2008

1. What federal laws can help address questions about what information about disability may appear on report cards and transcripts for students with disabilities attending public elementary and secondary schools?

Section 504 and Title II - Section 504 of the *Rehabilitation Act of 1973* (Section 504) prohibits discrimination on the basis of disability in programs or activities receiving Federal financial assistance. Title II of the *Americans With Disabilities Act of 1990* (Title II) prohibits discrimination on the basis of disability by public entities, including public elementary and secondary school systems, regardless of receipt of Federal financial assistance. The Office for Civil Rights (OCR) in the United States Department of Education (Department) has enforcement responsibilities under both of these laws. As part of their disability nondiscrimination mandates, Section 504 and Title II require local education agencies (LEAs) to provide a free appropriate public education (FAPE) to qualified individuals with disabilities in their jurisdiction. See 34 C.F.R. § 104.33 and 28 C.F.R. § 35.103(a).

Section 504 and Title II do not have specific provisions addressing report cards or transcripts. The regulations implementing Section 504 and Title II make clear that in general, Section 504 and Title II prohibit recipients and public entities from treating persons differently on the basis of disability in the provision of aid, benefits, or services. However, recipients and public entities may provide a different aid, benefit, or service to persons with disabilities where necessary to provide an aid, benefit, or service that is as effective as that provided to others. See 34 C.F.R. § 104.4(b)(1)(i)-(iv) and 28 C.F.R. § 35.130(b)(1)(i)-(iv). Among the aid, benefits, and services provided to students and parents are report cards and transcripts. Section 504 and Title II do not contain specific confidentiality requirements, but do prohibit different treatment on the basis of disability. This generally would prohibit unnecessary disclosures of disability status to third parties.

Other federal laws are also relevant.

IDEA – Through the Office of Special Education and Rehabilitative Services (OSERS), the Department of Education administers the Individuals with Disabilities Education Act (IDEA), which provides funds to states to assist in making a free appropriate public education (FAPE) available to eligible children with disabilities. IDEA requirements apply to state education agencies (SEAs), school districts, and other public agencies that serve IDEA-eligible children.

IDEA does not have specific provisions on student report cards or transcripts, but does require that the individualized education program (IEP) for a child with a disability include a description of how the child's progress toward meeting the annual goals set forth in his or her IEP will be measured and when periodic reports on the child's progress toward meeting the annual goals will be provided (such as through the use of quarterly or other periodic reports, concurrent with the issuance of report cards). 20 U.S.C. § 1414(d)(1)(A)(i)(III); 34 C.F.R. § 300.320(a)(3). These periodic progress reports may be separate from, or included as part of, the regular report cards of students with disabilities with an IEP. In general, the nondiscrimination principles of Section 504 and Title II would apply to report cards with or without such progress reports.

FERPA – The Department’s Family Policy Compliance Office implements and enforces the Family Educational Rights and Privacy Act (FERPA). FERPA protects the privacy interests of parents and students with regard to education records, and generally prohibits a policy or practice of disclosing personally identifiable information

from education records without consent unless it is subject to a specific exception.

Disclosures of personally identifiable student information, including disability status, are subject to the protections of FERPA and IDEA. Generally, these statutes require consent prior to disclosures of personally identifiable information contained in education records unless a specific exception applies. See 34 C.F.R. §§ 99.30 - 99.31 of the FERPA regulations and 34 C.F.R. § 300.622 of the *IDEA* regulations. Both student report cards and student transcripts are considered “education records” under FERPA and IDEA.

While the primary focus of the following questions and answers are the requirements under Section 504 and Title II of the ADA, to the extent that IDEA applies, this law is briefly discussed as well.

Report Cards

2. May a report card for a student with a disability identify special education or other related services or resources being provided for that student or otherwise indicate that the student has a disability? For instance, may the report card refer to an IEP or a plan providing for services under Section 504?

Yes. Report cards are provided to parents to indicate their child’s progress or level of achievement in specific classes, course content, or curriculum. Consistent with this purpose, it would be permissible under Section 504 and Title II for a report card to indicate that a student is receiving special education or related services, as long as the report card informs parents about their child’s progress or level of achievement in specific classes, course content, or curriculum. For instance, a report card for a student with a disability may refer to an IEP or a plan for providing services under Section 504 in order to report on the student’s progress on the specific goals in the IEP or plan developed under Section 504.

However, the mere designation that a student has an IEP or is receiving a related service, without any meaningful explanation of the student’s progress, such as a grade or other evaluative standard established by an LEA and/or SEA, would be inconsistent with IDEA’s periodic reporting requirements, as well as with Section 504 and Title II. Under Section 504 and Title II, in general, the LEA must provide students with disabilities report cards that are as informative and effective as the report cards provided for students without disabilities. See 34 C.F.R. § 104.4(b)(1)(i)-(iv) and 28 C.F.R. § 35.130(b)(1)(i)-(iv). Without more meaningful information, a report card that indicates only special education status provides the student with a disability with a benefit or service that is different from and not as informative and effective as the benefit or service that is provided through the report card for students without disabilities.

3. May a report card for a student with a disability distinguish between special education programs and services and general education curriculum classes through specific notations or the use of asterisks or other symbols?

In general, yes. LEAs frequently distinguish between general education curriculum classes and other types of programs and classes, such as advanced placement, honors, or remedial classes. Making similar distinctions on report cards would be consistent with the general requirements of Section 504 and Title II that individuals

with disabilities may not unnecessarily be treated differently than individuals without disabilities.

See 34 C.F.R. § 104.4(b)(1)(i)-(iv) and 28 C.F.R. § 35.130(b)(1)(i)-(iv). Under Section 504 and Title II, in order to properly reflect the progress of a student with a disability in a modified or alternate education curriculum, an LEA may distinguish between special education programs and services provided under a modified or alternate education curriculum and regular education classes under the general education curriculum on the student's report card. For instance, where a student's IEP calls for a modified tenth grade literature curriculum to be provided through the special education program, it would be appropriate for the report card to indicate that the student's progress was measured based on the modified education curriculum. This distinction also may be achieved by using an asterisk or other symbol meant to reference the modified or alternate education curriculum as long as the statements on the report card, including the asterisks, symbols or other coding, provide an explanation of the student's progress that is as informative and effective as the explanation provided for students without disabilities.

4. May special notations, including asterisks or other symbols, appear on a report card for a student with a disability who received accommodations in general education curriculum classes?

Yes. Accommodations are generally understood to include aids or adjustments that are part of an IEP or plan developed under Section 504 and that enable the student with a disability to learn and demonstrate what the student knows. In general, accommodations do not affect course content or curriculum. Examples may include sign language interpreters in the classroom, the provision of materials in alternate formats, or extra time on tests. Accordingly, to the extent that the use of notations, asterisks, symbols, or other coding on a report card to indicate that a student with a disability received accommodations is part of the information given to parents about their child's progress or level of achievement in specific classes, course content, curriculum, the IEP, or the plan under Section 504, it is permissible under Section 504 and Title II.

5. May a report card for a student with a disability simply refer to another document that more fully describes the student's progress?

Yes. Nothing in Section 504 or Title II requires that LEAs use any particular format or method to provide information to parents about their child's progress or level of achievement in specific classes, course content, curriculum, IEP, or plan under Section 504. As explained above, under Section 504 and Title II, the LEA must provide students with disabilities report cards that are as informative and effective as the report cards provided to students without disabilities. As noted above, there are also IDEA-specific provisions that require periodic reporting.

6. May report card grades for a student with a disability be based on grade level standards?

Yes. Assigning grades (i.e., achievement or "letter" grades) for a child with a disability based on the student's grade level (i.e., year-in-school) standards would not be inconsistent with Section 504 or Title II. Generally, Section 504 and Title II would require that students with and without disabilities in the same regular education

classes in the general education curriculum be graded using the same standards. That is, if an LEA assigns grades to nondisabled students participating in regular education classes using grade level standards to reflect progress in the general education curriculum, then the LEA would also use those standards to assign grades to students with disabilities in those same classes. See 34 C.F.R. § 104.4(b)(1)(i)-(iv) and 28 C.F.R. § 35.130(b)(1)(i)-(iv). Nothing in Section 504 or Title II prohibits SEAs and LEAs from deciding how to establish standards to reflect the progress or level of achievement of students with disabilities who are taught using different course content or a modified or alternate education curriculum. To the extent that a student with a disability is not participating in regular education classes, but is receiving modified course content or is being taught under a modified or alternate curriculum, it would be up to the SEA and/or the LEA to determine the standards to be used to measure the student's progress or level of achievement.

Transcripts

7. May a transcript for a student with a disability indicate that the student has a disability, has been enrolled in a special education program, or has received special education or related services?

No. A student's transcript generally is intended to inform postsecondary institutions or prospective employers of a student's academic credentials and achievements. Information that a student has a disability, or has received special education or related services due to having a disability, does not constitute information about the student's academic credentials and achievements. Under Section 504 and Title II, recipients and public entities may not provide different or separate aid, benefits, or services to individuals with disabilities, or to any class of individuals with disabilities, unless such action is necessary to provide those individuals with aid, benefits, or services that are as effective as those provided to others. See 34 C.F.R. § 104.4(b)(1)(i)-(iv) and 28 C.F.R. § 35.130(b)(1)(i)-(iv). Notations that are used exclusively to identify a student as having a disability or identify education programs for students with disabilities unnecessarily provide these students with different educational benefits or services. Identifying programs as being only for students with disabilities also would be viewed as disclosure of disability status of enrollees and constitutes different treatment on the basis of disability. Therefore, it would be a violation of Section 504 and Title II for a student's transcript to indicate that a student has received special education or a related service or that the student has a disability.

In addition, prohibiting such preadmission and pre-employment disclosures is consistent with the Section 504 regulatory requirements that, in general, postsecondary institutions may not make preadmission inquiries as to whether an applicant for admission has a disability prior to admission, 34 C.F.R. § 104.42(b)(4), nor may employers conduct pre-employment medical examinations or make pre-employment inquiries as to whether an applicant for employment has a disability prior to an offer of employment, 34 C.F.R. § 104.14.

8. May a transcript for a student with a disability indicate, either through specific notations or the use of asterisks or other symbols, that the student took classes with a modified or alternate education curriculum?

In general, yes. While a transcript may not disclose that a student has a disability or has received special

education or related services due to having a disability, a transcript may indicate that a student took classes with a modified or alternate education curriculum. This is consistent with the transcript's purpose of informing postsecondary institutions and prospective employers of a student's academic credentials and achievements. Transcript notations concerning enrollment in different classes, course content, or curriculum by students with disabilities would be consistent with similar transcript designations for classes such as advanced placement, honors, and basic and remedial instruction, which are provided for both students with and without disabilities, and thus would not violate Section 504 or Title II. This distinction may also be achieved by using an asterisk or other symbol meant to reference the modified or alternate education curriculum. These notations, asterisks, or other symbols indicating a modified or alternate education curriculum are permissible when they do not specifically disclose that a student has a disability, are not used for the purpose of identifying programs for students with disabilities, and are consistent with the purpose of a student transcript.

9. May special notations, including asterisks or other symbols, appear on a transcript for a student with a disability who received accommodations in general education curriculum classes?

In general, no. Because the use of accommodations generally does not reflect a student's academic credentials and achievement, but does identify the student as having a disability, it would be a violation of Section 504 and Title II for a student's transcript to indicate that the student received accommodations in any classes. For example, a notation indicating the use of Braille materials is not related to whether that student mastered all the tenth grade objectives for her literature class. The only purpose of such a notation is to identify that student as having a visual impairment. Because accommodations are generally understood to include aids and adjustments to enable a student with a disability to learn and demonstrate knowledge, this notation could identify the student as having a disability and therefore constitute different treatment on the basis of disability.

10. May a transcript for a student with a disability indicate that a student received a certificate of attendance or similar document rather than a regular diploma?

A transcript for a student with a disability may indicate receipt of a certificate of attendance or a similar document, rather than a regular diploma, under certain circumstances. These circumstances are where this does not disclose that a student has received special education or related services, does not otherwise specifically disclose that a student has a disability (for example, because certificates of attendance are available to both students with disabilities and students without disabilities), is not used for the purpose of identifying programs for students with disabilities, and is consistent with the purpose of a student transcript -- to inform postsecondary institutions and prospective employers of a student's academic credentials and achievements.

The Office for Civil Rights in the United States Department of Education issues this guidance to provide state and local education agencies with information concerning disclosure of disability on report cards and transcripts for students with disabilities attending public elementary and secondary schools, under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and its implementing regulation (34 C.F.R. Part 104) and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131 *et seq.*) and its implementing regulation (28 C.F.R. Part 35). As appropriate, this document also discusses two other relevant federal laws, the Individuals with Disabilities Education Act of 2004 (20 U.S.C. § 1400 *et seq.*) and its implementing regulation (34 C.F.R. Part 300) and the Family Educational Rights and Privacy Act (20 U.S.C. §1232g) and its implementing regulation (34 C.F.R. Part 99).

This guidance represents the Department's current thinking on this topic. It does not create or confer any rights for or on any person. This guidance does not impose any requirements beyond those required under applicable law and regulations.

If you are interested in commenting on this guidance, please email us your comment at OCR@ed.gov or write to us at the following address: U.S. Department of Education; Office for Civil Rights; 400 Maryland Avenue, SW; Washington, DC 20202.