



# ASSISTIVE TECHNOLOGY ACT PROGRAMS

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Cornelia S. Orr  
Executive Director  
National Assessment Governing Board  
800 North Capitol Street  
Washington, DC 20001

Dear Ms. Orr:

On behalf of the Association of Assistive Technology Act Programs (ATAP), we appreciate the invitation to provide comments on the expert panel recommendations regarding the inclusion of students with disabilities in the National Assessment of Educational Practice (NAEP). ATAP is a national, member-based organization, comprised of state Assistive Technology Act Programs funded under the Assistive Technology Act of 1998, as amended (P.L. 108-364). Collectively, the network of 56 state assistive technology (AT) programs provide access to and acquisition of assistive technology for individuals of all ages, with all types of disabilities. State AT Programs are actively engaged in assisting state and local education agencies access and utilize assistive technology to improve academic achievement of students with disabilities.

Overall, ATAP supports the recommendations of the expert panel with regard to maximizing the participation of students with disabilities. However, we share the position of other education and disability advocacy organizations that students with disabilities should be able to use any and all accommodations as specified in their IEP. We also encourage the National Assessment Governing Board (NAGB) to consider developments relative to universal design for learning and the increasing use of accessible information technology and assistive technology within the educational environment and ensure that assessment practices build upon these accepted and valuable tools and methods.

In the Report to the National Assessment Governing Board (NAGB) the panel identifies appropriate accommodations as those that do not alter the construct being measured and specifically recommends against the use of any change that would alter the construct NAEP is designed to measure. The report goes on to describe two specific accommodations as follows:

The panel reaffirms the current NAEP practice of not allowing “read aloud” as an accommodation on the reading test.

The panel reaffirms current NAEP practice of not allowing the use of calculators on those parts of the NAEP math test that assess computation.

Since access to accommodations is critical to equitable participation of students with disabilities, ATAP suggests the following further elucidation be provided to ensure consistent understanding of when accommodations are and are not allowable in the NAEP.

1. Text-to-speech assistive technology or human oral “reading aloud” accommodations should be allowed for non-reading tests, such as history, science, civics, economics, geography, math, etc. In addition, consideration should be given to allowing this accommodation for any portions of the reading test that could be “read aloud” without invalidating the reading construct assessed. This would include allowing “reading aloud” test questions (but not the test passage) and proper nouns. Research supports use of accommodations in this limited manner without invalidating the test construct assessed.
2. Assistive technology frequently used to support writing, such as portable word processors, should be allowed for non-writing tests, such as history, science, civics, economics, geography, math, etc. In addition, consideration should be given to allowing such writing supports to be used for the writing test to the extent it can be done without invalidating the constructs of the test.
3. All accommodation rules should apply consistently to all students with disabilities. There should not be any difference in what is allowed or disallowed based on type of disability.

Currently each state establishes a set of “allowable” accommodations that can be used on their own state assessments without invalidating the resultant student scores. The achievement results from these state assessments are used to comply with the requirements of No Child Left Behind and additional state-specific accountability mandates. Unfortunately, there is no consistency in current state policy regarding which accommodations are allowable without causing the student’s score to be excluded from the accountability measure.

In addition to the issues and recommendations outlined above, ATAP strongly urges the NAGB to consider treating the independent use of accessible information technology and assistive technology differently from other accommodations, especially those that involve human support. The Report to the National Assessment Governing Board (NAGB) includes a Decision Tree matrix with general benchmarks to determine how a student will participate in the NAEP. The determination is based upon a student’s 504 plan or IEP and the use of accommodations or modifications. With the move towards universally designed learning (UDL) environments, complemented by the availability of accessible information technology and assistive technologies, students with disabilities increasingly have access to a variety of flexible methods to acquire information and knowledge while demonstrating their abilities and achievements in the classroom. In today’s world, the use of technology for reading and writing support is commonplace for everyone – not just

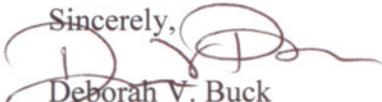
individuals with disabilities. As such, there is little justification for prohibiting the independent use of technology as an accommodation or taking the position that it invalidates the student's test score so long as the technology can be used by all students taking the assessment. At a secondary level, allowing independent use of technology would seem to be a more realistic reflection of knowledge and skills given the technology-rich environment in which students function today.

Based upon the evolving practices we have noted and the current inconsistencies in state policies regarding accommodations, it is critical that consistent guidance be provided regarding the use of accommodations for the NAEP. Guidance developed should address the ever expanding role of assistive technologies, accessible information technology and UDL within the NAEP construct as they can have far reaching effects upon assessment practices and test results across the board for students and educators. It is anticipated that clear guidance relative to policies and consistent practices for NAEP will translate into more consistent and evolving practices on a day-to-day basis in the classroom.

President Obama has stated that one of the guiding principles for our educational system is to provide a high-quality education for all children thereby enabling them to succeed in a global economy that is predicated on knowledge and innovation. As such, it is imperative that we acknowledge and embrace technology (universally designed and assistive technologies) in all aspects of our educational practices. The combination of progressive instructional practices and access to technology requires equally progressive assessment practices to ensure that the test results accurately reflect the accomplishments of students.

Thank you for this opportunity to submit comments on this important issue. We look forward to the positive outcomes that will accrue from the work of the expert panel.

Sincerely,



Deborah V. Buck  
Executive Director