

CAST Comments to Smarter Balanced: Accessibility and Accommodations Guidelines

Submitted August 27, 2013

On Aug 14th, Smarter Balanced Assessment Consortium released their Accessibility and Accommodations Guidelines for public comment. Responses were requested via a computer survey consisting of seven questions with a focus on three categories of supports. Each designation included a listing of embedded (digital) and non-embedded (non-digital) supports with a description and in many cases recommendations for use.

Each section below contains the listing of specific supports that were provided in six tables and recommended by SBAC for each category. We have listed those supports by name as they appear in each table, followed by CAST comments regarding the specific support.

CAST publically wishes to thank Smarter Balanced Assessment Consortium for the opportunity to comment on the *Accessibility and Accommodations Guidelines*. We recognize the tremendous amount of coordination and effort that SBAC has accomplished to date in developing these guidelines, and we appreciate their willingness to engage in a dialogue on these issues.

Section 1: “Smarter Balanced Universal Tools”

Question 1: Comments on Table 1 (Suggested Rewording: “Embedded Universal Tools”)

- BREAKS: Specifics about breaks for students appear vague; consider clarifying the process.
- CALCULATOR: No changes. The final sentence regarding assistive technology is helpful.
- DIGITAL NOTEPAD: Where is the digital notepad located in the tool, and how does it function? Is the Notepad associated with specific items? Clarify use of the Notepad in relation to “segments” of the assessment. If the Notepad is available only until the end of the test segment, how does the Notepad function for areas of the test that are computer adaptive?
- ENGLISH DICTIONARY/ENGLISH GLOSSARY: Dictionary and Glossary as described—no concerns. See general comments regarding navigation, additional time, and accessibility for these functions.
- EXPANDABLE PASSAGES: Concern that when components (e.g., passages, images) are expanded they may cover important stimuli/input from remaining screen view.

- HIGHLIGHTER: Clarify use of highlighter; does highlighting persist only within test “segments”?
- MARK FOR REVIEW: If the assessment is truly adaptive, is review only possible within a segment that is to be delivered to the student? Description indicates that return is possible within an “assessment” rather than a “segment.”
- MATH TOOLS: See general comments below regarding need for students to practice tool functionality prior to taking the assessment.
- SPELL-CHECK: Clarify meaning of “performance task full writes.” We understand availability in areas where Spelling is not construct relevant.
- STRIKETHROUGH: We support availability of this functionality; no recommended changes. See general comments regarding feature practice prior to exam.
- TAB-ENTER NAVIGATION: Clarification request—is this feature specific to text? Reference in description is to “text,” but TAB-ENTER functionality should be available for all elements in the active assessment window: buttons, links, tabs, text boxes, etc. Why is navigation limited to TAB-ENTER? There are additional and essential navigation functionality needed for most users beyond TAB-ENTER. Consider additional options.
- WRITING TOOLS: We support availability of this functionality; no recommended changes. See general comments regarding feature practice prior to exam.
- ZOOM: Concern that students will get lost navigating a zoomed screen to read/find other aspects/information on the screen to support generating a response. Is there capability to move the zoomed screen to view other content? See general comment regarding feature practice prior to exam.

Question 2: Comments on Table 2 (Suggested Rewording: “Non-Embedded Universal Tools”)

- BREAKS: Specifics about breaks for students appear vague; consider clarifying process. Clarify difference between breaks that are embedded in the assessment and those that are not embedded.
- ENGLISH DISCTIONARY: We support availability of the Dictionary and Glossary as described; no concerns. See general comments regarding additional time. Clarify the structure and meaning of “full writes”; is there a planning or drafting component? If so, would these supports be available for drafting?
- PROTRACTOR: No recommended changes. See general comments regarding confusion over use of non-embedded tools.

- RULER: No recommended changes. See general comments regarding confusion over use of non-embedded tools.
- SCRATCH PAPER: Clarify whether this non-embedded tool is available only for those students using the digital assessment environment. We assume that the student’s preferred and/or necessary method for recording notes outside of the assessment environment will be allowed. Are students allowed to use their own AT devices as “scratch paper” for notes etc.?
- THESAURUS: No recommended changes. See general comments regarding confusion over use of non-embedded tools and availability of additional time for the student.

Section II: “Smarter Balanced Designated Supports”

Question 3: Table 3 (Suggested Rewording “Embedded Designated Supports”)

- COLOR CONTRAST: No recommended changes. This support should be used and practiced prior to assessment.
- COLOR OVERLAYS: No recommended changes. This support should be used and practiced prior to assessment.
- MAGNIFICATION: See general comment regarding feature practice prior to exam.
- MASKING: No recommended changes. This support should be used and practiced prior to assessment.
- TEXT-TO-SPEECH (not for ELA Reading Passages): Users familiar with screen reader or TTS tools will expect controls that allow not only being able to control speed but also being able to step back (repeat) and jump ahead. Clarification requested. This support should be used and practiced prior to assessment.
- TRANSLATIONS (Glossary): Clarification requested for users of TTS who use translations. Will they be able to proceed from point of translation, or will the TTS automatically go back to the beginning? We also wonder why this tool is not included under the Universal Tools section.
- TURN OFF UNIVERSAL TOOLS: Make it clearer in the wording that this is a one-by-one turn off or on. Suggest rewording the feature as follows: “Selectively turn off Universal Tools” (See note in general comments regarding same change in Figure 1).

Question 4: Table 4 (Suggested Rewording “Non-Embedded Designated Supports”)

- COLOR CONTRAST: No recommended changes. This support should be used and practiced prior to assessment. See general comments regarding confusion over use of non-embedded supports.

- COLOR OVERLAYS: No recommended changes. This support should be used and practiced prior to assessment. See general comments regarding confusion over use of non-embedded supports.
- SCRIBE: Recommend standard procedures for human scribes; specifically regarding mechanics and spelling. The term verbatim is unclear—e.g., will scribes record umm and aah?
- SEPARATE SETTING: No recommended changes.
- TRANSLATIONS (Glossaries): No recommended changes.

Section III: “Documented Accommodations”

Question 5: Table 5 (Suggested Rewording “Embedded Documented Supports”)

- AMERICAN SIGN LANGUAGE: This accommodation should be used and practiced prior to assessment. Where there is not a violation of construct, this support should be available.
- BRAILLE: No recommended changes. NOTE: It is unlikely that full page tactile graphics can be embedded within the supports. This will have to be supplied on paper and thus non-embedded. Refreshable lines of braille can be embedded, whereas full page tactile graphics cannot.
- CLOSED CAPTIONING: Recommend controls that allow the user to take the time needed to read the captions prior to moving to the next. Reading level and rate will be an issue for some.
- SPEECH-TO-TEXT: Concern about reliability of Speech-to-text with younger students and adolescent boys. Awareness issue. The final sentence regarding use of AT devices is helpful. Students who use Speech-to-Text for writing should have access to TTS for review purposes. Speech to text supports should include TTS so that students have the opportunity to review what they’ve composed in their preferred medium.
- TEXT-TO-SPEECH (for ELA Reading Passages): We support Option 3 on p. 18
 - (1) We do not agree that limitations for use of this accommodation should be based solely on grade level. Rather, decisions should be based on the intended construct for each item, regardless of the type of disability or grade level.
 - (2) We are concerned about the impact on instruction of limiting the use of the TTS accommodation for assessment. Those using TTS in instruction should be able to use this accommodation during an assessment as long as it does not affect the construct being measured.
 - (3) Regarding access: (a) users familiar with screen reader or TTS tools will expect controls that allow not only being able to control speed but also being able to step

back (repeat) and jump ahead. This support should be used and practiced prior to assessment; (b) Speech rate for TTS supports is said to be adjustable. Such adjustments should be “on demand” as in JAWS screen reader rather than a preset rate; (c) Where read aloud supports for blind and visually impaired students are allowed, these should be operable with braille or print displayed simultaneously.

- TRANSLATIONS (Stacked): No recommended changes. This accommodation should be used and practiced prior to assessment.

Question 6: Table 6 (Suggested Rewording “Non-Embedded Documented Accommodations”)

- ABACUS: No recommended changes. This accommodation should be used and practiced prior to assessment.
- ALTERNATE RESPONSE OPTIONS: No recommended changes. This accommodation should be used and practiced prior to assessment.
- BILINGUAL DICTIONARY: We support this accommodation. We recommend consideration of Bilingual Dictionary as a Universal Tool. ELLs without documented disabilities exit bilingual and ESL programs with conversational English, not academic English fluency—they still need supports. ELLs with and without disabilities will need additional time, regardless of the types of supports they might have access to or those provided.
- CALCULATOR: No recommended changes. This accommodation should be used and practiced prior to assessment.
- MULTIPLICATION TABLE: No recommended changes. This accommodation should be used and practiced prior to assessment.
- PRINT ON DEMAND: No recommended changes. This accommodation should be used and practiced prior to assessment.

Section IV: Smarter Balanced Accommodations Categories and Overall Comments

- For the Options under consideration for Embedded Documented Accommodations (pages 17–18), we support the following:
 - Option 1 for ASL for Listening Items, Closed Captioning for Listening Items, and Speech-to-Text/Dictation for Writing Items.
 - However, we prefer Option 3 for Text-to-Speech for reading passages.
- It is difficult for us to respond to some of the features discussed without seeing examples of the specific construct being measured at the item level.
- CAST, in conversation with SBAC, recommends changing the names/titles for the three categories of supports to the following: Universal Tools, Designated Supports, and

Documented Accommodations. Use of the words “accessibility” and “accommodations” inappropriately suggests that these features will be given only to students with disabilities. These terms also have particular legal implications for students with disabilities. Figure 1 should be updated to reflect the new table names. NOTE: Figure 1 should also be updated to reflect the phrase: “Selectively Turn off Universal Tools.”

- There is lack of clarity in the use of language about assessment components throughout the guidelines—for example, the terms sessions, segments, and sections are used interchangeably.
 - All materials used or developed in a “segment” should persist anytime the student is able to RETURN to that “segment” to complete, review, or possibly modify the “segment.” Anything the student does to enhance working memory should be available throughout the access period within a “segment.”
 - How do the terms used in this SBAC guidelines document relate to the term “testlet,” as described in previous literature on computer adaptive testing (CAT)? See Folk, V. G. & Smith, R. L. (2002). Models for delivery of CBTs. In C. Mills, M. Potenza, J. Fremer, & W. Ward (Eds.). *Computer-based testing: Building the foundation for future assessments* (pp. 41–66). Mahwah NJ: Lawrence Erlbaum,
 - We recommend the use of a progression bar as an indicator of where the student *is* in a “segment” and how many items there *are* in a “segment.” See Folk and Smith, 2002.
- All features need to be taught and practiced prior to the use of these tools during assessment. Ideally, these tools should be available to all students during instruction as well as assessment. Additionally, feature instruction should be made an essential component of training for teachers/administrators prior to assessment administration.
- It is important to ensure that switch navigation is available throughout the entire assessment.
- Monitor or screen size preference should be stipulated in student profiles (ISAAP) for students with visual impairments. Should LEAs administer assessments utilizing 15" laptop computers, for example, screen magnification would drastically reduce the scope of information presented in the screen’s magnification window, whether in lens or full screen view. The solution during instruction and assessment is for the ISAAP to take into consideration the student’s need for large screen displays (e.g., 27").
- A number of the features refer to the need for additional time, including several features included under Universal Tools. It is unclear how a tool available to all students will be monitored by an adult to allow additional time. If adult decision-making is required, why are these features not included under designated supports? It is also difficult to make judgments about appropriate time extensions without information regarding overall time constraints of the various assessment “segments.”
- Clarification is needed regarding decisions for use of a non-digital delivery assessment and applications of varied accessibility features. Will guidelines be made available? Do

non-embedded supports refer to all non-digital supports? Are non-embedded supports available to students using both the digital assessment and paper and pencil format?

- We understand why SBAC has decided not to specify a particular decision-making process for the use of designated supports. We continue to have concerns, however, that such a vague and inconsistent process will invite the possibility of bias and subjectivity to impact decisions about the use of particular features by certain students, in particular students without disabilities who are not protected under IDEA or Section 504.
- It is difficult to anticipate how these tools and accommodations are going to affect the assessment results. Will data be collected on tool use and accommodations to inform future development and administration of these assessments?

Thank you for the opportunity to comment on the work of SBAC,

Yvel Crevoceur, PhD, UDL Postdoctoral Fellow

Tracey E. Hall, PhD, Senior Research Scientist

Chuck Hitchcock, MEd, Chief Officer, Policy and Technology

Richard Jackson, EdD, Research Scientist/Professor, Boston College

Joanne Karger, JD, EdD, Research Scientist/Policy Analyst

David H. Rose, EdD, Chief Education Officer and Founder

Skip Stahl, MS, Senior Policy Analyst

Joy Zabala, EdD, Director of Technical Assistance, CAST and AIM Center