



Measuring the Power of Learning.®

***Guidelines for Documentation of
Learning Disabilities
in Adolescents and Adults***

Fourth Edition 2017

Office of Disability Policy
Educational Testing Service
Princeton, NJ 08541

Preface

Educational Testing Service (ETS) recognizes the importance of periodic review of policy statements to ensure they reflect current practice, developments in the field and recent guidance from the Department of Justice. This fourth edition (2017) of *ETS Guidelines for Documentation of Learning Disabilities in Adolescents and Adults* incorporates previous revisions and introduces other changes based upon many years of experience with test takers with learning disabilities.

Introduction

ETS is committed to providing reasonable testing accommodations for candidates with documented disabilities as recognized under the ADA Amendments Act of 2008 (ADA AA). We treat requests for accommodations on a case-by-case basis according to established policies and procedures, which ensure that people with disabilities have equal access to our tests. This document contains information to guide test takers with learning disabilities in requesting accommodations. It also includes information to guide evaluators in documenting learning disabilities and in providing their rationales for testing accommodations.

Please note that there are differences between the laws that govern accommodations in K–12 education and those that apply to postsecondary education. ETS adheres to the ADA AA, the law appropriate to postsecondary education, emphasizing equal access to educational opportunities, while K–12 education places the emphasis on student success. Because of these differences, a person may not be eligible for the same accommodations that were received in the past in a different educational setting. Based upon the information provided, ETS may approve some, all or none of the accommodations requested. Of the many thousands of applicants who request accommodations every year, most ultimately receive accommodations.

You may refer to our ["For Test Takers"](#) page for helpful information on requesting accommodations, registering for a test and scheduling a test date. You can also use the "For Test Takers" page for a list of common accommodations, information on where to find bulletins for the test(s) you plan to take, how to submit documentation to ETS in support of requested accommodations, and how to register, pay for and schedule the test(s).

To provide more information for your evaluators, please direct them to our ["For Evaluators"](#) page.

Confidentiality

ETS adheres to its policies regarding its responsibility to maintain confidentiality of your documentation and will not release any part of the documentation without test taker informed consent or under compulsion of legal process.

Definition of Learning Disabilities

Learning disabilities is a general term that refers to a heterogeneous group of disorders characterized by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning or mathematical abilities. These disorders are intrinsic to the individual, presumed to be due to central nervous system dysfunction, and may occur across the life span. Problems in self-regulatory behaviors, social perception and social interaction may exist with learning disabilities, but do not by themselves constitute a learning disability. Although learning disabilities may occur concomitantly with other disabilities (e.g., sensory impairment, intellectual disabilities, emotional disturbance) or with extrinsic influences (e.g., cultural or linguistic differences, insufficient or inappropriate instruction), they are not the result of those conditions or influences. *Adopted from the National Joint Committee on Learning Disabilities (2016).*

Documentation Details

Who should conduct an evaluation?

A qualified professional, with demonstrated training and experience in the assessment of learning disabilities in adolescents and adults, should conduct the evaluation. A licensed clinical or school psychologist, neuropsychologist or other comparably trained expert is generally considered qualified to evaluate and diagnose learning disabilities.

The name, title and professional credentials of the evaluator should be clearly stated in the documentation. This information should include licensure and/or certification, as well as the areas of specialization, employment, and the state or province in which the individual practices. All reports should be on letterhead, typed in English, dated, signed and otherwise legible.

How recent should documentation be?

The provision of reasonable accommodations and services is based upon clear evidence of the current impact of the disability on academic and test-taking performance. In most cases, this means that a diagnostic evaluation has been completed within the past five years. Ideally, this evaluation would have been completed when the test taker was at least 16 years of age.

Can the ETS Certification of Eligibility: Accommodations History [form](#) be used?

The Certification of Eligibility: Accommodations History form (COE) may be used as an alternative to receive a decision from ETS. When using the COE, test takers can expect a decision in approximately 2–3 weeks rather than the 4–6 weeks required for a full review of documentation. If the COE is used, documentation should **not** be submitted, as it will cause delays in receiving a response.

Test takers can use a COE if:

- they are requesting 50 percent extended time and/or breaks only and are currently using or have used the accommodations within the past two years

- the documentation on file at the test taker’s academic institution or place of employment meets **all** criteria outlined in this document, including:
 - test taker has a history of LD and/or other disabilities;
 - age-appropriate measures were used in the evaluation;
 - the cognitive, processing and achievement testing was conducted within the last 5 years;
 - a diagnosis is provided and alternate diagnoses were ruled out;
 - an integrated summary is included;
 - accommodation recommendations are supported by rationales and linked to the test taker’s functional limitations; and
 - the documentation is printed or typed on letterhead, in English, signed and dated by the evaluator.

If the COE is not used, what documentation should be submitted?

The documentation must validate the need for accommodations based upon the test taker's current level of functioning and how that level of functioning may impact test taking. The documentation should include:

- a summary of a clinical interview and behavioral observations including:
 - a history of presenting problems associated with the disability as well as information on the test taker's medical, developmental, educational, vocational and family history. The history should also include a discussion of pre-existing or co-existing disorders including behavioral, medical, neurological and/or personality disorders along with any history of medication use that may affect the individual’s learning or test-taking performance. The summary should also include the date of diagnosis, duration and severity of the disorder. A combination of applicant self-report, interviews with others, review of transcripts and prior standardized test scores is recommended.
 - qualitative description of the applicant’s test behaviors and strategies used in the testing process. This description may include signs of anxiety, fatigue or motivational issues.

- assessment of the major domains of cognitive ability, information processing and academic achievement (see [Appendix B Tests for Assessing Adolescents and Adults with Learning Disabilities](#))
- objective evidence of a *substantial limitation to learning* reflected in the neuro-psychological or psycho-educational evaluation. Assessment must consist of a comprehensive, individualized, standardized, and norm-appropriate battery that reflects the functional limitations associated with the requested accommodations. The choice of the psychometric assessment battery should be guided by the overall objective(s) of the evaluation, the individual needs of the test taker, sound clinical judgment and prevailing professional practices. Ideally, the most recent edition of any normed measure should be used; if not, an explanation must be provided.
- test scores from standardized instruments:
 - Standard scores are preferred, but at the very least, percentile ranks must be provided for all normed measures. The data must logically reflect a substantial limitation to learning for which the candidate is requesting the accommodation. The particular profile of the candidate's strengths and weaknesses must be shown to relate to functional limitations that necessitate accommodations.
 - The tests used must be reliable, valid and standardized for use with an adolescent/adult population and, whenever possible, the most recently normed version of the test should be used. The test findings must document both the nature and the severity of the learning disability. Informal inventories, surveys and direct observation by a qualified professional may be used in tandem with formal tests to further develop a clinical hypothesis.
- a clear diagnosis and statement of disability:
 - A clear diagnostic statement in accordance with the most recent edition of the Diagnostic Statistical Manual (DSM) or International Classification of Disease (ICD), including a discussion of functional limitations due to the learning disability, is required. The evaluation must document both the nature and severity of the learning disability. The evaluator must describe the impact the learning disability has on major life activities, including the significance of this impact on the individual's learning and test taking in particular.

- Nonspecific diagnoses, such as individual "learning styles," "learning differences," "academic problems" or "slow reader," do not constitute a learning disability. The evaluator is encouraged to use direct and specific language in the diagnosis and documentation of a learning disability.
- *Rule out.* It is important to rule out alternative explanations for problems in learning, such as emotional, attentional, medical or motivational problems, in addition to medication effects that may be interfering with learning but do not constitute a learning disability. If the data do not support the presence of a learning disability, the evaluator must state that conclusion in the report.
- a rationale for each accommodation recommended by the evaluator:
 - The documentation must include specific recommendations for accommodation(s) as well as a detailed explanation of why each accommodation is recommended. The data must reflect a substantial limitation to learning for which the applicant is requesting the accommodation. The evaluator should support recommendations with a rationale based upon specific test results and/or clinical observations.
- an interpretive summary:
 - A well-written summary based on a comprehensive evaluation is a necessary component of a current evaluation or of an evaluation update. Assessment instruments and the data they generate provide important information. The evaluator should integrate this assessment information with the test taker's history, the current reason for referral and observations of the applicant during the evaluation, to arrive at a diagnostic conclusion. It is essential, therefore, that professional judgment be used in the diagnosis and in the interpretive summary. The summary must include evidence of:
 - how patterns in cognitive ability, achievement, and information processing are used to determine the presence of a learning disability;
 - the substantial limitation to learning presented by the learning disability and the degree to which it affects the individual in the testing context for which accommodations are being requested; and
 - why specific accommodations are needed on the test and how the effects of the specific disability are mediated by the accommodations.

What if the documentation is more than five years old?

If documentation is older than the 5-year general guideline, a complete reevaluation or a *documentation update* may be submitted.

A *documentation update* is a brief report by a qualified professional. It should include a summary of the disability history and the original documentation findings, as well as a clinical update that reaffirms the learning disability diagnosis and introduces any new factors related to the functional limitations of the disability. It is essential that the professional address the current functional impact on the test taker and, more specifically, its potential impact in the test-taking situation.

The update should also include a *current* rationale regarding the need for any requested accommodations. While documentation from a professional is required, any information from the applicant that helps to clarify and/or illustrate the current need for the requested accommodation(s) is also welcome. This might include a statement from the test taker that explains how the disability affects learning, test-taking and performance. The evaluation instruments selected for the update may require only those tests and scales that illustrate the nature of the test taker's disability and its impact on learning and test taking.

The following are general recommendations about information to provide in a documentation update:

- a restatement of the current diagnosis accompanied by supporting documentation, if available, including date(s) for all prior diagnoses and data that were used to establish the diagnosis;
- verification of continuing weaknesses in those areas identified in prior evaluation(s);
- a statement from a professional who has worked with the test taker about current functional limitations due to her/his disability;
- observational data from test taker's clinician, a disability service provider and/or a work supervisor regarding relevant behaviors such as ease of work production, test taking and/or the general impact of the learning disability;
- a history of the accommodations the test taker has received and the consistency and circumstances of their use (e.g., type of test for which accommodations have been most helpful), or an explanation of why accommodations have not been used previously but are needed now; and
- a discussion of the appropriateness of the requested accommodations for the specific ETS test which the test taker is applying to take.

When is it more appropriate to have a documentation update?

There is no exact combination of factors that ultimately determines whether a comprehensive reevaluation or documentation update would be the most appropriate documentation to submit. The following factors should be considered by test takers and the professionals with whom they work to make this determination:

- the test taker's age at the time of first diagnosis and the consistency of the test taker's functional limitations over time;
- the number of previous evaluations that include both cognitive and academic assessment measures;

- the availability of documentation from educational institutions, workplaces or testing agencies confirming the prior use of accommodations;
- the presence of co-occurring or co-morbid disorders that interact or compound the stated learning disability; and
- the clinician’s ability to address the above listed essentials of a documentation update effectively, without additional psycho-educational or performance-based evaluation (i.e., why such an evaluation or “testing” would be redundant or otherwise burdensome).

Conclusion

ETS is committed to providing equal access to our assessments for all test takers. If you have been diagnosed with a learning disability and believe you need accommodations for equal access during the standardized testing process, ETS will individually evaluate the information that you provide and will work with you to identify any additional documents we require to make a timely determination of your eligibility for accommodations. We welcome the opportunity to engage in discussions with test takers who have disabilities to determine reasonable accommodations on a case-by-case basis.