The Documentation Disconnect for Students With Learning Disabilities: Improving Access to Postsecondary Disability Services

A Report from the National Joint Committee on Learning Disabilities*

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This report by the National Joint Committee on Learning Disabilities (NJCLD) outlines important concerns about documentation issues related to students with disabilities as they transition from high school to postsecondary settings. These issues center on the “disconnect” between the nature and extent of disability documentation generated during a student’s public school career and the documentation required to access services at the postsecondary education level. There is no easy answer to this problem given the legal, practical, and philosophical differences between these two educational settings, and it is clear that new ways of thinking about the documentation for accessing services in postsecondary education for students with learning disabilities (LD) need to occur.

One of the main tenets of this paper is that all persons involved in the successful and equitable transition of individuals with LD to postsecondary institutions need to understand each other’s constraints and perspectives. This understanding will be greatly enhanced when there is a shared goal of helping all students receive services to which they are entitled and when educators from each level commit to communicating with each other. The purpose of this report is to outline the issues affecting documentation for postsecondary disability services and to suggest ways to bridge the gap between secondary and postsecondary settings.

Need for Appropriate Documentation

Many variables affect the successful transition of students with LD into postsecondary education. One major component is having appropriate documentation of their disability. Currently, students submit documentation to the postsecondary school they are attending or want to attend, and the service provider at the postsecondary institution determines the students’ eligibility for services after matriculation. The purposes and needs for documentation in secondary education differ from those in postsecondary education. As they transition, students find themselves moving from documentation for eligibility, instruction, and intervention needed at the secondary level to documentation for eligibility, access, and accommodations needed at the postsecondary level. Documentation developed for the purposes of the secondary school often does not meet...
the needs or requirements of the postsecondary institution. This gap in the different purposes and types of documentation continues to widen as educational reforms under the No Child Left Behind Act (NCLB) and the Individuals with Disabilities Education Improvement Act (IDEA 2004) require more instructional and intervention information regarding students’ educational outcomes.

The NJCLD recognizes the disconnect that occurs for students with LD as they attempt to use documentation from secondary education for postsecondary educational settings. In order to gain a clear understanding of these documentation differences and the effects they have on the transition process, the NJCLD took a series of steps to open the lines of communication between the various stakeholders and to identify incongruencies within the transition process, as they relate to documentation.

In the fall of 2002, the NJCLD hosted an LD Documentation meeting. The purpose of this national forum was to assemble key stakeholders to identify the issues surrounding documentation and transition for students with LD. Participants in the forum consisted of at least one representative from each NJCLD member organization as well as invited guests who represented views from the legal field, secondary educators, postsecondary service providers, parents, equal opportunity officers, and educational diagnosticians.

**Issues Affecting Documentation**

The 2002 discussion forum identified three major issues affecting the documentation and transition process for students with LD. The following is a brief discussion of those issues:

**ISSUE 1:** There is a lack of consistency in the documentation requirements for students as they transition from secondary to postsecondary programs. Current assessment practices in secondary education do not always create documentation that is consistent with the requirements of postsecondary institutions. Additionally, at the postsecondary level, there is a lack of uniformity in determining whether an individual is eligible as a person with a disability and in identifying needed supplemental services and accommodations for access. There are no consistent or agreed upon principles related to interpretation of data and information to determine student eligibility, access to services, and appropriate accommodations.

**ISSUE 2:** There is a disconnect between the laws that govern secondary and postsecondary access to programs and services for individuals with LD. These laws are different in their purposes and structures; therefore, the requirements and mandates also differ.

**ISSUE 3:** Various driving forces complicate matters. Secondary and postsecondary institutions differ in their programs and expectations; testing
agencies impose documentation requirements; and educational decisions are made by postsecondary personnel with varying qualifications.

To gain additional information and to encourage national dialogue on the topic, the NJCLD held focus groups at the Association on Higher Education and Disability (AHEAD), Council for Learning Disabilities (CLD), International Dyslexia Association (IDA), and Learning Disabilities Association (LDA). In addition, a second LD Documentation discussion forum was held at the NJCLD’s spring 2005 meeting, and a review and analysis of current postsecondary guidelines for students with LD was conducted and analyzed (Gormley, Hughes, Block, & Lendman, 2005).

**Where Are the Disconnects?**

Careful transition planning for the student with LD advancing from high school to college is crucial for a positive postsecondary experience. For many students, receiving disability support services in the postsecondary setting will be important to their success. Students must present comprehensive documentation to validate LD and their need for accommodations to colleges and universities in order to receive disability support services. High schools, however, are not required by law to provide the type and form of documentation that many postsecondary institutions specify; hence, a disconnect between the two settings often occurs.

To understand the reasons for this disconnect, one must examine the different laws that govern services in K–12 public schools versus postsecondary schools. K–12 public schools must adhere to both IDEA and to Section 504 of the Rehabilitation Act of 1973, while only Section 504 and the Americans with Disabilities Act (ADA) affect postsecondary institutions. The intent of these laws varies. Specifically, IDEA 2004 provides a free and appropriate public education (FAPE) to qualifying students and focuses on educational outcomes and success, while Section 504 and ADA are civil rights mandates that ensure opportunity, equal access, and prevent discrimination (Gormley et al., 2005). A major impediment to generating documentation is that neither secondary nor postsecondary education is mandated by law to provide updated standardized assessments, so there is no funding for these activities.

Students who were eligible for services under IDEA 2004 are not automatically eligible for services under Section 504 and ADA in college and university settings. In most cases, postsecondary disability service providers interpret Section 504 and ADA guidelines to mean that a specific diagnosis with a clearly established functional limitation in a major life activity is required. In K–12 education, however, States use a variety of terms (e.g., perceptual/communication or neurological impairment) that may not be readily familiar to postsecondary institutions. Furthermore, once eligibility for special education is established, States or school districts may not require a label, or may allow the option of not specifying a disability category. To document the need for accommodations, postsecondary service providers require a clear rationale and history of the use of accommodations along with data from psychoeducational evaluations to make their decisions. In contrast to the types of data sources typical in secondary reevaluations,
postsecondary institutions, in most cases, require evaluation data to be current, be administered by a qualified examiner with experience evaluating adults, and include standardized, adult-normed measures of aptitude, achievement, and information processing (Gormley et al., 2005).

As per IDEA 2004 regulations addressing reevaluations, the Individualized Education Program (IEP) Team must review existing data and identify what additional data, if any, are needed to determine whether the student continues to have a disability and is in need of special education and related services. The IEP team also must decide whether any additions or modifications to special education and related services are needed to meet the IEP goals and for the student to participate, as appropriate, in the general education curriculum.

IDEA 2004 mandates that an IEP include a statement of the student’s present levels of academic and functional performance, and also requires the monitoring of student progress. IEP teams assess student progress and functional performance through multiple methods. These methods may include state accountability testing as required under NCLB, curriculum-based measures, summative classroom exams, and teacher observations. In some instances, however, a student’s 3-year reevaluation may not consist of cognitive measures and standardized achievement tests, but rather may emphasize the student’s progress on IEP goals, statewide accountability tests results, and whether the interventions and accommodations provided have been beneficial to the student.

Specific expectations and requirements for evaluations vary greatly between the two settings. IDEA 2004 stipulates that a reevaluation shall occur at least every 3 years, unless the parents and school agree that it is unnecessary. The purpose of a reevaluation is to confirm continued eligibility, gauge the effectiveness of current services, and determine future programming needs. It also is important to note that IDEA 2004 provided the clarification that a student does not need to be reevaluated when the termination of a student’s eligibility is due to graduation from secondary school with a regular diploma or due to exceeding the age of eligibility for FAPE. Similarly, Section 504 and the ADA do not require high schools or postsecondary schools to conduct or pay for evaluations to document a disability (U.S. Department of Education, 2002). However, some districts do conduct evaluations to address the documentation requirements of colleges and universities. This is understandable because K–12 educators are invested in facilitating their students’ admission into, and success in, postsecondary education.

The NJCLD is concerned about practices related to transition to postsecondary settings. First, given their large case loads, if specialized school personnel expand their evaluation role to meet the additional documentation needs of postsecondary education, it would come at the expense of their involvement with other valuable roles and functions. These include prevention programs, academic interventions, consultation, and mental health services. It would be rare for a school district to have the resources to hire additional school psychologists and other evaluators to provide the documentation required by colleges and universities. Second, school districts that serve large numbers of economically disadvantaged students—whose families would regard the expense of a
private postsecondary documentation evaluation as a hardship—are often the ones with staffing shortages and less ability to provide nonmandated evaluations at public expense. Inconsistency from one school system to another, especially one that places an additional burden on families with lesser means, poses an equity, or social justice, issue. This could result in denial of disability services in postsecondary settings for those students unable to pay privately for the required evaluations.

Ways to Bridge the Gaps

The following information may be useful in bridging the gap between the documentation that secondary service professionals provide and the documentation that postsecondary service providers accept to support decisions about eligibility and accommodations. First, information on disability from AHEAD is presented to provide guidance on what constitutes comprehensive documentation at the postsecondary level. This “best practices” information can guide secondary personnel as they assist students in gathering the documentation necessary to access services at the postsecondary level. Second, the Summary of Performance (SOP) provision from IDEA 2004 is discussed as a vehicle for secondary personnel to summarize the student’s academic achievement and functional performance and provide recommendations to assist college and university disability support personnel in evaluating the student’s eligibility for services. Third, the results of a survey (Gormley et al., 2005) provide data that can guide communication and collaboration between secondary and postsecondary service professionals to facilitate successful student transition. Finally, specific recommendations are provided for secondary and postsecondary personnel for improving the transition process to higher education settings for students with LD.

Postsecondary Documentation Best Practices

In an attempt to provide guidance for postsecondary disability service providers, AHEAD has created a best practices model for institutions to use in making decisions about the adequacy of documentation and in creating guidelines that fit their specific needs. The document, AHEAD Best Practices: Disability Documentation in Higher Education (2004) includes sections on The Use and Purposes of Documentation; Foundational Principles for the Review of Documentation and the Determination of Accommodations; and Seven Essential Elements of Quality Disability Documentation. (Download the full text of all three sections from www.ahead.org.)

The following is a summary of the Seven Essential Elements section:

1. The best quality documentation is provided by a licensed or otherwise properly credentialed professional with appropriate and comprehensive training and relevant experience.

2. Quality documentation contains a clear diagnostic statement that describes how the diagnosis was made, provides information on the functional impact of the disability, and details the prognosis.
3. Comprehensive documentation may include both formal and informal methods of evaluation. Formal, standardized assessment may include diagnostic criteria, methods and procedures used, tests and dates of administration, and a clinical narrative. Informal methods should explain their role in the diagnostic process (i.e., history of accommodations, educational situations, and extent of the disability’s impact).

4. Information on how learning is currently affected is important in establishing LD and the need for specific accommodations. Currency of documentation, while important, should be a flexible construct that varies depending on the permanence or variability of the LD, and on the demands of the educational setting.

5. Documentation should provide information on any expected or cyclical changes in the functional impact of the disability over time and context and any known or suspected environmental impacts.

6. Comprehensive documentation includes a description of both current and past auxiliary aids, assistive devices, support services, and accommodations, including their effectiveness in the educational setting.

7. Recommendations from professionals with a history of working with the student are often useful for determining effective accommodations.

Having a familiarity with the documentation content important to postsecondary service providers may help secondary professionals gather documentation and performance information about students with LD who are about to transition to postsecondary settings. The closer the alignment between the information provided by the secondary school and these recommendations for postsecondary documentation, the more likely the student will be able to access services without extensive and expensive reevaluation.

**Summary of Performance**

Schools are no longer required to conduct a reevaluation before a student leaves secondary school either due to graduation or reaching age of noneligibility. However, IDEA 2004 *does* require a summary of performance (SOP) to support student transition:

“...a local educational agency shall provide the child with a summary of the child’s academic achievement and functional performance, which shall include recommendations on how to assist the child in meeting the child’s postsecondary goals.” (§300.305(e)(3))

The intention of the SOP is to summarize existing information (in lieu of a full reevaluation) in a way that may provide professionals at the postsecondary level the information they need to make decisions related to eligibility and reasonable accommodations.
In 2005, the National Transition Documentation Summit, a group of secondary and postsecondary representatives, rehabilitation specialists, consumer advocates, and parents, produced a generic SOP template (see www.cec.sped.org) that could be used to summarize existing documentation regarding academic achievement, functional performance, and recommendations in a way that would help postsecondary personnel consider student eligibility and need for accommodations (Madaus & Shaw, 2006; Shaw, 2006). The sections of this SOP template are as follows:

**Part 1: Background information.** This section includes the student’s disability and the date of the most recent IEP or 504 plan, as well as copies of the most recent assessment reports that diagnose and clearly identify the student’s disability or functional limitations that will assist in postsecondary planning.

**Part 2: Student’s postsecondary goals.** The student’s goals should indicate the postschool environment(s) the student intends to transition to upon the completion of high school.

**Part 3: Summary of performance.** This section includes the academic, cognitive, and functional levels of performance and the accommodations, modifications, and assistive technologies that were essential in high school to assist the student in achieving progress, and why they were needed.

**Part 4: Recommendations to assist the student in meeting postsecondary goals.** This section includes suggestions for accommodations, adaptive devices and services, compensatory strategies, and support services to enhance access to post-high school environments.

**Part 5: Student input.** This section lists the student’s perspective on how the disability affects schoolwork and school activities, past supports, accommodations that have been helpful to the student, and the student’s strengths and needs. This section may be filled out independently by the student or completed with the student through an interview.

The Summit Task Force’s SOP template described in this paper was not intended to be used in a prescriptive manner, but could be modified, shortened, or adjusted as appropriate to fit the needs of the school and individual students. The template may serve as a resource or reference for districts that are developing their own SOP form, providing a helpful structure of key components. State departments of education and school districts have recently begun developing SOP forms and guidelines. Although the NJCLD has not endorsed any particular State or district’s SOP, a number of examples are included in the resources section of this paper.

**Survey Information**

The NJCLD requested copies of documentation guidelines from various postsecondary institutions through AHEAD and LDA. The purpose of the analysis was to categorize key
documentation variables required by postsecondary institutions and to identify any patterns or incongruities that may point to areas of compromise or to future strategies that could help to bridge or even eliminate existing documentation gaps (Gormley et al., 2005).

Approximately 100 postsecondary institutional guidelines were evaluated, with five topics targeted for review: currency of the testing, examiner qualifications, required diagnostic areas, required or suggested tests, and unaccepted tests. A summary of the compiled data follows:

- Ninety-six percent of the respondents indicated that an office of disability services makes final decisions regarding eligibility, and 53% used their professional judgment when making decisions.
- Forty-five percent considered testing to be “current” if it were 3 years old or less; 3% if 5 years old or less; and 17% if it were “recent.”
- Seventy-five percent of the postsecondary service providers relied on recommendations for the requested accommodations and the reasonableness of the requests; 67% when making their decisions.
- Sixty-seven percent suggested specific tests that they consider acceptable for documenting an LD. Having advance knowledge of which institutions preferred which tests may help guide evaluation teams in their choice of instruments.
- Twenty-five percent used some form of discrepancy model to document an LD.
- Seventy percent used the ADA and Section 504 language to guide their documentation decisions; 30% used the former AHEAD guidelines (determined by AHEAD in 2003 to no longer provide appropriate guidance), and 14% used statewide guidelines.
- Thirty-nine percent used the IEP/504 Plan when considering eligibility and requests for accommodations, but do not consider them sufficient in making eligibility and accommodation decisions.
- Forty-two percent required adult-normed assessments.

Summary and Recommendations

This disconnect between the nature and extent of disability documentation generated by the K–12 system and how it is used by postsecondary institutions will not likely be reconciled easily. However, the NJCLD believes that we must move toward acknowledging the reasons for these differences and finding reasonable ways to resolve the issues. Students with documented LD who have received special education and related services in high school should be considered for appropriate services and accommodations in postsecondary education with a minimum of extra evaluation and cost. It also is important to find ways to use available secondary information to address student access to postsecondary education and not to deny services because a student is unable to afford a private evaluation. Additionally, policymakers at the local, state, and federal levels should work collaboratively to find solutions to these documentation barriers in order to expedite the process of accessing disability services in postsecondary settings.
Secondary and postsecondary personnel and families are interested in facilitating successful transition for students with LD. All stakeholders must collaborate and compromise as they acknowledge the legal, practical, and budgetary constraints of the current disconnect. In pursuit of that goal, the NJCLD makes the following recommendations:

**Secondary School Personnel**

1. Recognize that postsecondary service providers need information that addresses the following key legal questions:
   - Does the student have a disability as defined by Section 504 and ADA?
   - Does the disability result in functional limitations in the area of learning?
   - What accommodations should be provided to effectively address these functional limitations in the postsecondary context?

2. Inform the student and family that purposes and requirements for documentation differ from secondary to postsecondary education.

3. Inform students and parents that reevaluations and updated standardized assessments are not required under IDEA as part of the transition services.

4. Develop a list of community resources such as university-based clinics that offer psychological and educational evaluations and whether a sliding scale is available that can be provided to families.

5. Provide information that describes how the disability affects the student’s learning and life in general. How does the disability functionally limit the student’s performance?

6. Collect and organize documentation data in an ongoing manner as part of the transition process to make the Summary of Performance more effective and the process less burdensome.

7. Provide a comprehensive overview of the student’s functional performance. Collect the most recent formal and informal measures to describe the student’s abilities.

8. Inform the student and family that it is their responsibility to maintain documentation records, which may not be available after graduation. Refer to the 2007 *NJCLD Transition to School and Work* brochure for further information.

9. Include a history of accommodation use and its effectiveness, as in the following examples: (a) following the use of a note taker for all classes, there has been a dramatic increase in the student’s grades; (b) the student used a calculator on math assignments throughout his career; and (c) the student takes all exams in an environment with minimal distractions.
10. Include clear recommendations and explain the rationale for the accommodation requests in transition documents, because postsecondary service providers indicate the importance of these variables in their decision-making process.

11. Document any course substitutions or modifications, grades, and teacher reports, and the rationale for the changes. For example, if a student has struggled with foreign language, describe the student’s difficulties and the interventions that occurred.

12. Learn more about the laws regulating postsecondary institutions and communicate with postsecondary service providers to discuss practices that will meet mutual needs at both levels to facilitate student success.

13. Advise students and parents to contact prospective postsecondary institutions early in their selection process to determine what documentation is required.

**Families and Students**

1. Find a knowledgeable school-based professional (e.g., school counselor, special education teacher, general education teacher) who can serve as an advocate for your child to help guide the college search and transition process. This person can help organize information for applying for accommodations for college admissions tests, college applications, and documentation to submit to colleges.

2. Save a copy of all documentation even though it will become outdated. The documentation generated during a student’s K–12 experience will only be maintained by the school system for a limited time after graduation.

3. Participate in the development of your child’s Summary of Performance:
   - Collaborate with the secondary school personnel as they collect and organize documentation to provide a comprehensive overview of your child’s functional performance.
   - Review your child’s most recent informal and formal evaluation data.
   - Document the accommodations that were provided to your child, including those for all testing situations.
   - Ensure that the documentation contains a diagnosis of the specific learning disability, current functional limitations that result, and postsecondary level accommodation recommendations.

4. Review documentation requirements of the colleges you are considering. Start this early in your child’s high school career.
5. Meet with the disability service provider at all colleges your child visits. Ask the disability service provider for the documentation requirements and any written information that is available to share with school personnel.

6. Seek a private evaluation, as necessary. Share with the clinician the documentation requirements from the specific colleges to which your child has applied.

7. Review the extensive list of practical resources at the end of this document to help you successfully navigate this process.

Postsecondary Personnel

1. Provide prospective students and their families who are investigating available disability services information about the different purposes and requirements for documentation as compared to K–12 settings. Inform students and their families that secondary personnel are not required under IDEA to provide a reevaluation or updated standardized assessments as part of their transition services.


3. Post information on the postsecondary setting’s Web site articulating documentation requirements and how to arrange opportunities for students to talk to a disability services provider about the requirements.

4. Encourage students to disclose their disability and submit documentation once they are accepted, rather than wait until after they are enrolled in classes and experiencing difficulties.

5. Whenever feasible, if requested by the student, review submitted documentation once the student is accepted to determine eligibility, rather than wait until the student has agreed to matriculate. This will allow the student to make an informed college selection.

6. Learn about the laws regulating K–12 practices to better understand the limitations at the secondary level, and communicate with secondary-level providers regarding practices that will meet mutual needs and facilitate student success.

7. Participate in professional development opportunities that provide information about relevant provisions in the ADA, IDEA 2004, NCLB, and Section 504.
Policymakers

1. Fund a Federal Interagency Coordinating Council to ensure that the documentation process for secondary students transitioning to postsecondary settings is seamless.

2. Provide a mechanism for families, school districts, institutions of higher education, and state departments of education to collaborate in the development of policies and Summary of Performance procedures.

3. Make funding available to ensure that students have the documentation required to transition to the postsecondary level.

Conclusion

This NJCLD paper outlines important concerns about documentation issues related to transitioning from high school to postsecondary education institutions. These issues center on the disconnect between the nature and extent of disability documentation generated during a student’s public school career and the documentation required at the postsecondary education level to access services. The challenges presented by this disconnect have no simple answers given the legal, practical, and philosophical differences between these two educational entities. However, the NJCLD urges new ways of thinking, increased flexibility, and active collaboration from both secondary and postsecondary educators.

A major tenet of this paper is that all persons involved in the transition of students with LD from high school to postsecondary institutions must familiarize themselves with the issues and constraints of those in different educational settings. The NJCLD believes that both secondary educators and postsecondary service providers are committed to enhancing successful and equitable outcomes for students with LD. Our shared goal of student success provides an excellent basis upon which we can commit to working together to create a smooth process that assures students the availability of appropriate services to support retention and eventual graduation. The issues are not insurmountable, but it is only through mutual understanding, joint advocacy, commitment, and collaboration that we will find ways to reconcile the very different legal structures, financial considerations, and processes under which secondary and postsecondary programs must operate.
References


Web Resources

Association on Higher Education and Disability: IDEA 2004 and AHEAD
www.ahead.org/resources/ideabodletter.htm

College of William and Mary: Training and Technical Assistance Center
Writing the summary of performance. (May/June 2006).
www.wm.edu/ttac/articles/transition/transitiontime_mayjune2006.htm


www.nasponline.org/communications/spawareness/postsectransitions.pdf

National Center for Learning Disabilities
- IDEA parent guide. Chapter 8: Transition planning your child’s future success
  www.nclld.org/content/view/909/456093/

- Transitioning From High School to College Symposium
  Co-sponsored by the Educational Testing Service (ETS) and NCLD
  www.nclld.org/content/view/1092/389/

- Transition to college: Strategic planning to ensure success for students with learning disabilities

National Center on Secondary Education and Transition
- Preparing for post secondary education
  www.ncset.org/topics/preparing/default.asp?topic=6
- Post secondary education supports and accommodations
  www.ncset.org/topics/psesupports/default.asp?topic=5


http://www.ed.gov/about/offices/list/ocr/transitionguide.html

U.S. Department of Education, Office of Special Education, IDEA 2004 Web site
http://idea.ed.gov/
• Topic brief on secondary transition
http://idea.ed.gov/explore/view/p%2Croot%2Cdynamicle%2CTopicalBrief%2C17%2C
Sample Summary of Performance Guidelines and Forms*

Colorado State Department of Education: Summary of performance
www.cde.state.co.us/cdesped/download/Word/SOP_SummaryPerformance.doc

Connecticut State Department of Education: Summary of performance

Georgia Department of Education: Summary of performance
www2.gsu.edu/~wwwrld/SummaryofPerformance.pdf

Kansas State Department of Education SOP guidelines
www.kansped.org/ksde/resources/trans/SopPurpose06.doc

Montgomery County (Maryland) Public Schools: Exit document
www.mcps.k12.md.us/departments/specialed/exit.shtm

National Transition Documentation Summit summary of performance model template. (2005). Available to be freely copied or adapted for educational purposes. Download from the Council for Exceptional Children’s Web site:

New Hampshire Department of Education: Summary of performance forms (see Special Education Memo 18)
www.ed.state.nh.us/education/doe/organization/instruction/SpecialEd/SPED2006.htm

Oregon State Department of Education: Summary of performance form
www.ode.state.or.us/pubs/forms/schoolage/1278-P.pdf

Virginia College Quest Web site
www.vacollegequest.org/index.shtml
Student summary of performance
www.vacollegequest.org/charting/performance_form.shtml

Virginia State Department of Education: Sample summary of performance
www.pen.k12.va.us/VDOE/sped/transition/summaryofperformance.doc

*Note to reader: All Web links correct and functioning as of June 11, 2007.
Appendix

Available online: www.ahead.org/resources/bestpracticesprinciples.htm

AHEAD presents the following principles as the foundation for policies and best practices used by postsecondary institutions as they establish disability documentation guidelines and determine accommodations for students with disabilities.

- All documentation should be reviewed on an individual, case-by-case basis

  This calls for an individualized inquiry, examining the impact of a disability on the individual and within the specific context of the request for accommodations. There is no list of covered disabilities or accepted diagnostic criteria. Institutional documentation policy should be flexible, allowing for the consideration of alternative methods and sources of documentation, as long as the essential goal of adequately describing the current impact of the disability is met.

- Determination of a disability doesn’t require the use of any specific language

  Service providers should avoid elevating form over substance in documentation guidelines, e.g., the temptation to require specific language, such as “learning disability.” Clinicians’ training or philosophical approaches may result in their use of euphemistic phrases, rather than specific diagnostic labels; this practice should not be automatically interpreted to suggest that a disability does or does not exist.

- Presented documentation can be augmented through interview

  Service providers are encouraged to contact the evaluator, as necessary, for clarification of any information (test results, conclusions, recommendations, etc.) contained in documentation. An interview, filtered by the service provider's professional judgment, is extremely valuable in substantiating the existence of a disability, understanding its impacts and identifying appropriate accommodations.

- Determination of accommodations is an interactive process

  The individual with a disability is an excellent source of information on strategies that maximize access. In the context of documentation and accommodation planning, the individual is a rich, reliable, and valid source of information on the impact of the disability and the effectiveness of accommodations. The individual with a disability may be provided with his or her first choice of accommodation or an alternative, effective accommodation determined by the institution. While
objective confirmation (documentation) is legitimate, so are the lived experiences of the individual.

- Documentation of a specific disability does not translate directly into specific accommodations

  Reasonable accommodations are individually determined and should be based on the functional impact of the condition and its likely interaction with the environment (course assignments, program requirements, physical design, etc.). As such, accommodation recommendations may vary from individual to individual with the “same” disability diagnosis and from environment to environment for the same individual.

- Disability documentation should be treated in a confidential manner and shared only on a need-to-know basis

  Disability-related information should be collected and maintained on separate forms and kept in secure files with limited access.

- Information on the individual’s disability is only one component of providing access

  Many barriers to full participation reside in the environment (physical, curricular, attitudinal, informational) where proactive redesign can favorably impact sustainable access. Service providers are encouraged to work to increase overall accessibility through system change that makes the institution more inclusive and reduces the need for individual accommodation.