

# Policy for Documentation





# Introduction

*The ACT Policy for Documentation* contains information individual examinees, professional diagnosticians, and qualified officials at educational programs/schools need in order to provide appropriate documentation to support requests for accommodations on the ACT® test.

## This document discusses the following topics:

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## Preparation of the ACT Policy for Requests and Documentation

In preparing this policy document, ACT sought the counsel and advice of numerous professionals who test and diagnose individuals with disabilities. These professionals also have experience with the preparation of documentation to support requests for accommodations when taking standardized tests. ACT acknowledges and appreciates their valuable contributions.

## Use of This Information

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## Guiding Principles for Determining Accommodations on the ACT

ACT approves accommodations for examinees with disabilities in accordance with the *Americans with Disabilities Act* (ADA) and has adopted the following guiding principles for responding to requests for accommodations on the ACT.

1. **Fair:** Requirements and procedures for test accommodations must ensure fairness for all examinees, both those seeking accommodations and those testing under standard conditions.
2. **Consistent:** Accommodations must be consistent with ADA requirements and appropriate and reasonable for the documented disability.
3. **Valid:** Accommodations must not result in an undue burden, as that term is used under the ADA, or fundamentally alter that which the test is designed to measure.
4. **Professional:** Documentation of the diagnosis must meet guidelines that are considered to be appropriate by qualified professionals and must provide evidence that the person's impairment substantially limits one or more major life activities. Applicants must also provide information about current and/or prior accommodations made in similar settings, such as in academic classes and other testing situations.

## Documentation Requirements

### Policy for Documentation

The ADA defines a disability as a mental or physical impairment that substantially limits a major life activity compared to the average person in the general population. The guidelines of the *Diagnostic and Statistical Manual of Mental Disorders*, 4th or 5th Edition (DSM-IV or DSM-5) are used to substantiate the presence of a disabling condition.

To qualify for ACT-Approved Accommodations, documentation must show:

- The diagnosed condition substantially limits one or more major life activities.
- Requests for accommodations are appropriate and reasonable for the documented disability.

### Qualified Diagnosticians

The administration of diagnostic assessments, determination of specific diagnoses, and recommendation of appropriate accommodations must be made by a qualified professional whose credentials are appropriate to the disability. The name, title, and professional credentials (e.g., degrees, areas of specialization, license or certification, employment) must be clearly stated in the documentation. For physical disabilities, documentation must be provided by a qualified physician.

## Criteria for Diagnostic Documentation

To best assess the current impact of an examinee's disability or functional limitations as they apply to the test taking process, documentation must be written by a qualified professional and must meet all of these guidelines:

- States the specific impairment as diagnosed.
- Is current (diagnosed or reconfirmed within three academic years of the date of the request).
- Describes presenting problems and developmental history, including relevant educational and medical history.
- Describes substantial limitations (adverse effects on learning, or other major life activities) resulting from the impairment, as supported by test results.
- Describes why recommended accommodations are needed, and provides rationale explaining how these specific accommodations address the substantial limitations and alleviate the impact of the disability when taking a timed standardized test.
- Establishes the professional credentials of the evaluator, including information about licensure or certification, education, and area of specialization.
- Includes comprehensive assessments (neuropsychological or psychoeducational evaluations), with evaluation dates, used to arrive at the diagnosis.

## Specific Documentation Needed

The following information explains what documentation is needed to support the accommodations request.

1. To show whether accommodations have previously been provided in an academic setting or on other standardized tests due to the disability, the evaluator(s) and/or qualified school officials must provide one of these documents.
  - If accommodations have been provided, include the special education service or accommodations pages from a current Individual Education Program (IEP), Section 504 Plan or Official Accommodations Plan.
  - If no accommodations have been provided, include a detailed explanation of why no accommodations were used in the past and why accommodations are needed at this time.
2. In addition, complete diagnostic documentation may or may not be required as explained below.
  - Complete diagnostic documentation must be submitted if:
    - The initial diagnosis was made within the three years prior to the request for accommodations.
    - The diagnosed disability is a visual, hearing, psychological, emotional or physical disorder.
    - Accommodations in addition to extended time or an alternate format are requested.
  - Complete diagnostic documentation is not needed if:
    - The reconfirmation of a diagnosis is updated within one year prior to the request for accommodations. ACT accepts the school's verification of appropriate documentation being on file at the school. However, ACT reserves the right to request copies of documentation from the school to verify compliance.

## Substantiation of Diagnosis

Documentation must provide a comprehensive evaluation with objective evidence of an impairment that causes a substantial limitation to a major life activity. The documentation must also indicate how the impairment interferes with the person's ability to take the ACT, and the specific recommendations for test accommodations required. If evaluative data is required, documentation must include standard scores and/or percentiles, including subtests from reliable, valid and standardized measures.

The information needed for each category of disability is provided below.

### Learning Disabilities

The applicant must provide the results of age-appropriate diagnostic testing performed by a qualified professional. Documentation must address the following:

1. Description of the presenting problem(s) and its (their) developmental history, including relevant educational and medical history;
2. Neuropsychological or psychoeducational evaluation which includes results of an intellectual assessment using a complete and comprehensive battery;
3. Results of a complete achievement battery;
4. Other appropriate assessments for consideration of a differential diagnosis from co-existing neurological or psychiatric disorders;
5. Specific diagnosis and evidence that alternative explanations were ruled out; and
6. Description of the functional limitations supported by the test results and a rationale for the recommended test accommodations specific to those functional limitations.

### Attention Deficit/Hyperactivity Disorder

The applicant must provide diagnostic results from an evaluation by a qualified professional. Documentation must address the following:

1. Original diagnosis (e.g. date/age/grade, diagnosing professional, symptoms/impairment, course of treatment, and educational/behavioral/social interventions);
2. Evidence of childhood onset before age 12 (symptoms of inattention, hyperactivity or impulsivity demonstrated in two or more settings);
3. Evidence of current impairment, including:
  - a. A statement of presenting problems (e.g. academic failure or significant struggle, poor social/familial functioning, relationships, behavioral problems);
  - b. A diagnostic interview.
4. A ruling out of alternative diagnoses and explanations;
5. Relevant testing using reliable, valid, standardized, and age-appropriate assessments to determine functional limitation (e.g. intellectual, achievement, neuropsychological, and rating scale measures from multiple sources);
6. Number of applicable DSM-IV or DSM-5 criteria and description of how the criteria impair the examinee (e.g. measurable impairment in academic achievement, social functioning, sports, extracurricular activities, employment, clubs, daily adaptive functioning, and/or executive functioning. Failure to finish timed tests cannot be used in isolation to demonstrate impairment); and
7. Specific ADHD diagnosis (ADHD-Predominantly inattentive, ADHD-Predominantly hyperactive/impulsive; ADHD- Combined; ADHD-NOS or Unspecified).

## **Psychiatric Disorders—Mood or Anxiety Disorders or Serious and Persistent Mental Illness**

Documentation must address the following:

1. Specific diagnosis;
2. Age of onset and the course of the illness;
3. Psychological tests used;
4. The history of treatment for the disorder, including medication and/or psychotherapy;
5. Evidence of current impairment, including a statement of presenting problems (e.g. academic failure or significant struggle, poor social/familial functioning, behavioral problems); and
6. In addition, please tell us how the examinee's impairment affects his/her functioning across settings. Observations and/or rating scales of the examinee's functional limitations in academic achievement, behavior, mood, and/or adaptive functioning may be helpful.

**Due to the variable nature of these conditions, documentation of a psychiatric disorder must be within the past year.**

### **Visual Impairment**

The applicant must provide diagnostic results from a complete ocular examination performed by an optometrist or ophthalmologist. Documentation must address the following:

1. Specific ocular diagnosis;
2. Record of complete, current (within past 12 months) ocular examination including: chief complaint, history of illness, visual acuity, complete ocular motility exam (versions, tropias, phorias, stereopsis), slit lamp exam, visual field, pupil exam, optic nerve, and retina; and
3. If the diagnosed condition is purported to affect reading, results of a measure of reading (decoding, rate, and comprehension) are required. Examples of acceptable measures of reading include the WIAT-III and GSRT. Assertions of poor reading speed (or other conditions requiring additional time) made by vision professionals must be corroborated by educational and/or psychometric data. Letters from an eye care professional and/or a Visagraph score are not acceptable as evidence of reading problems requiring extended time on the ACT.

### **Hearing Impairment**

The applicant must provide diagnostic results from a full hearing test performed by a qualified professional. Documentation must also address the following:

1. Relevant medical history, including date of hearing loss;
2. Specific diagnosis;
3. Description of functional limitation (with and without any hearing aids or assistive devices or treatments);
4. Related educational history, including information regarding reading and language skills; and
5. Specific recommendation for accommodation(s) and accompanying rationale.

## **Autism, Asperger's Disorder, Pervasive Developmental Disorder or Autism Spectrum Disorder**

Documentation must address the following:

1. Original diagnosis (e.g. date/age/grade, diagnosing professional, symptoms/impairment, course of treatment);
2. Current and prior psychoeducational or neuropsychological evaluations;
3. A history of special education interventions (e.g. specialized instruction, self-contained classrooms or schools, one to one aides, exemptions from proficiency or graduation exams);
4. Current information regarding adaptive behavior, attention, executive functioning, language skills, and mental health; and
5. Rationale for accommodations, based on current impairment.

## **Speech and Language Disorders**

Documentation must address the following:

1. Specific diagnosis and a description of the presenting problems;
2. Developmental history including relevant educational history;
3. Results of speech and language assessments, including measures of expressive and receptive language, and communication skills;
4. Evidence that demonstrates the current impact of a speech and language disorder on reading, written expression and/or learning; and
5. Description of the functional limitations supported by the test results and a rationale for the recommended test accommodations specific to those functional limitations.

## **Medical Conditions**

Documentation must address the following:

1. Specific diagnosis and age/date of onset;
2. Current and/or prior course of medical treatment, including the impact of medical treatment specific to the examinee;
3. Current and/or prior therapy outcomes (e.g. physical, occupational and/or speech therapy, mental health counseling/psychiatric treatment);
4. Current impact on examinee's education (e.g. school absence, hospital and/or homebound status, reduced school schedule); and
5. Current impact on academic functioning (e.g. psychoeducational or neuropsychological evaluations, grade reports, transcripts, and/or other standardized testing).

## **Traumatic Brain Injuries**

Documentation must address the following:

1. The date of accident;
2. Status and diagnosis upon hospital admission;
3. Length of hospital stay;



4. Discharge date, review of type and outcome of outpatient therapy (Occupational Therapy, Physical Therapy, Speech Therapy), if applicable;
5. Length of school absence and/or confirmation of any homebound service or reduced school schedule; and
6. Evidence of continued educational impairment and its relationship to the requested accommodations, as supported by objective data. Examples include:
  - a. A complete evaluation of intellectual, neurocognitive and academic skills, using acceptable batteries of assessment. Impact results cannot be used in isolation to demonstrate psychological or neuropsychological impairment.
  - b. Observations and/or rating scales of the examinee's functional limitations in academic achievement, behavior, mood, and/or adaptive functioning.
  - c. Interventions provided by the examinee's school.

The above information may be strengthened by the submission of letters from teachers discussing specific ways in which the condition affects the examinee in the classroom, and in testing situations or submission of completed **Teacher Survey Forms ([www.act.org/aap/pdf/TeacherSurveyForm.pdf](http://www.act.org/aap/pdf/TeacherSurveyForm.pdf))**.

Each request for accommodation is evaluated on a case-by-case basis using the information described above. If a particular element of documentation is not provided, the diagnostician must explain why it is not included in the submission.

## Procedures for Implementation

### **Requesting Extended Time or Other Accommodations on National Test Dates**

Procedures for requesting accommodations on the ACT for National Extended Time or Special testing, and information about the review and implementation process are found at **[www.actstudent.org](http://www.actstudent.org)**.

### **Requesting Accommodations for State and District Testing**

Procedures for requesting accommodations on the ACT for State and District testing, and the review and implementation process is provided to school officials who are responsible for submitting requests on behalf of the examinees at their school. The information is located on each testing program's website. The url to the website is found at the top of the Schedule of Events provided to school officials by ACT.

## Review Process

ACT will make the final determination regarding appropriate and reasonable testing accommodations on the ACT for individuals with documented disabilities. The process for review of accommodations requests is explained below.

Stage	Description
1	<ul style="list-style-type: none"> <li>Requests and supporting documentation are sent to ACT.</li> </ul>
2	<ul style="list-style-type: none"> <li>ACT receives requests and documentation</li> <li>Initial review is conducted by trained ACT staff, and processed in one of two ways: <ul style="list-style-type: none"> <li>The request is sent to a staff specialist for the next level of review.</li> <li>Notification and request for missing information is sent.</li> </ul> </li> </ul> <p><b>Note:</b> The examinee, or the examinee's parent or guardian, if the examinee is under 18, must sign a statement authorizing release of diagnostic information by school officials to ACT. Without this release, the review can go no further.</p>
3	<ul style="list-style-type: none"> <li>The next level of review is conducted by ACT staff specialists, and processed in one of three ways: <ul style="list-style-type: none"> <li>The request is approved.</li> <li>The request is sent to an expert reviewer with specific training in an appropriate clinical area.</li> <li>Notification and request for missing information is sent.</li> </ul> </li> </ul>
4	<ul style="list-style-type: none"> <li>If applicable, the third level of review is conducted by an expert reviewer, and processed in one of two ways: <ul style="list-style-type: none"> <li>The request is approved.</li> <li>The request cannot be approved. The expert reviewer provides a written review to ACT.</li> </ul> </li> <li>Notification and request for missing information is sent by ACT.</li> </ul>
5	<ul style="list-style-type: none"> <li>Additional information is sent to ACT.</li> </ul>
6	<ul style="list-style-type: none"> <li>ACT receives additional information and reconsiders the request.</li> </ul> <p><b>Note:</b> If time does not allow for resolution prior to the requested test date, the request will be considered for a later test date.</p>

## **Notification of Approved Accommodations**

The information below explains the notification process of ACT-Approved Accommodations for National and Special testing, and State and District testing.

### **National Testing**

- If the only accommodation requested and approved is extended time, the examinee is notified on the admission ticket and the test center is notified on a separate roster.
- If other accommodations are approved, ACT staff contact the test coordinator at the requested test center to determine whether the center will be able to provide the approved accommodations. If the requested test center is unable to provide all the approved accommodations, another test center (usually the examinee's indicated second choice) is contacted. Once the test center is assigned, a confirmation letter is sent to the test coordinator, identifying the examinee and confirming the reporting time, the reporting location, and the precise accommodations to be provided. The examinee is sent a copy of this confirmation letter.

### **Special Testing**

- The school official and the examinee will receive notification of all ACT-Approved Accommodations and will collaborate to make arrangements for testing within the applicable testing window.

### **State and District Testing**

- The school official will receive notification of all ACT-Approved Accommodations and will make arrangements to test the examinees accordingly.

## **Confidentiality**

All documentation submitted to ACT is kept confidential, and is used solely to determine eligibility for test accommodations. School officials are instructed to treat all information they receive relative to the examinee's disability and accommodations as confidential. ACT Score Reports do not include any specifics about the disability or accommodations provided.