

# P9 S9 C6 Reasonable Accommodation Policy



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## 1. PURPOSE AND POLICY CONSIDERATIONS

The Equal Status Acts, 2000 to 2004, require education and training establishments to provide reasonable accommodation to meet the needs of a service user (i.e. learner) who has a disability.

It is also important to distinguish between a Policy for Reasonable Accommodation and accommodating circumstances of temporary illness or personal circumstances. Where temporary illness or personal circumstances occur, which impede a learner's ability to participate in assessment tasks they should refer to the Policy and Procedures relating to Personal Extenuating and/or Mitigating Circumstances. Where accommodations are deemed reasonable, they will be provided by Forus Training and at no additional cost to the learner.

With respect to assessment, procedural responses to reasonable accommodation adhering to the principle of adaptation rather than dilution of assessment criteria; ensuring that those who do not receive reasonable accommodation are not disadvantaged. Reasonable Accommodation is guided by QQI (2013) policy outlined as follows:

*“Some learners with disabilities may be unable to demonstrate their achievement of the intended learning outcomes through conventional assessment tasks. Reasonable accommodations will therefore need to be made to deal with issues that would otherwise prevent such learners from demonstrating their achievement.”*

Reasonable accommodations are concerned with adapting the assessment approach, not with diluting the standard of learning to be attained, interfering with it or amending the intended learning outcomes. Assessments which involve reasonable accommodations should be consistent with those which do not. Reasonable accommodations may apply to any assessment.

Reasonable accommodations are normally identified well in advance of the assessment event by a need's assessment process. The findings of this process should be communicated in writing to the Head of Certification which will in turn distribute the information (anonymised where required as required to trainers, assessors, the PDAC and RAP, as well as to the learner concerned.” (QQI, 2013)

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## 2. DEFINITIONS

Reasonable accommodation is defined by the Equal Status Act (2000-2015) as follows:

“A reasonable accommodation is any means of providing special treatment or facilities if, without such accommodations, it would be impossible or unduly difficult for the person to avail of the service provided by the educational establishment.”

The Irish Human Rights and Equality Commission (2019) provides the following definition: “...practical changes which service providers have to make so that people with disabilities can get and use all kinds of services on an equal basis with others. This includes services which are free of cost (for example, a public playground, or social welfare services), as well as services which you pay for.”

In essence Reasonable Accommodation refers to modifications to academic requirements made to ensure that requirements do not discriminate or have the effect of discriminating, on the basis of disability, or certificated additional learning needs against a qualified applicant or learner with a disability or certificated additional learning needs.

Additional definitions relevant to this policy are as follows:

**Readers:** A reader is a person provided to assist a learner with a disability by reading assessment questions aloud without suggesting the answer

**Writers/Scribes:** A writer is a person who will, on request, write the answers exactly as given or dictated by a learner

**Sign language interpreters:** Sign Language Interpreters must be qualified to interpret Sign or other similar types of language

## 3. SCOPE

This policy applies to learners with a disability or specific learning need who require reasonable accommodations to enable them to demonstrate their competence and to complete assessment tasks associated with programme and/learning outcomes on an equitable basis. Therefore, Forus Training actively seeks to develop and implement policies and procedures which promote both equality and equity. Learners, including potential students with recognised disadvantages or disabilities may be given special consideration during course delivery and assessment.

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## 4. POLICY STATEMENT

Forus Training is committed to the adaptation of assessment instruments and methodology so as to amend the aspects of the assessment technique or instrument which prevent a learner's participation in the assessment due to an evidenced disability.

Forus Training is committed to supporting learners with disabilities or specific learning needs as far as is reasonably practicable as outlined in the AHEAD Charter for Inclusive Teaching and Learning. AHEAD (Association for Higher Education Access and Disability) is a National Centre of expertise on Inclusive Educational Practice. As highlighted by AHEAD, the term Reasonable Accommodation is embedded in National and EU equality legislation and is the cornerstone of the UNCRPD on human rights.

The issue of reasonable accommodation in assessment is an element which needs to be considered within the overall context of catering for learners with disabilities including access to programmes;

1. The provision of needs assessments for learners;
2. Reasonable accommodations within programmes;
3. Reasonable accommodations in assessment.

It is the responsibility of the learner to draw such matters to the attention of Forus Training through any means they are most comfortable with.

## 5. PROCEDURES AND PRACTICES

**The Process:** The Course Advisor must coordinate and assess the application for Reasonable Accommodation. The Course Advisor must also inform the learner of the outcome of his/her application. If an application is successful, the Course Advisor must work with the trainer (and other relevant persons if required) to accommodate the learner, while strictly adhering to the assessment principles above and the standard of knowledge, skill and competence required for certification.

**The Trainer:** Once an application for Reasonable Accommodation is approved, the trainer together with the Course Advisor (and other relevant persons if required) are required to plan and implement an alternative/adapted assessment in order to accommodate the learner, while strictly adhering to the assessment principles above and to the standard of knowledge, skill and competence required for

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certification.

**The Learner:** The learner is required to inform Forus Training, by identifying themselves as a person with specific needs and requesting the provision of alternative assessments and/or other support services that best meet their needs, prior to the commencement of the course or (within four (4) weeks prior to the assessment event).

The learner's specific needs are discussed in the needs assessment meeting documented in the form P9 S12 Reasonable Accommodation in Assessment process. This may allow reasonable accommodation to be facilitated. This application must be in writing using the Reasonable Accommodation in Assessment Application Form.

**Temporary circumstances:** The learner is required to inform Forus Training by identifying themselves, due to temporary circumstances (e.g. temporary injury), a person requesting the provision of alternative/adapted assessments and/or other support services that best meet their needs as soon as possible. This may allow reasonable accommodation to be facilitated. This application must be in writing using the Reasonable Accommodation in Assessment Application Form.

Regardless of the circumstances pertaining to a learner applying for reasonable accommodation, the learner is required to submit relevant evidence/documentation, as requested.

## Adaptation of Assessment

Adaptations of assessment for a learner may be implemented by Forus Training without having to request permission from QQI. These adaptations may include the following and/or other reasonable adaptation:

- Adaptive equipment/software - use of Assistive Technology
- Additional rest periods during scheduled class time
- Participation of scribes/readers
- The use of sign language
- The support of practical assistants
- Additional time in examinations
- Modified presentation of assessments/examination papers e.g. enlargements,

The implementation of these adaptations will ensure that all learners are assessed on an equitable basis.

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Forus Training accepts responsibility for the implementation of reasonable accommodations and any associated costs incurred.

Forus Training practice the following principles when considering Reasonable Accommodation applications/requests from learners:

- Any adaptation of the assessment by the assessor should facilitate the learner to demonstrate their achievement of the standards without significantly altering the standard.
- The adaptation should seek to amend only the aspects of the assessment technique or instrument which prevent a learner's participation in the assessment.
- Special assessment arrangements/adaptations are not intended to and should not reduce the validity and reliability of the assessment or compromise the standard.
- It should be used where the particular assessment technique(s) or instruments disadvantages the learner in assessment.

Forus Training follows the guidelines detailed below when employing support of readers, scribes and technology. Forus Training has adapted these from the *Examination Arrangements for learners with Disabilities: A Guide for Institutions of Higher Education (AHEAD Education Press, Dublin 2) 05/13*.

## Individualisation

- As a general rule, an adaptation to the form of delivery, which makes learning possible, will also assist in making assessment possible.
- The learner is usually the best authority on what form of delivery is the most effective and the same method(s) may then be possible during any assessment.
- However, it is important that the standard of work required by the assessment is not compromised.
- Only the method(s) by which the learner demonstrates his/her attainment of the standard can be adjusted.

Forus Training appreciates that the use of additional provision may give rise to the need for extra assessment supervision personnel.

## Readers

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A reader is a person provided to assist a learner with a disability by reading assessment questions aloud without suggesting the answer. Upon request, the reader will read to the learner:

- a. The entire or any part of the assessment,
- b. Any part of the learner's answers (exactly, as they are 'spoken').

Readers are typically used by people with visual impairments, people who tire easily, people who have extreme muscle weakness, and people with learning difficulties.

Only one reader per learner is permissible and the assessment should take place in a separate room or area to where other learners are present.

## **A Reader must follow the standards as detailed below:**

- Must read accurately;
- Must only read the instructions of the question papers and questions but not explain or clarify;
- Must repeat instructions given on the question paper only when specifically requested to do so by the learner;
- Must abide by the regulations since failure to do so could lead to the disqualification of the learner;
- Must not advise the learner regarding which questions to do, when to move on to the next question; nor the order in which questions should be answered;
- May enable a visually impaired learner to identify diagrams, graphs and tables but must not give factual information nor offer any suggestions, other than that information which would be available on the paper for sighted learners;
- May read numbers printed in figures as words (e.g. 252 would be read as two hundred and fifty-two but at the point of reading the number it should also be pointed to on the paper). An exception would be when the question is asking for a number to be written in words (e.g. Write the number 3675 in words.);
- Must not decode symbols and unit abbreviations (e.g. 22 should not be read as two squared but the function simply pointed to by the reader since part of the assessment is recognising what the superscript 2 means). Similarly, if the symbol > is printed, it should not be read as 'greater than' but simply pointed to by the reader, or describe the symbol for someone who is visually impaired;

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- May read back, when requested, what has been written in the answer;
- May, if requested, give the spelling of a word which appears on the paper but otherwise spellings must not be given.

## Writers/Scribes

A writer or scribe, is a person who will, on request, write the answers exactly as given or dictated by a learner. A writer may also act as a reader and is often used in similar circumstances to a reader. As in the case of a reader, only one writer per learner is permissible and the assessment should take place in a separate room or area to where other learners are present.

### A Scribe must follow the standards as detailed below:

- Must write down or word process accurately what the learner has said, except in an examination requiring word processing, in which case, a scribe will not be permitted;
- Must draw or add to maps, diagrams and graphs strictly in accordance with the learner's instructions, unless the learner is taking a design paper, in which case a scribe will only be permitted to assist with written parts of the paper;
- Must abide by the regulations since failure to do so could lead to the disqualification of the learner;
- Must write or word-process a correction on a typescript or Braille sheet if requested to do so by the learner;
- Must immediately refer any problems in communication during the examination to the examination supervisor;
- Must not give factual help to the learner or indicate when the answer is complete;
- Must not advise the learner on which questions to do, when to move on to the next question, or on the order in which questions should be answered;
- Must not expect to write throughout the examination if supervised rest breaks have been permitted;
- May, at the learner's request, read back what has been recorded.

### Rest Breaks and Supervision:

- Rest breaks either inside or outside the assessment area should be allowed as is appropriate.

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- A rest break can be flexible according to individual needs, e.g. ten minutes every hour as opposed to one twenty minute period during a three-hour assessment.
- The time so used should not be deducted from the time allowed (where specified) to complete the assessment.
- Rest breaks should not exceed 20 minutes per examination.
- Sessions splitting the assessment into two or more sessions may be an appropriate alternative for some learners.
- Extra Time In the case of assessments that are based on an time, additional time of ten (10) minutes per hour, or part thereof, is allowed for learners with a visual impairment; for learners where a scribe has been sanctioned; or for learners who meet the eligibility criteria for the use of a recording device or a word processor but who are unable to make use of these aids under examination conditions.

## **The assistance of Sign language interpreters must follow the standards as detailed below:**

- Sign Language Interpreters must be qualified to interpret Sign or other similar types of language.
- Only one Sign Language Interpreter per learner should be used.
- The assessment for learners (usually those who are deaf or hard of hearing) should take place in a separate room or area.
- Such provision may give rise to the need for extra assessment supervision personnel.
- Similarly, some learners may prefer to sign their answers directly to video.
- A signed response should be transcribed to print by someone proficient in sign language.
- Any words or phrases re-interpreted for the learner should be underlined and noted in the question paper.

## **Overwriting must follow the standards as detailed below:**

- Overwriting involves rewriting a question on an examination paper in such a way as to make it as explicit as possible.
- Overwriting should be in pen on the answer paper.
- This is done by assessment supervision personnel in situ.
- Where extensive modifications are necessary, a separate sheet of paper with the questions written in full should be attached by staple to the original answer paper.
- Technical terminology should not be overwritten.



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- In case of doubt about technical terminology a subject matter expert can be consulted.
- Care must be taken to retain the original emphasis of the question.

## **The use of Computers/Assistive Technology:**

Forus Training recognises that the whole area of new technologies and access to information is rapidly changing. The opportunities for learners to demonstrate their abilities are increasing with the advent of assistive devices like the ‘true-type talking microphone’, a device which, with practice, can type onto a computer screen a person’s spoken word. Such technologies are also becoming more accessible in terms of general availability and price.

The use of computers by learners with disability may be necessary as their primary means of communication, e.g. for learners with physical impairments for whom writing is difficult, for learners with visual impairments or blindness, and for learners with learning disabilities such as dyslexia.

The definition of a ‘computer’ generally refers to hardware and/or software which facilitate/s effective communication for people for whom this may not otherwise be possible. It may be standard equipment e.g. the use of word processing software by someone with motor difficulties which impede handwriting, or may be specially adapted e.g. speech synthesisers and text enlargement software/hardware for people with visual impairments. Audio-recording assessment and responses are useful in some cases, e.g. visual impairment or motor difficulties.

It is the responsibility of Forus Training to supply the appropriate hardware/software. Where required, Forus Training supplies the assessment recording and a blank recording device/tape to learners at the same time as other learners.

In order to minimise disruption to learners, where voice-activated software is used, the person should either use headphones or complete their assessment in a separate room or area.

**The use of computers and/or Assistive Technology must follow the standards as detailed below:**

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- Must only be used by a learner who, as a result of an impairment, presents handwritten communication that is illegible, incomprehensible or produced at below average speed as evidenced by a diagnostic or medical report;
- Must have been cleared of any previously stored data, as must any portable storage medium used;
- Storage media such as memory sticks or discs must not be used by a learner, but can be used by an examinations officer to take the completed work to a printer;
- Must reflect the learner's normal method of producing written work except in cases where temporary injury gives rise to the need for a word processor;
- Must be in good working order at the time of the examination;
- Must either be connected to a printer so that an answer paper can be printed off or have the facility to print from a portable storage medium. This may be done after the examination is over, not in the extra time. The learner should be present to verify that the work printed is his or her own. Word processed answer paper must be attached to any answer book which contains some of the answers;
- Must be connected to mains electricity;
- Must be used to produce answer papers under secure conditions, otherwise they may be refused;
- Must not give the learner access to other applications such as calculators, spreadsheets etc. unless required as part of the examination.
- Must not include graphic packages or computer aided design software unless permission has been given to use these;
- Must not include voice-activated software unless the learner has permission to use a scribe or relevant software;
- Must not be used to perform skills which are not being assessed;
- Must not be connected to an Intra-/inter-net or any other means of communication.

**Braille:** *Braille-mate, Braille 'n speak, Braille 'n print,*

- Braille is generally, though not exclusively, used by learners who are blind or visually impaired.
- It is generally advised that the Braille machine is attached and adapted to a printer which will produce a printed text.

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- The responses of the learner should not be printed until after the end of the assessment time, as the noise levels may be too high for other learners.
- The assessment/training location should supply the printer, braille paper and/or the computer printout paper.
- The learner can read the assessment paper as well as his/her answers from a TV screen. The learner uses the base under the screen to write and this is simultaneously magnified on the screen.

## Enlarged print:

- Some learners, usually those with visual impairments, may simply require their assessment papers in enlarged print, i.e. A3 size paper.
- Some learners, especially those who have dyslexia, may require their assessment paper in a colour other than Black and white e.g. black on yellow, or black on grey.
- A gloss/high-sheen coated paper may also be unsuitable.
- The learners themselves should be consulted.

## Reading, Writing and Spelling Waiver

A waiver from the assessment of spelling, grammar and punctuation can be applied in support of learners where English may not be their first language, where the learner has a certified learning need such as dyslexia or any other learning need or disability as presented and evidenced by a learner. A learner with a disability who has a reading, writing or spelling difficulty can be disadvantaged when assessment takes the form of a written timed examination. Learner's written work may contain:

1. **Surface errors** in spelling and grammar such as inaccuracies in the use of tense, grammatical agreement, plurals, spelling and punctuation;
2. **Structural flaws** including weak sequencing of ideas, paragraphs, and sentences; unclear expression of cause and effect; lack of competence in using abstract language or lack of awareness of writing genre.

The following guidelines should be taken into consideration when marking the assessment script of a learner with a reading, writing or spelling difficulty:

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1. First, read the assessment script quickly to judge the learner’s underlying understanding of the topic; then assess their performance against the learning outcomes. If the script contains all the required elements but does not introduce them in a clear logical order, avoid penalising the learner for a lack of structure in their writing unless this is a stipulated competency being assessed.
2. Errors in spelling do not necessarily mean that the learner is confused about the meaning of the word or its function in their writing. Generally, such errors do not lead to ambiguity and should not be penalised when subject knowledge is being assessed.
3. Lexical errors, such as coarse for *course*, do not mean that the learner is confused about the meaning of the words. This kind of error should not be penalised unless it leads to ambiguity.
4. Grammatical errors, like incorrect tense endings, lack of subject – verb agreement and incorrect word order may not affect the meaning of the sentence.
5. Learners with difficulties in reading, writing and spelling might not always use punctuation as a tool to clarify meaning. Scripts may contain long sentences that are difficult to follow with indiscriminate punctuation or no punctuation at all. Very short sentences or fragments of sentences might also be produced.
6. Some learners may have restricted vocabulary and use a far more limited range of words that one would expect. Avoid penalising learners who may have an immature style of writing, unless written communication is a specified learning outcome.
7. Where grammar and spelling are core competencies of a course a learner’s work must be marked on the basis of accuracy in the language and therefore these marking guidelines will not apply.
8. In all subjects, if a learners’ errors make a material difference to the meaning of their work, it will not be possible to classify them as surface errors that do not incur penalty. For instance, if a nursing learner writes hypertension instead of hypotension, this will affect the mark awarded.
9. In all subjects, if the surface errors or structural flaws make the learner’s work so ambiguous that it is impossible to decipher the meaning, then this diminishes their ability to demonstrate the module’s learning outcomes and this would be reflected in the marks awarded.

## Separate Room

Many learners experience recognised mental health illness at the time of examinations such as stress, insomnia, and anxiety. Learners should be able to access a separate room from the examination hall/skills

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demonstration room, via extra time/space/supervision, to ensure that the learner is not disadvantaged by their mental health condition.

## 6. RELATED DOCUMENTS

### LEGISLATION / STANDARDS

Our guidelines have been adapted from Examination Arrangements for learners with Disabilities: A Guide for Institutions of Higher Education (AHEAD Education Press, Dublin 2) 05/137. Roles and responsibilities.

## 10. CONTACT INFORMATION

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