

Basic Skills Tests, Academic Skills Tests for Adults, General Educational Development (GED) Tests, Licensure Examinations, and Accommodations and Exemptions for Students with Disabilities

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Statement of the Problem and Purpose

This technical assistance paper was originally disseminated in January 2000, to provide information to staff working on behalf of students with disabilities. The 2010 revision reflects changes in terminology, state statute, and Florida Administrative Code (F.A.C.), as well as additional content.

Questions have arisen concerning basic skills testing, academic skills testing for adults, General Educational Development (GED) Tests, certification and licensure examinations, and accommodations and exemptions for students with disabilities. The purposes of this paper are to: (1) clarify requirements for basic skills testing, academic skills testing, GED Tests, and certification/licensure examinations; (2) describe requirements for accommodations for students with disabilities; (3) recommend examples of testing accommodations that may be needed by some students with disabilities; and (4) describe allowable exemptions for students with disabilities. Topics to be addressed include:

- basic skills testing requirements
- requirements for academic skills testing for adults
- procedures for GED Tests
- examination requirements for certification and licensure (including industry certification)

Basic Skills Testing Requirements

Background

Rule 6A-10.040, F.A.C., Basic Skills Requirements for Postsecondary Career Certificate Education, requires students who are enrolled in a postsecondary career and technical education program offered for career education credit of 450 hours or more to complete a basic skills examination within the first six (6) weeks after admission into the program. The examination is designed to assess student mastery of basic skills. Examinations meeting the basic skills requirement include: Tests of Adult Basic Education (TABE), Complete Battery or Survey Form, Forms 9 & 10, 2003; Florida College Entry-Level Placement Test or Multiple Assessment Placement Service (MAPS), where authorized; and Wonderlic Basic Skills Test (WBST), 1994. Standards established for test administration and interpretation set forth in *Standards for Educational and Psychological Testing* (APA, AERA, NCME, 1992) must be followed, and appropriate accommodations for students with disabilities, as specified in Rule 6A-1.0943, F.A.C., must be provided.

Rule 6A-1.0943, F.A.C., Statewide Assessment for Students with Disabilities, defines accommodations as “adjustments to the presentation of the assessment questions, method of recording examinee responses to the questions, schedule for administration of the assessment, or use of assistive devices to facilitate administration of the assessment” (Rule 6A-1.0943(2), F.A.C.).

Rule 6A-10.040, F.A.C., Basic Skills Requirements for Postsecondary Career Certificate Education, states that students who do not achieve the minimum level of basic skills required for their programs will not be awarded a career certificate of completion. This requirement applies to students who complete the entire program. Adult students with disabilities, as defined in section 1004.02(7), Florida Statutes (F.S.), may be exempted from the provisions of this rule. Section 1004.02(7), F.S., defines adult students with disabilities as those who have a “... physical or mental impairment that substantially limits one or more major life activities ... a record of such impairment, or who is regarded as having such an impairment, and who require modifications to the educational program, adaptive equipment, or specialized instructional methods and services in order to participate in workforce development programs that lead to competitive employment.” Exceptional students (except gifted) as defined in section 1003.01, F.S., may also be exempted from meeting the basic skills level requirement to earn a career certificate of completion. Each school district and institution within The Florida College System (also known as Florida colleges) must adopt a policy addressing procedures for exempting eligible students with disabilities from the basic skills exit requirement as permitted in section 1004.91(3), F.S., and Rule 6A-10.040(4), F.A.C. The steps for exempting a student with a documented disability are as follows:

1. Pre-test using TABE or other test identified in rule to determine the student’s strengths and weaknesses
2. Provide instruction based on the student’s assessment
3. Post-test to determine gains
4. If the student does not meet the exit requirements on the TABE or other test identified in rule, but has met the requirements of his/her career program, exempt the student from the basic skills requirements and report the student as a completer (See *Career Education Basic Skills Assessment* TAP, available at http://www.fldoe.org/workforce/programs/spec_nds.asp)

Implications and Guidelines

Some students with disabilities may need special accommodations during the testing and instructional process (including remediation). These accommodations must be provided to ensure equal access to career and technical education programs and activities. Rule 6A-10.040, F.A.C., includes permissive language that allows local educational agencies (LEAs) to exempt adults with disabilities from meeting the required basic skills level to earn a career certificate of completion. Since application of the exemption is permissible and not mandatory, each school district and Florida college must adopt a policy to address this issue and ensure that the policy is followed consistently throughout the LEA's service area. The policy should not deny anyone access or opportunities because of a disability.

The Technical Assistance Paper (TAP), *Career Education Basic Skills Assessment*, provides comprehensive information about the assessment process, including: legal basis; procedures; counseling; exemptions/waivers; and accommodations. The TAP addresses frequently asked questions concerning, for example: (1) basic skills assessment and students who are dual enrolled; and (2) exemption policies.

All career education students enrolling in career education programs of 450 hours or more must be tested within the first six (6) calendar weeks after admission into the program. The purpose of testing is to determine the extent of basic skills mastery and to evaluate the need for necessary academic instruction. This applies to all postsecondary career education students, including secondary students dual enrolled in postsecondary career education certificate programs. Exceptions include those exempted in s. 1004.91, F.S.

Testing may not be used as a screening device. Students may not be denied entry into a career education program based solely on a test score. Students with disabilities must be tested and provided academic instruction if needed, although they may be exempted from meeting the basic skills exit requirements for his/her career education program. The procedure for this exemption must be determined by district or board of trustees policy and must be documented. This policy should be written and approved by the school board or Florida College Institution board of trustees.

The intent of the exemption provision is to provide opportunities for remediation, if needed, but to avoid penalizing a student who may not be able to master the required basic skills *exit* score due to a disability. It is recommended that students with disabilities be tested, with appropriate accommodations as needed, and participate in remediation (if needed) concurrently with the career and technical education program. However, if the student has demonstrated mastery of the student performance standards for the program, but has not attained the appropriate basic skills score, the LEA may use the exemption, code the student as a completer, and award an appropriate certificate. The certificates should not have the effect of identifying the student as an individual with a disability. Local policy should describe the steps to be followed and documentation to be maintained throughout the testing, remediation, certification, and reporting process.

Information about basic skills testing is available from the Florida Department of Education (FLDOE), Division of Career and Adult Education, Career and Technical Education Programs Section, 325 West Gaines Street, Suite 714, Tallahassee, Florida 32399, telephone: (850) 245-0446. Information is also available at the following website: http://www.fldoe.org/workforce/programs/spec_nds.asp.

Requirements for Academic Skills Tests for Adults

Background

Students who choose to enroll in adult general education programs must complete academic skills tests for diagnostic, instructional, and accountability purposes.

Rule 6A-6.014, F.A.C., General Requirements for Adult General Education Program, lists approved tests for use in the adult general education program. The approved tests for students enrolling in Adult Basic Education, Adult High School, GED Preparatory and Pre-GED are: (1) Comprehensive Adult Student Assessment System (CASAS); and, (2) Tests of Adult Basic Education (TABE), Complete Battery or Survey Form, Forms 9 and 10. Approved tests for students enrolling in Adult ESOL courses include: (1) Basic English Skills Test (BEST) Literacy; (2) BEST Plus; (3) CASAS; and, (4) TABE Complete Language Assessment System – English (CLAS-E). Approved tests for students enrolling in Vocational Preparatory Instruction (VPI) are: (1) TABE; (2) Florida College Entry-Level Placement Test (CPT); and (3) Wonderlic Basic Skills Test (WBST). *All* students, including adults with disabilities, are required to participate in testing unless the student is enrolling in one or both of the following: (1) General Education Promotion; or (2) Workplace Readiness Skills for Limited Proficient Adults.

Adult education students with disabilities are responsible for self-identification and for requesting any accommodation they may need. Adult education students are also responsible for submitting documentation of their disability. Testing accommodations must be provided to students with disabilities on an individual basis if needed (section 1004.02(7), F.S.). Rule 6A-6.014, F.A.C., also allows for alternate assessment instruments for adult students with disabilities when the instruments listed above do not meet the assessment needs of a particular adult student.

Implications and Guidelines

Adult general education programs serve students with disabilities representing a wide range of abilities and needs. LEAs must ensure that adults with disabilities have appropriate accommodations throughout the testing and instructional process. It is recommended that LEAs develop a local procedures manual that aligns with state policy addressing testing and instruction for adults with disabilities in adult general education programs to ensure equal access and accurate documentation of the student's strengths and needs.

In the required academic skills testing, the first test administration is for diagnostic purposes and to establish baseline data for the individual student. This information should be used in the student's Adult Individual Educational Plan (AIEP) or other appropriate instructional plan. Students should be retested according to the test publisher guidelines to document mastery of skills and to determine further instructional needs.

It may appear that certain students with disabilities are unable to function at a level necessary to perform on the approved academic skills tests listed above. However, an attempt must be made to test *all* students and appropriate accommodations should be provided as needed. If a student is still unable to adequately respond in the testing situation, the examiner must document the attempt to test (including accommodations), describe the level of student response, and explain why the student was unable to respond. Then, the examiner should use another test/strategy, described in the local procedures manual, to document the student's strengths and weaknesses and recommend

appropriate instructional programming (including accommodations). It is critical that all staff follow the LEA testing policy consistently. The local procedures manual should describe the steps to be followed and documentation to be maintained throughout the testing, remediation, certification, and reporting process.

Information about adult general education is available from the Florida Department of Education (FLDOE), Division of Career and Adult Education, Adult Education Section, 325 West Gaines Street, Suite 744, Tallahassee, Florida 32399, telephone: (850) 245-0450. Information is also available at the following website:
<http://www.fldoe.org/workforce/AdultEd>.

Procedures for General Educational Development (GED) Tests

Background

A State of Florida high school diploma may be awarded to candidates who meet all the requirements specified in Rule 6A-6.021, F.A.C., including passing the GED Tests and attaining the appropriate scores. The guide, *GED Testing Service Policies and Procedures Manual (2008)*, provides guidelines for test administration procedures for adults with disabilities who need special accommodations. A Web link to these guidelines can be found at: <http://www.fldoe.org/workforce/ged/pdf/gedts.pdf>. The guidelines address the following topics: Background and Philosophy on the GED Policy on Special Accommodations in Testing; Special Editions and Accommodations; and Verification of Need and Approval of Special Testing.

Implications and Guidelines

The GED policy on special accommodations in testing states:

The GED Testing Program has long provided accommodations to candidates who have disabilities. In an effort to make GED Tests accessible to all applicants, accommodations are made for candidates who have diagnosed physical, mental, sensory, or cognitive disabilities and who provide appropriate documentation from a qualified professional of their impairment and its effect on their ability to take the GED Tests under standard conditions.

POLICY: Official GED testing centers shall provide appropriate accommodations for GED candidates with documented disabilities in accordance with the Americans with Disabilities Act (ADA) and the Canadian Charter on Rights and Freedom.

When disabilities are properly documented ... and when accommodations are approved by the GED Administrator ... the GED Examiner must arrange to test the GED candidate using the approved accommodations. The additional costs, if any, associated with providing such services may not be charged to the candidate. (*GED Testing Service Policies and Procedures Manual, 2008, p. 71*).

Candidates with documented disabilities may request the option of completing: (1) the regular edition of the GED Tests with accommodations in the testing environment/procedures; (2) a special edition of the GED Tests; or (3) a special edition of the GED Tests with accommodations in the testing environment/procedures. Within Florida, the GED Tests are available in English, French and Spanish. If a testing center does not purchase French and Spanish versions, these are available to be checked out from the Florida GED Testing Office's Lending Library. Special editions of the tests include audiocassette, Braille, and large print. Reference manuals accompany the Braille and audiocassette editions for use during the tests by the Chief Examiner and/or candidates with at least partial vision. The special editions meet all the specifications of the regular print editions and are of the same level of difficulty. Information on accommodated testing of GED candidates with disabilities can be found in the *GED Testing Service Policies and Procedures Manual*. A copy of this document is posted at the following Web link: <http://www.fldoe.org/workforce/ged/pdf/gedts.pdf>.

A range of test accommodations is available based on the individual needs of candidates with disabilities. Common examples of accommodations include: extra time; private room; supervised breaks; scribe; and use of calculators. Readers are *not* an allowable accommodation. Because the GED Tests are available on audiocassette, the tests may *not* be read to examinees. Specific guidelines for accommodations are described in the *GED Testing Service Policies and Procedures Manual*.

The need for accommodations must be fully documented by a qualified and competent professional. Professionals qualified to document need for special testing include medical doctors, psychologists, and educational diagnosticians. The professional must be qualified and licensed in a discipline relative to the disability. Nurse practitioners, physician assistants, registered nurses, and licensed practical nurses are not approved diagnosing professionals. The qualified professional must be able to provide verification that a special administration of the GED Tests is justified. An advocate for the GED candidate, such as a counselor, special education teacher, or social worker, while not qualified to diagnose the condition, may complete the appropriate request forms (see *GED Testing Service Policies and Procedures Manual*) and verify the candidate's need for accommodations using existing documentation. The purpose of verification is to ensure that only those examinees with qualifying physical, emotional, learning, or cognitive disabilities or attention deficit/hyperactivity disorder receive special accommodations and the use of special editions of the GED Tests. Approval for the use of the special editions (audiocassette and Braille) and for modifications of standard testing conditions must be obtained from the state GED Administrator. However, the large print edition may be used under normal time limits upon request of the examinee. In addition, the following adaptations do not require prior approval of the GED Administrator or GED Testing Service: colored transparent overlays, clear transparent overlays and a highlighter, temporary adhesive with spatial directions, earplugs, magnifying devices, priority seating, fluorescent lighting, one test per day, and straightedge. For special testing based on certain cognitive disabilities, and for any exceptions to the policies described in the *GED Testing Service Policies and Procedures Manual*, approval must also be granted by the GED Testing Service of the American

Council on Education. GED candidates may appeal decisions made by the GED Administrator or the GED Testing Service denying special testing accommodations using the Letter of Appeal-Special Testing Accommodations, available from local GED Testing Centers.

For further information about GED Tests, please contact your local GED/Adult Education Administrator, or call the GED Information Line at (850) 245-0449 or 1-877-352-4331 (Florida residents only). Information is also available at the following website: <http://www.fldoe.org/workforce/ged/>.

Examination Requirements for Certification and Licensure

Background

Certain programs require certification and/or licensure examinations to meet state or national regulations for employment (i.e., nursing, cosmetology, corrections, real estate). Several agencies are responsible for testing (either directly or through contracted services) and certification/licensure. Administering agencies are required to establish a process for providing accommodations to meet the requirements of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 as amended. The process includes guidelines for advertising the availability of testing accommodations as well as clarifying the procedure for individuals when requesting such accommodations. The Department of Business and Professional Regulation is responsible for the certification/licensure process for non-medical occupations (e.g., cosmetology, construction, barbering). The Department of Health is responsible for the certification/licensure process for medical occupations. The Department of Environmental Protection is responsible for the licensure/certification process for Drinking Water & Domestic Wastewater Treatment Plant operators as well as Water Distribution System operators. The following describes the process for requesting testing accommodations from these agencies.

Department of Business and Professional Regulation--Non-Medical Occupations

In accordance with Rule 61-11.008, F.A.C., Licensure Examinations Format and Examination Procedures for Candidates with Disabilities, the Department of Business and Professional Regulation provides reasonable and appropriate accommodations for individuals with documented disabilities who demonstrate a need for accommodations. The ADA and accompanying regulations define a person with a disability as an individual who has a physical or mental impairment that substantially limits one or more major life activities. The purpose of the documentation is to validate that the individual is covered under the ADA as an individual with a disability. The accommodations provided Special Testing candidates must "match up" with the identified functional limitation so that the area of impairment is alleviated by an auxiliary aid or adjustment to the testing procedure. Functional limitation refers to the behavioral manifestations of the disability that impede the individual's ability to function, i.e., what the individual can or cannot do

on a regular and continuing basis as a result of the disability. Documentation must provide a clear rationale for the identified functional impairment.

Specific accommodations are provided on an individual basis. Examples of accommodations include assistance in completing answer sheets, reader, extended testing time, extra or extended breaks, large print examination, and printed copy of verbal instructions read by the proctor. Applications for Disability Accommodation, available from the Bureau of Education and Testing - Special Testing, must be completed by the applicant and a physician or licensed practitioner (credentials of the physician need to be appropriate to the disability). The completed application with accompanying documentation, postmarked by the final published application deadline for the exam being taken, must be submitted to the Bureau of Education and Testing. Information about testing accommodations is available from the Department of Business and Professional Regulation, Bureau of Education and Testing - Special Testing, 1940 North Monroe Street, Tallahassee, Florida 32399-0791, telephone: (850) 487-9755. Information is also available at the following website:
<http://www.myflorida.com/dbpr/servop/testing/ADA.html>.

Department of Health--Medical Occupations

In accordance with Rule 64B-1.005, F.A.C., Special Testing Accommodations, the Department of Health will provide reasonable and appropriate accommodations to candidates with physical, mental, or specific learning disabilities to the extent permitted by cost, administration restraints, security considerations, and availability of resources. Accommodations provided will vary depending on the nature and severity of the impairment. Each case will be dealt with on an individual basis within the limits prescribed by law. In instances of national examinations, guidance will be sought from the national provider.

Reasonable accommodations include additional time, alternate setting, alternate recording of responses, alternate format, reader, and assistive devices. No accommodation or modification shall be made that adversely affects the security or integrity of the examination. Candidates requesting special assistance must file a completed application no later than sixty (60) days prior to the date of the licensure examination for which they are applying. Candidates who are accommodated must also have completed an application for licensure examination by the final published application deadline. Special testing accommodations may not be made if the application is submitted after the deadline. Applications for special testing accommodations should be requested well in advance of the deadline. The candidate must provide documentation of his/her disability completed by a psychologist, physician, osteopathic physician, podiatrist, optometrist or speech language pathologist and audiologist, licensed pursuant to State Statutes, with the completed application for special testing accommodations. The practitioner must be licensed in the appropriate field and his/her scope of practice must be related to the diagnosis of the disability.

Information about special testing accommodations is available from the Department of Health, Bureau of Operations, Testing Services, ATTN: Special Testing Coordinator, 4052 Bald Cypress Way, BIN #C-90, Tallahassee, Florida 32399-3290, telephone: (850) 245-4252, website: <http://www.doh.state.fl.us/mqa/Exam/spectest.htm>.

Department of Environmental Protection

The Department of Environmental Protection (DEP) provides reasonable and appropriate accommodations for individuals with documented disabilities, as defined by the ADA and accompanying regulations, who demonstrate a need for accommodations. The purpose of the documentation is to validate that the individual is covered under the ADA as an individual with a disability. The accommodations provided candidates with disabilities are based on the identified functional limitation. Documentation provided must provide a clear rationale for the identified functional impairment.

Specific accommodations are provided on an individual basis. Examples of accommodations include extended testing time, extra or extended breaks, large print examination, and readers. If the applicant needs accommodations, the applicant must indicate this in the space provided on the application for examination. Once an application for examination is received, each applicant that has indicated the need for special testing accommodations will be contacted directly by DEP program staff to discuss and clarify the request and associated requirements needed to grant the request.

For further information, applicants may contact the Operator Certification Program Office, telephone: (850) 245-7500. Information is also available at the following website: <http://www.dep.state.fl.us/water/wff/ocp/>.

Implications and Guidelines

It is important for counselors, student support personnel, and teachers whose programs require certification and/or licensure examinations, to be knowledgeable about the availability of special testing. Staff should ensure that students with disabilities who require accommodations during the instructional process know how to request testing accommodations from the Department of Business and Professional Regulation, Department of Health, Department of Environmental Protection, or other appropriate testing agency. Students should be encouraged to request appropriate accommodations so that test results accurately reflect their knowledge and skills.

Examination Requirements for Industry Certification

Background

Certain industries provide opportunities for employees or prospective employees to complete a test to demonstrate competency and proficiency to earn an industry certification for entering or advancing in the workforce (i.e., information technologies, construction, and manufacturing trades). Several companies (e.g., APPLE, CISCO,

Microsoft, NCCER, NIASE) are responsible for testing (either directly or through contracted services) and certification/licensure. Administering agencies are required to establish a process for providing accommodations to meet the requirements of the ADA and Section 504 of the Rehabilitation Act of 1973 as amended. The process includes guidelines for advertising the availability of testing accommodations as well as clarifying the procedure for the individual to request such accommodations.

It is important that individuals seeking industry certification who have a disability and need test accommodations review information posted on industry Websites and contact the appropriate administering agency for further details.

Implications and Guidelines

It is important for industry representatives, employers, and teachers to be knowledgeable about the availability of testing accommodations. Individuals with disabilities seeking industry certification should be encouraged to request appropriate accommodations (if needed) so that test results accurately reflect their competencies/proficiencies in their chosen field.

Summary

The Division of Career and Adult Education is committed to ensuring equal access and increasing opportunities for individuals with disabilities throughout the career preparation process. It is crucial that appropriate staff work collaboratively to develop and disseminate policy at the local level to ensure access and accommodations for students with disabilities. Detailed information and counseling should be provided so that students clearly understand their rights and responsibilities in all education matters, including assessment/testing. The goal is an assessment process that documents students' knowledge and skills and not the extent of disability and does not discriminate based on disability. This contributes to ensuring a well-qualified, diverse workforce in Florida.