

STORIES FROM THE TESTING ROOM

**High School Equivalency Exams:
Accessibility of Accommodations for Persons with Learning Disabilities**

**A Report Prepared for the
Learning Disabilities Association of America
Board of Directors**

By

**A Subcommittee of LDA members who serve on the
Adult Topics and Public Policy Committees**

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STORIES FROM THE TESTING ROOM**High School Equivalency Exams:
Accessibility of Accommodations for Persons with Learning Disabilities¹****February 2016****Introduction**

The Learning Disabilities Association of America (“LDA”) was approached in the fall of 2014 with concerns regarding the ability of individuals with learning disabilities to be approved for, and to use, accommodations when taking high school equivalency exams. The Board of Directors of the LDA considered this important matter at its September 26, 2014 Board Meeting, and then charged a Subcommittee to research it.

The primary purpose of this report (the “High School Equivalency Exam Report” or “HSEE Report”) is to share how the “end users” - the test applicants with learning disabilities, adult education professionals, and evaluators - perceive the process of applying for accommodations on high school equivalency exams. The HSEE Report is not an attempt to present a scientific or statistical study on accommodations on the high school equivalency exams. Rather, the Subcommittee heard from real people on their experiences, and wants to share how the process impacts them.²

The HSEE Report first provides a brief outline of the current law on testing accommodations and “high stakes” tests. Then it provides information on a recent report prepared for the U.S. Department of Labor on high school equivalency exams. And, lastly the HSEE Report presents a description of the process of applying for accommodations as seen from the point-of-view of test applicants with a learning disability, and the adult education professionals and evaluators who work with them.

As part of exploring this point-of-view, the Subcommittee wanted to learn first-hand from individuals with learning disabilities, adult education professionals and evaluators their experiences obtaining and using accommodations on high school equivalency exams. Thus, the Subcommittee sent a questionnaire on December 21, 2014 to LDA’s entire list of email addresses (the “Questionnaire”) (See Appendix, Item 1). The Questionnaire was also sent on January 28, 2015 to the email addresses of all the State Directors of Adult Education. Individuals who responded to the Questionnaire were then contacted by members of the Subcommittee and asked if they would share their experiences and full documentation with the Subcommittee.

The documentation was then sent for review by two outside consulting psychologists who are professionals with expertise relating to learning disability evaluations and thus Qualified Professionals (see footnote 3). A copy of the Review of Documentation Form used by these Qualified Professionals is provided in the Appendix, Item 2. For confidentiality, the test applicants’ documentation is not included with the HSEE Report, however a summary of each test applicant’s experience is provided in the

¹ This Report has been prepared by a LDA Subcommittee comprised of members of the LDA and includes members of the Adult Topics Committee and Public Policy Committee: JoAnna J. Barnes (Chair), Eun Mi Cho, Julia Frost and Patti White.

² Throughout the HSEE Report those who apply to take a HSEE are referred to as “test applicants,” “test takers,” and “examinees.” Additionally, the HSEE is referred to as both an “exam” and “test.” The authors of the HSEE Report attempted to be consistent, however the Testing Entities use all these terms and it seemed best for clarity to follow their lead in places.

Appendix, Item 3. Specific individuals whose experiences seeking testing accommodations are discussed in this Report are referred to as a “Test Applicant.”

One of LDA’s missions is to create opportunities for success for all individuals affected by learning disabilities. The Subcommittee members believe working to assure all test applicants with learning disabilities obtain the accommodations allowed by law supports this mission.

STORIES FROM THE TESTING ROOM

RECOMMENDATIONS

Based on the stories from test applicants, adult education professionals, and evaluators regarding the process for applying for test accommodations on the high school equivalency exams, and the experiences of members of Subcommittee who first-hand walked through the application process, the members of the Subcommittee believe some of the current practices and procedures create barriers that individuals with learning disabilities must overcome in order to achieve a high school equivalency certification.

The members of the Subcommittee recommend that the following changes be implemented by the Testing Entities. Implementation of these changes will create opportunities for success for all individuals affected by learning disabilities. Additionally, the implementation of some of these recommended changes will bring the current practices of the Testing Entities in line with the current law on test accommodations.

The Most Important Recommendations

1. When a Testing Entity "... receive[s] documentation provided by a qualified professional who has made an individualized assessment of an applicant that supports the need for the modification, accommodation, or aid requested," then the Testing Entity should "generally accept such documentation and provide the accommodation" requested without further documentation. [28 CFR Pt. 36, App A, Ch 1, p. 784 (7-1-12 Edition)]

The Testing Entities (1) should accept, without requiring further testing, the diagnosis of a Qualified Professional³ as long as the diagnosis is specific, and (2) should approve accommodation needs recommended by a Qualified Professional that are based upon the evaluation results.

The Testing Entities should eliminate any finite list of acceptable assessments because a Qualified Professional is in the best position to determine which assessments are appropriate, and the Testing Entities should stop requiring the restatement of the scores for the assessments administered because these will already be in the Qualified Professional's Evaluation Report.

Additionally, the Testing Entities should remove from the accommodations request forms any language advising an evaluator that extended time may not be an appropriate accommodation.

The Testing Entities should eliminate any requirement that the evaluator must provide extensive documentation of his or her professional credentials because it is sufficient for a Qualified Professional to establish his or her professional credentials by providing information about licensure or certification, education, and area of specialization.

2. When evaluating a request for accommodations, the Testing Entities should consider the cumulative impact of multiple disabilities on testing.

³ The term "Qualified Professional" is never specifically defined in the federal laws or regulations, however in its comments accompanying the published regulation the Department of Justice refers to "a professional with expertise relating to the disability in question" as the person qualified to make an individual assessment. 28 CFR Pt. 36, App A, Ch 1, p. 785 (7-1-12 Edition)

3. For test applicants whose documentation establishes that they previously were approved to receive testing accommodations on another standardized examination (such as the SAT or ACT), and with respect to the testing accommodations for which they were previously approved, the Testing Entities shall require no more documentation than proof of the approval for such testing accommodations and certification by the test applicant that he or she is still experiencing the functional limitations caused by the disability(ies) for which testing accommodations were approved.

Similarly, the Testing Entities should accept a “certification of eligibility” based on the test applicant’s history of receiving test accommodations if a student (1) was enrolled in a special education program or had 504 Plan in a K-12 school in the past five years, or (2) had accommodations at a community college in the past five (5) years. (A Certification of Eligibility is more fully discussed in this Report at page 44.)

In all cases, even if more than five (5) years old, the Testing Entities should include the most recent IEP or 504 Plan, no matter its currency, as an option in the list of documentation that may be submitted with the application for test accommodations. The IEP and 504 Plan should be given considerable weight in making a decision on whether to approve test accommodations.

4. The Testing Entities should provide a process for test applicants with learning disabilities or ADHD to provide a “documentation update” instead of requiring a new comprehensive psychoeducational report, and not require a new intellectual functioning test if a valid one was conducted in testing covered by the initial report.

Recommendations Concerning the Application Process

5. The Testing Entities should have an accessible website that includes on the Testing Entity’s homepage with a clear link to the accommodations request information, including a direct toll-free phone number and email contact information for accommodations questions, as well as keeping the Q/A section.

6. The Testing Entities should have one accommodations request form regardless of disability type.

7. The Testing Entities should provide an accommodations list that describes testing accommodations that may be approved. It should be clear that the list is not exhaustive.

8. The Testing Entities on the accommodations request form should clearly set out the information for the 3rd party authorization, with a clear release for the test applicant to sign. (Suggested language is provided in this Report at page 43.)

9. The Testing Entities should include a “Personal Statement” of the test applicant as an option in the list of documentation that may be submitted with the application for test accommodations. This Personal Statement should be given considerable weight in making a decision on whether to approve test accommodations or not.

10. The Testing Entities should include a “Letter from Rehab Counselor or Case Manager,” also called an “Advocate’s Statement,” as an option in the list of documentation that may be submitted with the application for test accommodations. This Advocate’s Statement should be given considerable weight in making a decision on whether to approve test accommodations.

11. The Testing Entities should permit the application for accommodations, indeed all communication, to be submitted by fax, mail or email.

12. The Testing Entities should send confirmation of receipt by the Testing Entity of the test accommodations request application.
13. The Testing Entities should respond to all accommodations requests in a timely manner (within 30 calendar days or less).

Recommendations Concerning Available Accommodations

14. The Testing Entities should make available the alternate formats large print and Braille to any test-taker without formal approval—these should not be considered testing accommodations.
15. The Testing Entities should allow a test applicant to use the assistive technology with which he or she is most familiar. For example, a visually-impaired text applicant may be most familiar with certain text-enlarging software, but not a magnifier. That test applicant should be allowed to use the software and not be required to use the magnifier.
16. The Testing Entities should allow a reader and text-to-speech as regularly provided accommodations to those test applicants with a reading disability, and give the test applicant the right to choose which format and the right to have a reader with whom he is familiar.

Other Recommendations

17. The Testing Entities should provide a “comfort list,” and make it easy to find on the website⁴.
18. The Testing Entities should make available practice tests with accommodations to a test-taker, even if that test-taker has not yet been formally approved for accommodations. The format of the practice test (paper-based or computer-based) should match the format of the test the student anticipates taking.

Paper-Based Format

Although this topic is not within the scope of the HSEE Report and applies to all test-takers not just those with disabilities, the Subcommittee believes it must be mentioned because the topic was so regularly raised by those interviewed.

Many adult education experts have concerns about the limitations placed on access to the paper-based platform because many adults who take high school equivalency exams do not have regular access to a computer and the internet, and so are not fluent on a keyboard or computer. This is especially a concern in rural areas where internet access may be very limited. (McGraw, Daniel, “Nearly 500,000 Fewer Americans Will Pass the GED in 2014 After a Major Overhaul to the Test. Why? And Who’s Left Behind,” Cleveland Magazine, December 17, 2014. <http://www.clevescene.com/cleveland/after-a-major-overhaul-to-the-ged-test-in-2014-18000-fewer-ohioans-will-pass-the-exam-this-year-than-last-along-with-nearly-500000-across/Content?oid=4442224>)

Many adult education professionals expressed their opinion that if the purpose of the test is to assess a test-taker’s knowledge of material, then the test should be delivered in the format that best ensures, whether or not disabled, the test-taker’s achievement level on the content, not reflect his or her

⁴ The “comfort list” includes supports permitted by a testing entity to all test takers, even those without a documented disability. These include things such as ear plugs, prescription medication, service animals and highlighters.

lack of fluency on a computer. Thus every test applicant should be able to choose whether to take the test on a computer-based or paper-based format.

STORIES FROM THE TESTING ROOM**CURRENT LAW ON TESTING ACCOMMODATIONS**⁵

The law requiring testing accommodations is found in Section 309 of the Americans with Disabilities Act of 1990, as amended (P.L. 110-325). This provides,

“Examinations and courses. Any person that offers examinations or courses related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes shall offer such examinations or courses in a place and manner accessible to persons with disabilities or offer alternative accessible arrangements for such individuals.”

(42 U.S.C. §12189, Chapter 126, Subchapter III – Public Accommodations & Services Operated by Private Entities [Title III])

The current regulations and court cases on testing accommodations for individuals with disabilities provide guidelines on what standards are to be applied when a test applicant requests accommodations on a test.

Generally, these standards are as follows:

1. Examinations must be administered as to **best ensure** that the examination results accurately reflect the individual’s aptitude or achievement level.

2. Examinations must be offered at an equally convenient location and a timely manner (as to the non-disabled).

3. Any requests for documentation of a disability and need for accommodations must be reasonable and limited to the need for accommodations.

4. Considerable weight must be given to documentation of past accommodations, especially IEP’s and 504 Plans.

5. The testing entities response to a request for accommodations must be timely.

28 CFR §36-309(a)

These standards are specifically set out in the regulations for the Americans with Disabilities Amendments Act of 2008, and the accompanying Department of Justice section-by-section analysis. (Applicable sections of the law, regulations, and analysis are provided in Appendix, Item 4.)

The Department of Justice and Court Decisions on Testing Accommodations

The Department of Justice, by its attorneys in the Disability Rights Section, Civil Rights Division, has supported these standards through enforcement actions under the ADA . Most recently, in

⁵ On an editorial note, throughout this report underlining and text bold have been employed to highlight certain language. The purpose is to aid the reader in locating important points or issues raised. Also, throughout the report the masculine pronoun has been used; again this is to aid the reader by not adding unnecessary verbiage.

May 2014 the United States of America entered into a Consent Decree with the Law School Admission Council, Inc. (“LSAC”), on its policies and practices concerning testing accommodations for students with disabilities (the “Consent Decree”). As part of the Consent Decree, the LSAC agreed to pay \$7,675,000 in compensatory damages and a Panel of Experts was established to decide what are the “best practices” for the LSAC to employ in order to comply with current law and regulations. (http://www.ada.gov/dfeh_v_lsac/lsac_consentdecree.htm)

The LSAC challenged the Panel of Experts’ Report on best practices and appealed to the U.S. District Court, Northern District of California. On August 7, 2015, the Court granted part of the LSAC appeal, but left in place the vast majority of the Panel’s Report (“LSAC Appeal”). (<http://www.dfeh.ca.gov/res/docs/Fahizah/SperoLSACOrder20150807.pdf>)

Prior to the LSAC case, in February 2011, the Department of Justice entered into a Settlement Agreement with the National Board of Medical Examiners. This agreement supports Justice’s position that testing accommodations can be required in order for the test-taker to demonstrate his or her ability and achievement level. It also supports the position that even if a learning disability is not diagnosed for the first time until later in life, this should not preclude someone from seeking, and obtaining approval for, test accommodations (<http://www.ada.gov/nbme.htm>).

The Ninth Circuit has supported these standards as well. In Enyart v. National Conference of Bar Examiners, 630 F. 3d 1153, (9th Cir 2011), the court

“rejected the argument that Section 309 [of the ADA statute] requires only ‘reasonable accommodations’ and adopted the ‘best ensure’ standard for determining accessibility that Justice included in its regulations. The court found that the requirement in Section 309, that testing entities offer examinations in a manner accessible to individuals with disabilities, was ambiguous. **As a result, it deferred to the requirement in Justice’s regulations providing that testing entities must offer examinations ‘so as to best ensure’ that the exam results accurately reflect the test takers aptitude rather than the disabilities.** Applying that standard, the court found the NCBE was required to provide Enyart, a blind law school graduate, with the accommodations she had requested rather than the ones offered by NCBE based on evidence that her requested accommodations were necessary to make the test accessible to her given her specific impairment and the specific nature of the exam.” (Emphasis added.)

(United States Government Accountability Office, “Higher Education and Disability: Improved Federal Enforcement Needed to Better Protect Students’ Rights to Testing Accommodations,” November 2011, p. 7. High School Equivalency Tests were not addressed in GAO report.) (<http://gao.gov/assets/590/587367.pdf>)

Additionally, the Department of Justice, Civil Rights Division, Disability Rights Section put forth ADA Technical Assistance Publications regarding the regulations. In a September 2015 publication entitled “Testing Accommodations,” Justice specifically included high school credential examinations as a covered test for purposes of accommodation “by private, state or local government entities.

“This publication provides technical assistance on testing accommodations for individuals with disabilities who take standardized exams and other high-stakes tests. It addresses the obligations of testing entities, which include private, state, or local government entities that offer exams related to applications, licensing, certification, or credentialing for secondary (high school), postsecondary (college and graduate school),

professional (law, medicine, etc.), or trade (cosmetology, electrician, etc.) purposes. Who is entitled to testing accommodations, what types of testing accommodations must be provided, and what documentation may be required of the person requesting testing accommodations are also discussed.” (p. 1)

http://www.ada.gov/regs2014/testing_accommodations.html

A copy of this publication is attached in the Appendix, Item 5.

The Department of Justice and Documentation & Recommendations from a Qualified Professional

The Department of Justice in its comments to the regulations is clear that testing entities should accept documentation and recommendations from a Qualified Professional to demonstrate an individual has a disability and requires the requested accommodation:

It remains the Department's view that, when testing entities receive documentation provided by a qualified professional who has made an individualized assessment of an applicant that supports the need for the modification, accommodation, or aid requested, they shall generally accept such documentation and provide the accommodation. (Emphasis added.)

... The Department believes that appropriate documentation may vary depending on the nature of the disability and the specific modification or aid requested, and accordingly, testing entities should consider a variety of types of information submitted. Examples of types of information to consider include recommendations of qualified professionals familiar with the individual, results of psycho-educational or other professional evaluations, an applicant's history of diagnosis, participation in a special education program, observations by educators, or the applicant's past use of testing accommodations. **If an applicant has been granted accommodations post-high school by a standardized testing agency, there is no need for reassessment for a subsequent examination.**

... No one piece of evidence may be dispositive in make [sic] a testing accommodation determination. The significance of a letter or other communication from a doctor or other qualified professional would depend on the professional's relationship with the candidate and the specific content of the communication, as well as how the letter fits in with the totality of the other factors used to determine testing accommodations under this rule. Similarly, an applicant's failure to provide results from a specific test or evaluation instrument should not of itself preclude approval of requests for modifications, accommodations, or aids if the documentation provided by the applicant, in its entirety, is sufficient to demonstrate that the individual has a disability and requires a requested modification, accommodation, or aid on the relevant examination. This issue is discussed in more detail below.

...

Commenters also sought clarification of the term **individualized assessment**. The Department's intention in using this term is to ensure that documentation provided on behalf of a testing candidate is not only provided by a qualified professional, **but also reflects that the qualified professional has individually and personally evaluated the candidate as opposed to simply considering scores from a review of documents.** This

is particularly important in the learning disabilities context, where proper diagnosis requires face-to-face evaluation. Reports from experts who have personal familiarity with the candidate should take precedence over those from, for example, reviewers for testing agencies, who have never personally met the candidate or conducted the requisite assessments for diagnosis and treatment. (Emphasis added.)

28 CFR Pt. 36, App A, Ch. 1, pp. 784 – 785 (7-1-12 Edition)

“Considerable Weight” must be given to past Accommodations

The federal regulations are unambiguous:

“When considering requests for modifications, accommodations, or auxiliary aids or services, **the [testing] entity gives considerable weight** to ... such modifications, accommodations, or related aids and services provided in response to an Individualized Education Program (IEP) ... or a plan ... provided pursuant [in Section 504 Plan].” (Emphasis added.)

[28 CFR § 36.309(b)(1)(v) Examinations and courses.]

The Department of Justice affirmed this position in the LSAC Consent Decree, and this standard was not appealed by the LSAC to the Ninth Circuit.

“Paragraph 5(a): Certain Accommodations Previously Received

Paragraph 5 of the Consent Decree classifies requests for accommodations into two groups. The first group consists of applicants seeking certain accommodations that they have previously received on —any standardized examination offered in the United States related to applications for post-secondary admission.¶ 5(a). LSAC must grant those accommodations so long as: (1) the applicant provides proof that the sponsor of the earlier test granted the accommodation; (2) the applicant checks a box certifying that he or she continues to experience the functional limitations that required accommodation; (3) the accommodation at issue is either an extension of time, up to double time, or a non-time accommodation listed in Exhibit 1 to the Consent Decree; and (4) the accommodation would not require administering testing on more than one day.

The treatment of requests meeting these criteria generally was not the focus of the present appeal.” (LSAC Appeal, p. 3)

<http://www.dfeh.ca.gov/res/docs/Fahizah/SperoLSACorder20150807.pdf>

STORIES FROM THE TESTING ROOM

THE HIGH SCHOOL EQUIVALENCY (HSE) EXAMS

For guidance and information on the High School Equivalency Exams, the reader is directed to the report, “High School Equivalency: Resource Guide for the Workforce System,” which is attached in the Appendix, Item 6 (the “Resource Guide”).

The Resource Guide “was developed to provide current information and resources about the options for high school equivalency to individuals employed within the national workforce system,” (Resource Guide, p. 4) It was “developed for the U.S. Department of Labor by the Manhattan Strategy Group under Contract #DOL141RQ20734.” (Resource Guide, cover page)

According to the Resource Guide:

“The three most common examinations used to determine high school equivalency are the General Educational Development (GED®) test, the High School Equivalency Test (HiSET®), and the Test Assessing Secondary Completion (TASC).⁶ State adult education programs typically promote and endorse one or more of these approaches and offer a high school equivalency diploma that is officially sanctioned by the state in policy or law.

The National Adult Education Professional Development Consortium (NAEPDC), a consortium of state directors of adult education, has developed a state-by-state listing of the HSE tests endorsed by each state.” (Emphasis added.) (p. 9)

According to the Resource Guide:

“... [the Resource Guide] may be used in a variety of ways including but not limited to:

- Enhance an individual’s general or specific knowledge of the current landscape of HSE
- Provide a content structure for professional development about HSE within your state or area
- Provide a content structure for cross-system HSE discussion

Additionally, the [Resource] Guide may be tailored to your specific needs and sections of information could be abstracted for certain uses such as planning, report preparation, collaboration and partner discussions. Although the [Resource] Guide information does not provide an answer to the question of which HSE test is the best for my clients or area, it provides both basic descriptions of the popular HSE options and helpful links to more detailed sources.” (pp. 4 – 5)

http://www.careeronestop.org/TridionMultimedia/tcm24-22442_MSG_HSE_Guide_042715.pdf

In understanding the point-of-view of HSE exam applicants and adult educational professionals it is important to understand that the HSE’s offer two scoring levels. One is to demonstrate high school equivalency, the other, a higher score, to demonstrate college and career readiness. So for many test

⁶ The entities which administer these tests are: GED® Testing Service, ETS®, and CTB/McGraw-Hill™. Together these are referred to in the HSEE Report as the “Testing Entities.”

applicants it is important to score at a higher level so they can continue in college or a career training program. (Resource Guide, p. 9, 10 & 11)

STORIES FROM THE TESTING ROOM

THE POINT-OF-VIEW OF THE TEST APPLICANT WITH A LEARNING DISABILITY

In order to learn how a test applicant with a learning disability views the application and approval process, members of the Subcommittee took on the role of a test applicant with a learning disability and walked through the process in his or her shoes. Additionally, the Subcommittee looked at the responses to the Questionnaire, as discussed above. Finally the Subcommittee talked with professionals who work with test applicants with a learning disability to learn their stories.

What follows is a description of what is seen from the point-of-view of a test applicant with a learning disability, an adult education professional, or an evaluator. As part of this research a member of the Subcommittee went through the process for each test as if a test applicant with a disability. The step-by-step actions of the member are described below for each of the high school equivalency exams. Steps or instructions that are of concern or unclear are noted.

For consistency, the Subcommittee attempted to organize the discussion on each HSE exam in a similar manner. The purpose of some topics is obvious. For example, sometimes a test applicant will have a question not addressed in the Testing Entity's website, instructions, or forms. It is important that a test applicant be able to contact the Testing Entity. The ease with which a Testing Entity can be reached for questions is central to persons with disabilities having access to these high school equivalency exams. When a test applicant can't readily communicate with a Testing Entity's disability services office, it creates a barrier to accessing the high school equivalency exam. Thus, we have asked, "How does a test applicant contact a testing entity with a question about accommodations?"

Other topics need explanation. For example, current best practices in the field encourage requests for accommodations to include a Personal Statement, an Advocate's Statement, and/or Past Accommodations. This follows the move in the law to less rigid documentation requirements and flexibility in understanding disabilities.

The GED® Test

Finding Information on Test Accommodations for Test Applicants with Disabilities

When a member of the Subcommittee Googled "GED" two web addresses come up - <https://ged.com/> and <http://www.gedtestingservice.com/ged-testing-service>.

The member who researched this task first went to <https://ged.com> to find information on test accommodations for test applicants. It wasn't readily apparent. The web site asks the researcher to create a GED® account, but for privacy concerns the member chose not to. It is possible that information on test accommodations can be found once one has created a GED® account, but as the member did not create a GED® account, this could not be determined.

After clicking several of the live links the member determined that by going to the page for "GED® for Educators" and by clicking the graphic that says "GED Testing Service®" one is taken to the site that has information on test accommodations. This is the second web address noted above: <http://www.gedtestingservice.com/ged-testing-service>.

At this web page the member found the list which includes “Accommodations” by clicking the graphic “Public,” and then clicking the heading for “Programs and Services.” She was then able to go to the page <http://www.gedtestingservice.com/testers/accommodations-for-disability>. (She was also able to find this page by Googling “GED Test Accommodations.”)

At this web page, clicking “All US Test-Takers and International/Canadian Test-Takers Testing on Computer,” takes a test applicant to the page on test accommodations where a test applicant can learn about accommodations and the process for obtaining them.

The Subcommittee member who researched the GED® Test found the search for information on test accommodations a bit confusing. And, in some places the information provided seemed to contradict other information provided by the GED Testing Service®. For example, when she Googled “GED test accommodations” a web page came up on this topic - <https://www.gedtestingservice.com/uploads/files/7b61476f99d3e13d20c485169cec24a4.pdf> This web page informed the reader that the application should be submitted to the local GED® testing center and that review would take 60 days. However, on another web page the reader was told to submit the application by fax and that the review would take 30 days (see detailed discussion below of the application process).

The member then walked through the accommodations process as if she were a test applicant seeking to take the GED® Test with accommodations.

Register

The first step a test applicant with a learning disability must take is to register for the exam.

Test-takers register to take the GED® Test online at <https://ged.com/>, where each test-taker first signs up for a My GED™ account. According to the GED® website, the My GED™ account is

“... a personalized online program that guides test-takers through the entire testing process and assists in post-secondary transitions.

Get jurisdiction-specific information
 Prepare online with selected study materials using the study tool wizard
 Register
 Request accommodations
 Schedule test and re-test
 Review test day tips
 View and print enhanced score reports with study recommendations
 Order transcripts and diploma
 Transition to college & careers”

<http://www.gedtestingservice.com/educators/myged>

Request Accommodations

Once a test applicant has registered for the exam, if he is an individual with a learning disability he then must then apply for test accommodations.

As described above, a test applicant with a disability who wishes to obtain testing accommodations would go to the GED Testing Service® website.

<http://www.gedtestingservice.com/ged-testing-service>. He then clicks “Public,” and is taken to the web page <http://www.gedtestingservice.com/educators/home>. At this page, the test applicant clicks “Programs & Services.” A drop-down list appears, and under “2014” is the heading “Accommodations.”

When this link is clicked it takes the test applicant to the page “Accommodations from the GED Testing Service.” <http://www.gedtestingservice.com/testers/accommodations-for-disability>. On this page, the test applicant then clicks “U.S. Test Takers.” The test applicant is then on the page concerning “GED Testing Service® Accommodations.” <http://www.gedtestingservice.com/testers/computer-accommodations>

This page provides the following instructions:

“EASY STEPS TO APPLY FOR ACCOMMODATIONS

1. Create a MyGED™ account at www.GED.com
2. Print and complete the accommodations request form for your disability
3. Attach documentation for your disability
4. Fax your forms and supporting documents to 202-464-4894

It will take 30 days for GED Testing Service to review your request.”

The GED Testing Service® does not provide a phone number to its disability services office so a test applicant may contact the GED Testing Service® if he has a question.

<http://www.gedtestingservice.com/testers/computer-accommodations>

This web page further provides:

“Before you Request any testing accommodations, you must complete the following steps:

Create a MyGED™ account by signing up on www.GED.com or log-in to your MyGED™ account if you have an active account.

Answer yes on the GED Testing Service Registration form on the last question asking, “Do you need to request accommodated testing conditions for a documented disability?”

Once the registration form is submitted, you will receive an email indicating where you will submit your accommodations request form and supporting documentation.”
(Emphasis in the original.)

The web page then goes on:

“Preparing the Request Form and supporting Documentation for Review:

- 1 Read the [Documentation Guidelines for Candidates \(PDF\)](#). Make sure your supporting documentation meets our guidelines. You may want to review your documentation with an advocate, teacher or other professional.
- 2 Print a copy of the [Accommodations Request Form](#) for your disability and complete section one. You may also be able to obtain the request form from an adult education program offering GED® preparation courses.
- 3 Give your evaluator (i.e. doctor, psychologist) a copy of the Documentation Guidelines for Evaluators for your disability. Your evaluator should make sure that the

documentation they provide you meets our guidelines. In most cases, your evaluator will be a psychologist or doctor who administered a series of psychological, educational or medical tests with you, and provided you with a copy of a diagnostic report or a detailed letter that you will submit with your request form.

4. When you have completed the Accommodations Request Form, submit your completed request form along with the supporting documentation via fax directly to GED Testing Service, as directed on the bottom of the accommodations form. If you plan to test in Nova Scotia, Newfoundland and Labrador, Northwest Territories, or Yukon Territory, please send to the corresponding address listed here.

5. The accommodations request decision will be communicated to you from GED Testing Service to your email account provided during the registration process. In most cases, you will hear a decision within 30 days.

6. If you are not satisfied with the accommodations decision, you may appeal this decision by completing an Appeal Form (PDF) and providing us with additional documentation to review.” [The underlined words are live links.]

<http://www.gedtestingservice.com/testers/computer-accommodations>

The “GED Testing Service® Test Accommodation (Reasonable Adjustments) Request Form” application consists of fourteen (14) forms or instructions ranging in size from two (2) to six (6) pages. Together these forms are nearly 40 pages. (“GEDTS® Accommodations Request Form(s)”) <http://www.gedtestingservice.com/testers/computer-accommodations>

<http://www.gedtestingservice.com/testers/computer-accommodations>

To begin the process, a test applicant is instructed to complete a “GEDTS® Accommodation Request Form.” The test applicant must first decide which form applies to his disability. To be sure he is using the correct form the test applicant needs to read through the nearly 40 pages of forms and instructions. Each category of disability has a separate form. There are five separate “GED Testing Service® Accommodation (Reasonable Adjustments) Request Forms”:

- (1) “Intellectual Disabilities,”
- (2) “Learning and Other Cognitive Disabilities,”
- (3) “Attention Deficit Hyperactivity Disorder,”
- (4) “Psychological and Psychiatric Disorders,” and
- (5) “Physical Disorders and Chronic Health Conditions.”

Many test applicants with disabilities have co-occurring impairments and adult education professionals and evaluators expressed their confusion with this approach. For instance, a test applicant may have dyslexia, ADD and anxiety. It was unclear to the member who researched the GED® application process if the test applicant needs to submit three (3) separate forms? Another question was how is the evaluator’s report to be referenced?

Additionally, adult education professionals and evaluators expressed concern with Section 2 of the “GEDTS® Accommodations Request Forms.” Section 2 states:

“Please indicate what accommodations you are requesting, and provide a rationale for each:

Accommodation:

Rationale:

<http://www.gedtestingservice.com/uploads/files/8a566c077d2571f50b69cd23d9adf0e4.pdf>

The test applicant, adult education professional, and/or evaluator must describe the requested accommodation and rationale. Test applicants, adult education professionals and evaluators expressed confusion with this approach. Does one write “double-time,” or “100% extended time” or “100% extra time”? They expressed concern that if the accommodation was not described in the precise language preferred by the GED Testing Service®, then it would be rejected and a new application would need to be submitted.

The adult education professionals requested that instead of a blank line, that there be a list of testing accommodations that are typically requested, with a blank line for other accommodations requested.⁷

How to Contact the Testing Entity if a Test Applicant has a Question

The GED Testing Service® at the last page of each of its “GEDTS® Accommodations Request Forms” provides an email address for inquiries: Questions? Email us: accommodations@gedtestingservice.com.

A phone number to its disability services office is **not** provided, so a test applicant with a disability cannot contact the GED Testing Service® by phone if he has questions.

Submission

The GED Testing Service® requires that the “GEDTS® Accommodations Request Form” and accompanying documentation be faxed to them. On the last page of each “GEDTS® Accommodations Request Form” it states:

“Fax requests and documentation to 202-464-4894”

It is not possible to submit the request and documentation via mail or email. This requires that a test applicant locate a fax machine. The member who researched the GED® Test application process did not have a fax at home, and so needed to find an outside location with accessible hours, such as Staples, FedEx/Kinko’s or the UPS Store, to send a fax.

She chose her local FedEx/Kinkos location. FedEx/Kinko’s charges \$2.19 a page to send a fax to a long-distance phone number. As an example, the member researched how much it would cost to send in a request for one of her children. This fictitious applicant’s Request Form and documentation is thirty-three (33) pages. To fax at FedEx/Kinko’s this would cost about \$70 with tax. To send the form and documentation by U.S. Mail would be the cost of the copies (\$3.63), envelope (\$1), and postage (\$2.45) - \$7.08. Thus to send the documents by fax will increase the cost to request accommodations by almost \$65.

⁷ The College Board and ACT forms provide a list of testing accommodations typically requested. The College Board states its “lists are not exhaustive,” and invites an applicant who doesn’t see a requested accommodation on its list, to “submit it anyhow.”

Documentation and Recommendations from a Qualified Professional

Qualifications of the Evaluator

From the point-of-view of adult educational professionals and evaluators, the GEDTS® requires extensive documentation for the evaluator to prove he is indeed a “Qualified Professional.” For example, the GEDTS® form “Learning and Other Cognitive Disorders, Documentation Guidelines for Evaluators” requires the following:

A qualified professional must administer the tests in the evaluation. An individual is deemed to be qualified to conduct a neuropsychological or psychoeducational evaluation if s/he has had extensive graduate-level training in the area of assessment of learning disabilities with adults. This usually includes formal education and training in the history, nature, identification, and remediation of learning disabilities. The name, title, and professional credentials of the evaluator must be clearly stated in the documentation, **along with evidence of formal training and experience in the identification of learning disabilities.** The evaluator should be prepared, if asked, to provide evidence of comprehensive training and direct experience in the diagnosis and treatment of adults with learning disabilities. GED Testing Service® reserves the right to request evidence from an evaluator of their professional qualifications. Note that simply having a particular degree or license does not automatically mean that the evaluator has had sufficient formal training and expertise in learning disabilities. (Page 3, emphasis added.)

<http://www.gedtestingservice.com/uploads/files/1e82be0bced1db70902e1df056486d59.pdf>

The GEDTS® requires an extensive explanation and evidence that the evaluator is a Qualified Professional. The evaluator has already met the standards of a professional organization to be licensed or certified in the field; it appears from the point-of-view of an evaluator that the GEDTS® is asking the evaluator to go through this process anew to prove to the GEDTS® that the evaluator is qualified to hold this license or certification.⁸

Acceptable Assessments

In addition, the GED Testing Service® has a finite list of exactly which assessment instruments are acceptable. (See, “Learning and Other Cognitive Disorders, Documentation Guidelines for Evaluators,” pages 3 – 4, <http://www.gedtestingservice.com/uploads/files/1e82be0bced1db70902e1df056486d59.pdf>) This practice is explicitly addressed and rejected by the Department of Justice in its comments to the regulations:

“ ... an applicant's failure to provide results from a specific test or evaluation instrument should not of itself preclude approval of requests for modifications,

⁸ By comparison, the ACT requires “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.” It then requires the evaluator’s report to “Establish the professional credentials of the evaluator, including information about licensure or certification, education, and area of specialization.” The ACT does not require evidence of formal training or experience.

accommodations, or aids if the documentation provided by the applicant, in its entirety, is sufficient to demonstrate that the individual has a disability and requires a requested modification, accommodation, or aid on the relevant examination.”

28 CFR Pt. 36, App A, Ch 1, p. 785 (7-1-12 Edition)

The Qualified Professional’s Report

Adult education professionals and evaluators expressed concern that the GED Testing Service®’s procedure for reviewing requests for accommodation may not comply with the standards established in the ADA, the Regulations, and the Department of Justice comments because the GED Testing Service®, in addition to submission of the comprehensive neuropsychological or psychoeducational evaluation report, **requires** the completion of a worksheet on what tests and assessments were done and **the standard scores for each test or assessment**. (See discussion at page 10 of the HSEE Report.⁹) It is unclear why the GED Testing Service® would require this detailed information if the submitted report is prepared by a Qualified Professional.

For example, the “Learning Disabilities Accommodations Request Form” includes four (4) pages in which the test-taker (or the adult education professional or the evaluator) must fill-in the blanks with the scores for the each test administered to the test-taker (this information should already be in the Qualified Professional’s Evaluation Report).

<http://www.gedtesting.com/uploads/files/8a566c077d2571f50b69cd23d9adf0e4.pdf>

It appears to adult education professionals and evaluators that the GED Testing Service®’s own evaluators do not accept the conclusions and recommendations of the test-taker’s own Qualified Professional, and that the GED Testing Service®’s evaluator makes his own determination on whether the test-taker has a disability and requires accommodations based solely on the test scores without individually and personally evaluating the test-taker which, as the Department of Justice notes “is particularly important in the learning disability context, where proper diagnosis requires face-to-face evaluation.”¹⁰

⁹ “Reports from experts who have personal familiarity with the candidate should take precedence over those from, for example, reviewers for testing agencies, who have never personally met the candidate or conducted the requisite assessments for diagnosis and treatment.” 28 CFR pp. 784 – 785 (7-1-12 Edition)

¹⁰ Adult educational professionals and evaluators also expressed concern with an instruction on the “GED Testing Service®’s Accommodations Request Forms” which seem to question and supplant the professional judgment of the Qualified Professional who prepared the evaluation. On the “Attention-Deficit/Hyperactivity Disorder Accommodation Request Form” it states:

“NOTE: In most cases, extra time is NOT an appropriate accommodation for ADHD, because by definition individuals with ADHD have trouble sustaining attention over time. Please carefully consider alternative accommodations.” [Emphasis in the original.]

Similar language appears in the “Psychological & Psychiatric Disorder Accommodation Request Form.”

Related to this, in the “Attention-Deficit/Hyperactivity Disorder Accommodation Request Form” the GED Testing Service® instructs the Qualified Professional:

“Meeting DSM-IV-TR criteria for ADHD: In order to be diagnosed with ADHD, there must be evidence of symptoms that led to substantial impairment, prior to the age of 12, and that the current symptoms cannot be better accounted for by another disorder or other explanation. There must be evidence of current impairment in **two or more life settings** (academic, social, vocational). [Emphasis in original.]

The Qualified Professional's Recommendations for Accommodations

Also, concerns have been raised by adult educational professionals and evaluators about the GED Testing Service® not allowing a recommended accommodation that is typically allowed in other places to test-takers with disabilities.

For example, the Subcommittee has been advised by adult education professionals and evaluators that the GED Testing Service® does not offer text-to-speech as an accommodation, only readers. And, concern has been raised that a reader is only approved for test-takers with visual impairments and not for test-takers with a reading disorder, such as dyslexia. And, concern has been raised that a test applicant cannot have a reader with whom he is familiar.

For a student accustomed to a text-to-speech program, such as Dragon® Naturally Speaking, being approved for a reader may not best ensure that their true achievement levels are being measured on a timed test. Indeed, text-to-speech assistive technology has become so widespread through programs such as Text2Speech, now available for free from the Mac App Store, that it is very likely that within a very short time almost all students who struggle with fluent reading will use it on a daily basis.

Considerable Weight to Past Accommodations

The GED® Testing Service in its website and the “Documentation Guidelines For GED Testing Service® Test Accommodations (Reasonable Adjustments)” states:

“It would be helpful (but is not required) for you to provide additional supporting documentation, such as: ... [an] Individualized Education Plans (IEPs).”

<http://www.gedtestingservice.com/uploads/files/a50e01b8a3eb1b3335487b1d86bb8e97.pdf>

One of the points agreed to in the LASC Consent Decree, is that the existence of prior approval for accommodations should be given considerable weight. Indeed, it held that in some situations a copy of that approval from another testing entity would be sufficient for the approval of the same accommodations by the LASC.

This Consent Decree did not pertain to high school equivalency examinations, but adult education professionals and evaluators expressed their hope that the GED Testing Service® would give greater emphasis in the application process to the importance of submitting evidence of prior approval for an accommodation, and that the GED Testing Service® give, “considerable weight” to this evidence when reviewing a request for accommodations.

Personal Statement

Appropriateness of extra time accommodations. For many candidates with ADHD, who have trouble sustaining their attention over time, it may not be wise to dramatically lengthen the duration that they will sit for the test. For some candidates, simply providing them the opportunity to take the test in a distraction reduced room is the only accommodations needed.”

<http://www.gedtestingservice.com/uploads/files/6cad299d99a770ff81cac846321a993b.pdf>

Adult education professionals and evaluators expressed concern that the GED Testing Service® makes this recommendation to Qualified Professionals. First, a Qualified Professional will already know how to apply the requirements of DSM. And second, the GED Testing Service® evaluator does not have direct knowledge of the test-taker, so how does he know extended time is NOT an appropriate accommodation.

The Subcommittee could not ascertain if a “Personal Statement” from the test applicant would be accepted by the GED Testing Service® as part of the application for accommodations. However, at no place on the website or in GED® Test forms does the GED Testing Service® suggest one be submitted.

Advocate’s Statement

The Subcommittee could not ascertain if an “Advocate’s Statement” from the test applicant would be accepted by the GED Testing Service® as part of the application for accommodations. However, at no place on the website or in GED® Test forms does the GED Testing Service® suggest one be submitted.

Appeals

The GED® web page titled “GED Testing Service Accommodations” includes a section on appeals. This section states:

“You may appeal an accommodations decision if you’re unhappy with the outcome. Please complete the “Request for Testing Accommodations Appeal” and provide us with additional documentation to review. Disability experts review all appeal requests.”

<http://www.gedtestingservice.com/testers/computer-accommodations>

The GED Testing Service® has a separate document titled, “GED Testing Service® Accommodations (Reasonable Adjustments) Appeal Form” (GED® Appeal Form”).

Test applicants who have been denied in whole or in part the accommodations they requested can appeal by completing this form, attaching a copy of their original request for accommodations, a copy of the original documentation, and any additional documentation to support the appeal, and sending it all by fax to the GED Testing Service®.

<http://www.gedtestingservice.com/uploads/files/95872bca10569611f29096dffcdf62d5.pdf>

Section 1 of the GED® Appeal Form asks for the test applicant’s identifying information. Section 2 asks for the “Reason for Appeal,” and Section 3 asks for the “Requested Accommodations” with instructions on how to submit the Appeal. All three of these sections are similar to, if not identical to, the original request forms.

Adult education professionals and evaluators expressed some concerns regarding the GED® Appeal Form; most of these are the same concerns raised earlier with the application process. First is that the GED® Appeal Form and documentation must be faxed to the GED Testing Service®. Again, this can be a considerable expense that can be a barrier to persons with disabilities with limited financial resources.

The second concern of adult education professionals and evaluators is in Section 3 of the GED® Appeal Form, the GED Testing Service® again instructs the evaluator and test applicant that:

“NOTE: In most cases, extra time is NOT an appropriate accommodation for ADHD, because by definition individuals with ADHD have trouble sustaining attention over time. Please carefully consider alternative accommodations.”

As noted earlier in the HSEE Report, it is of concern to evaluators that the GED Testing Service® makes this recommendation to Qualified Professionals. Since the GED Testing Service® evaluator does not

have direct knowledge of the test-taker, then claiming that “providing extended time is NOT an appropriate accommodation” is not accurate. The Department of Justice makes clear that an individualized assessment made by a Qualified Professional who has “individually and personally evaluated the candidate” “should take precedence over those from, for example, reviewers for testing agencies, who have never personally met the candidate or conducted the requisite assessments for diagnosis and treatment.” 28 CFR Part 36, App. A, Ch. 1, p. 784 (7-1-12 Edition)

Third, the GED Testing Service® once again asks for the accommodations and rationale in an open format:

The form states:

“Please indicate what accommodations you are requesting, and provide a rationale for each:

Accommodation:

Rationale:

Adult education professionals and evaluators expressed concern that if the accommodation was not described in the precise language preferred by the GED Testing Service®, then the appeal would be rejected.

The HiSET® Exam

Finding Information on Test Accommodations for Test Applicants with Disabilities

When a member of the Subcommittee Googled “HiSet” the following webpage comes up - <http://hiset.ets.org/>

At this web page, the member clicked “For Test Takers,” which brings one to a web page titled, “ETS HiSET, For Test Takers.” http://hiset.ets.org/test_takers

On this page is a live link for “accommodations for test takers with disabilities and health-related needs.” Upon clicking this, the test applicant is taken to <http://hiset.ets.org/take/disabilities/>. This web page provides information on “Accommodations for Test Takers with Disabilities or Health-related Needs.” This web page may also be found by Googling “HiSet Test Accommodations.”

On this page a toll-free phone number and email address are provided to contact the ETS HiSET Disability Services office - 1-855-802-2748 and HiSetSSD@ets.org.

The ETS® document which provides instructions and guidance for test applicants with disabilities is the “HiSET® Test Taker Bulletin 2014” (the “Bulletin”). This document is lengthy and required careful reading by the member who researched the HiSET® who expressed concern that it might be better for test applicants if there is also a separate bulletin which only provides information on accommodations.

Register

Test-takers register to take the HiSET® Exam online at <http://hiset.ets.org/> or at a test center; this is determined by each participating state's requirements. The test is administered at state-approved test centers, such as community colleges and adult education centers. The locations of test centers are ascertained via a search function on the HiSET® web site. The website instructs test applicants to call HiSet® or visit a test center, if there are any questions. On the HiSET® home page, there is a link titled "Contact Us;" when clicked it brings the test-taker to the HiSet® phone number.

The HiSET® website includes the pdf of its "HiSet™ Test Taker Bulletin 2014." The Bulletin explains how a test taker registers for an exam. The steps to register are outlined at page 2.

Request Accommodations

As described above, a test-taker with a disability who wishes to obtain testing accommodations can access instructions by first going to the HiSET® website, click "For Test Takers," and then click the live link, "accommodations for test takers with disabilities and health related needs," (<http://hiset.ets.org/take/disabilities/>)

This will take the test-taker to a page titled, "Accommodations for Test Takers with Disabilities or Health-related Needs." This page includes a list of diagnosed disabilities typically allowed accommodations, and typical accommodations. Both these lists are not exhaustive. It also lists supports permitted by ETS® to all test-takers, even those without a documented disability. These include things such as earplugs, prescription medication, service animals, and highlighters. (These are frequently called, "comfort items.")

This web page also in bold instructs the test taker:

"Note: All test takers requesting any accommodations must register by mail through ETS Disability Services and have their accommodations approved before their test can be scheduled. ...

... Test takers requesting accommodations cannot schedule an appointment [to take the HiSet® exam] through their HiSET account. Once your accommodations have been approved, **you must contact ETS Disability Services to schedule your appointment.**" (Emphasis in original.)

This page then directs the test applicant to the "HiSet® Test Taker Bulletin 2014" (the "Bulletin"). The Bulletin explains how a test-taker registers for an exam. The Bulletin at page 2 includes, "Request disability accommodations if necessary," and directs the test taker to page 11. And, then at page 5 lists diagnosed disabilities that may be allowed accommodations and commonly approved accommodations for paper- and computer-based tests.

The Bulletin at page 11 includes the section on "Accommodations for Test Takers With Disabilities or Health-related needs." Page 12 provides contact information for the ETS® HiSET® Disability Services Office, including a toll-free direct phone line number to this Office. Following this contact information are instructions on how to request accommodations, and a list of frequently approved accommodations.

The Bulletin at page 16 includes the “HiSet Testing Accommodations Request Form.” It is five (5) pages with three (3) parts. Part I allows a test applicant to note on one form all the disabilities that apply. This includes a list of well-known disabilities, as well as a line to add “Other” disabilities.

Part II of the HiSET® Testing Accommodations Request Form asks for the “Testing Accommodations Requested.” It has a checklist of typically requested accommodations, as well as a section for “Other Accommodations Requested.” Two things are notable on this part of the Request Form: (1) a test applicant doesn’t have to write his own description of the requested accommodation – many are clearly listed, and (2) it doesn’t require justification be included next to each requested accommodation – this information will be provided in the required documentation submitted with the HiSET Testing Accommodations Request Form.

Part III of the HiSET® Testing Accommodation Request Form is the “Documentation Requirements.” This provides checklists for the documentation for different disabilities. The HiSET® Testing Accommodations Request Form directs the test applicant to visit www.ets.org/disabilities to view full documentation requirements. Of note here is that Part III includes in the “Additional Documentation” checklist, “Your Personal Statement,” although the suggested contents for the Personal Statement are not provided. It also lists “Letter from Rehab Counselor or Case Manager,” (this is also known as an “Advocate’s Statement”) as a possible “Additional Documentation.”

How to Contact the Testing Entity if a Test Applicant has a Question

The ETS® provides at pages 12 and 15 of its Bulletin information on a toll-free phone number for the direct line to its disabilities services offices. This information is also provided on its web site.

“ETS HiSET Disability Services

Monday – Friday

8:30 a.m. – 5 p.m. EST (New York)

Phone: 1-855-802-2748 (toll-free in the United States, American Samoa, Guam,

Puerto Rico, U.S. Virgin Islands and Canada)

1-609-359-5615 (all other locations)

Fax: 1-609-240-0525

Email: HiSetSSD@ets.org

Mail: ETS HiSET Disability Services

PO Box 6054

Princeton, NJ 08541-6054

Courier Service: ETS HiSET Disability Services

225 Phillips Boulevard

Ewing, NJ 08628-1426

To obtain HiSET materials in Spanish:

Phone: 1-609-359-5616

Toll-free: 1-855-598-4143”

Submission

ETS® directs a test-taker to mail in his application for accommodations. Page 15 of the Bulletin instructs the test applicant:

Submit completed forms, all appropriate documentation and the proper fee for the test you are taking. An incomplete application will cause a delay in processing your request.

“Send completed requests to:

Mail: ETS HiSET Disability Services
PO Box 6054
Princeton, NJ 08541-6054

Courier:ETS HiSET Disability Services
225 Phillips Boulevard
Ewing, NJ 08628-1426”

Documentation and Recommendations from a Qualified Professional

Qualification of the Evaluator

The ETS® “Policy Statement for Documentation of a Learning Disability in Adolescents and Adults, Third Edition” (2015), sets out the information an evaluator must include in an evaluation regarding his qualifications:

“The name, title, and professional credentials of the evaluator, including information about license or certification (e.g., licensed psychologist) as well as the area of specialization, employment, and state in which the individual practices must be clearly stated in the documentation. The following professionals would generally be considered qualified to conduct evaluations provided that they have additional training and experience in evaluating adolescents and adults with learning disabilities: clinical or educational psychologists; school psychologists; neuropsychologists; learning disabilities specialists; and medical doctors with demonstrated training and experience in the assessment of learning disabilities in adolescents and adults. Use of diagnostic terminology indicating a diagnosis of a specific learning disability by someone whose training and experience is not in these fields is not acceptable. It is not appropriate for professionals to evaluate members of their own families or children of close friends. All reports should be on letterhead, typed in English, dated, signed, and otherwise legible.”

http://www.ets.org/disabilities/documentation/documenting_learning_disabilities/#test

Although ETS® requires an evaluator to provide information on his credentials and qualifications, it does not require evidence that the evaluator is a Qualified Professional.

Acceptable Assessments

The ETS® Policy Statement requires a complete psychoeducational or neuropsychological assessment as part of the documentation. Of note, it provides a list of suggested assessments, but does not set out and limit the assessments to be used. At page 15 of the Bulletin it states:

“... The following list includes a variety of popular standardized measures for diagnosing LD and/or LD/ADHD. It is meant to be a helpful resource to evaluators but not a definitive or exhaustive listing. ...”

The test results must be included in the evaluator’s report, but not set out in a worksheet for the ETS®.

The Qualified Professional's Report

As noted above, Part III of the HiSET® Testing Accommodations Request Form is the Documentation Requirements. This provides checklists for different disabilities. The HiSET® Testing Accommodations Request Form directs the test applicant to visit www.ets.org/disabilities to view full documentation requirements.

This web page provides information to Test Takers, Evaluators, and Disability Service Providers. A live link, "See Information for Evaluators," brings one to a page titled, "For Evaluators." This page sets out the documentation requirements in six categories: Disability Documentation, Updating Documentation, Guidelines for Writing Diagnostic Reports, Tips for Evaluators, Insufficient Documentation, and Frequently Asked Questions.

Part III of the HiSet™ Testing Accommodations Request Form asks the test applicant to,

"Please submit the primary documentation and any additional documents you wish to include for each of your diagnosed disabilities."

The HiSet™ Testing Accommodations Request Form does not require the complete restatement on the HiSet™ Testing Accommodations Request Form of the assessments performed or the test applicant's scores. Instead, the ETS Testing Service® provides its documentation requirements (discussed here above), and then expects the Qualified Professional to comply with these requirements in the preparation of his report including recommendations.

One item of significance is that ETS® provides a process for test applicants with learning disabilities or ADHD to provide a "documentation update" instead of the preparation of a new comprehensive psychoeducational report.

"For test takers with LD and/or dual diagnoses of LD/ADHD, a complete and comprehensive re-evaluation is no longer necessary for basic accommodations (i.e., time-and-one-half and rest breaks). Instead, a documentation update may be sufficient if all three of the following conditions are met:

1. The test taker has a longstanding learning disability or LD/ADHD.
2. The original diagnostic evaluation was performed using adult measures in both the ability and achievement domains (e.g., WAIS-IV, Woodcock-Johnson III, or WIAT-III) in accordance with ETS documentation criteria.
3. The test taker has received accommodations through the Disability Services office on campus or on the job through their employer's HR office.

Individuals with a longstanding learning disability or dual diagnoses of LD/ADHD who are requesting more extensive accommodations (e.g., double time, reader, scribe, separate room, calculator, etc.) are required to send their documentation along with an update (if documentation is more than five years old). The update should demonstrate the ongoing impact of the disability on academic performance. **Since intellectual functioning is typically stable in adulthood, another WAIS-IV is not required if one was conducted in the testing covered by the initial report. For these individuals, a comprehensive update should include:**

1. a historical review of earlier testing, and
2. recent achievement and/or cognitive measures which demonstrate the ongoing impact of the disability on academic performance.

This change in policy reflects ETS's concerns about the increasing cost of neuropsychological or psycho-educational testing that many young adults with disabilities may have to bear. (Emphasis added.)

(http://www.ets.org/disabilities/evaluators/guidelines_writing_diagnostic_reports/)

An assessment of cognitive functioning is very expensive, and so not requiring a current assessment can save a test applicant up to \$1,000, thus increasing access to the exam for persons with disabilities.

The Qualified Professional's Recommendations for Accommodations

No concerns were raised by test applicants, adult education professional or evaluators on the question of whether the recommendations of a Qualified Professional were accepted by ETS®.

Considerable Weight to Past Accommodations

ETS® seems to give considerable weight to approvals from another testing entity and past accommodations. ETS® specifically asks in its Bulletin at page 14,

“If you are requesting accommodations on HiSet within one year of the date of your approval for accommodations on the GED, submit a copy of that approval with your request.”

Further, in Part I of the HiSet™ Testing Accommodations Request Form, it asks:

“Did you receive accommodations while in high school? If yes, list below.”

And, in Part III of the HiSet™ Testing Accommodations Request Form, in each checklist it requests as Additional Documentation the “Most Recent IEP, and “Most Recent 504 Plan.” It is notable that the Request Form does not ask for only a current IEP or 504 Plan. This, along with the fact the HiSet® instructions ask for IEP's and 504 Plans in several places, seems to support that ETS® follows the Department of Justice's position in the LSAC Consent Decree: even out-of-date IEP's and 504 Plans should be given “considerable weight.” Members of the Subcommittee wanted to know how often this provision is used by test applicants and how often the requested accommodations are approved.

Personal Statement

In the HiSet® Accommodations Request Form in Part III -Documentation Requirements in each non-physical category of disability, it lists a “personal statement” as additional, but not required, documentation. And in the categories of Blind or Low-Vision, Deaf or Hard-of-Hearing, and Physical Disability or Health-Related-Need, a personal statement is included in the list titled Preferred Documentation.

Advocate's Statement

In the HiSet® Accommodations Request Form in Part III -Documentation Requirements in each every category of disability, it lists a “Letter from Rehab Counselor or Case Manager ” (also called an “Advocate’s Statement”) as additional, but not required, documentation.

Appeals

If a Test Applicant’s request for accommodations is denied, or approved only in part, then ETS® recommends the Test Applicant to email or write ETS® Disability Services for an explanation and specific information on how the documentation may be improved. There is not a formal appeal process.

The TASC™ Test

Finding Information on Test Accommodations for Test Applicants with Disabilities

When a member of the Subcommittee Googled “TASC,” the website for “Total Administrative Services Corporation” came up. This is a company that provides administrative supports to businesses.

When she Googled “TASC Test,” the following webpage comes up – <http://www.tasctest.com/>.

At this web page, the member clicked “Test Takers,” which brings one to a web page titled, “TASC Test Information for Test Takers.” <http://www.tasctest.com/test-takers.html>

On this page is a graphic, “Get Support for Special Needs,” which is a live link to the web page that provides information on test accommodations. <http://www.tasctest.com/special-needs-accommodations.html> This web page is also found by clicking a live link under the banner heading, “Taking TASC Test.” One also finds this page by Googling, “TASC Test Accommodations.”

This web page does not include a phone number for a test applicant to use to call if he has questions about test accommodations. However, on the TASC test home page in the upper right-hand corner is a graphic, “Contact Us.” <http://www.tasctest.com/> When the banner is clicked, it brings up a page with an email inquiry form and a toll-free phone number to contact TASC – 1-888-282-0589. When one calls this number, it instructs the caller to press 3 to be contacted to disability services office.

Register

To register for the TASC™ Test, a test-taker goes to the TASC™ website, <http://www.tasctest.com/> . Here the test-taker is instructed to click a link for the state in which the test-taker wishes to take the test. For example, a test-taker in New York is instructed:

“New York: To find a TASC test center please visit:”
<https://newyork.tasctest.com>

A test-taker then enters his address, and is brought to a page with information on registering for the test and on nearby testing centers. The test-taker decides whether to take the test in a paper or computer format. All TASC™ test takers can choose to take either the paper or computer format.
<http://www.tasctest.com/taking-tasc-test-on-paper-for-test-takers.html>

Request Accommodations

A test taker with a disability who wishes to obtain testing accommodations can access instructions by first going to the TASC™ website, click “Test Takers,” and this brings the test-taker to a page titled, “TASC Test Information For Test Takers.” On this page there are **two** places a test-taker with a disability can click a live link for information. At the top is a banner; if one puts the cursor over “Taking TASC Test,” additional headings appear including “Accommodations for Disabilities.” In addition, on this page (TASC Test Information For Test Takers) at the bottom is an image with the title, “Get Support for Special Needs.” Both these links bring the test applicant to a page titled, “Accommodations for Disabilities.” <http://www.tasctest.com/special-needs-accommodations.html>

On this page, Accommodations for Disabilities, is a general introduction to accommodations and lists the alternate formats the TASC™ Test is available (in both English and Spanish): Braille, large print editions, and audio. This web page also includes a list of TASC™ form documents that they state may be helpful to the test applicant.¹¹

The first document is titled, “Overview of TASC Test Accommodations.” http://www.ctbassessments.com/pdfs/accommodations/1%20Overview%20of%20TASC%20Accommodations_062515.pdf This document explains which formats and resources are allowed to all test takers, and which require special approval (“special testing accommodations”). It explains that special testing accommodations must be approved by CTB/McGraw-Hill, and decisions are made within 30 days of the receipt of the request forms.

The second document is, “TASC Test Special Testing Accommodations Descriptions.” http://www.ctbassessments.com/pdfs/accommodations/2%20TASC%20Special%20Testing%20Accommodations%20Descriptions_062515.pdf **Here it is important to note at page 3** it states:

“The paper-based English and Spanish tests are also available in alternate formats including large print and Braille. **These alternate formats are available to any TASC examinee without formal approval from CTB/McGraw-Hill—they are not considered special testing accommodations.**” (Emphasis added.)

[The Subcommittee is not aware of any other testing entity that has this policy.]

The “TASC Test Special Testing Accommodations Descriptions” document then goes on to list special accommodations that may be authorized under TASC™ special testing accommodations. Descriptions of each accommodation are provided, and the list is presented in a chart format. The list concludes with the accommodations “Other,” and states

“Accommodations not otherwise listed may be approved based on the Evaluator’s recommendation and the Examinee’s particular needs. Special arrangements may be

¹¹ • Overview of TASC Accommodations
 • TASC Test Special Testing Accommodations Descriptions
 TASC Allowable Resources
 • Accommodations Request Form
 • TASC Examinee Guidelines
 • Evaluator Guidelines
 • TASC Prior Notification Form
 • TASC Test Special Testing Accommodations Approval Criteria

required to support such accommodations and not all testing centers may be able to provide all approved accommodations.”

“Other” accommodations are only available for the Paper Based Test. One accommodation not listed in this chart is a “Reader.”

The third document in this list is titled “TASC Test Allowable Resources” which lists supports permitted to all test takers, even those without documented disabilities. These include things such as blank place markers (i.e., yellow stickies), cushion, highlighters, erasers, and a magnifier device. (These are sometimes called “comfort items.”)

http://www.ctbassessments.com/pdfs/accommodations/3%20TASC%20Allowable%20Resources_062515.pdf The Examinee, in order to alert the test center he will use some comfort items, is instructed to:

“... submit the [TASC™ Test] Prior Notification Form to the Test Coordinator at their testing center when scheduling the testing date. Some allowable resources are provided as tools within the computer-administered version of TASC. The Test Coordinator may need to change system settings to provide examinees with access to these tools. The examinee should provide prior notification to the testing center for those computer-based features to be available.”

The “TASC Test Prior Notification Form” is also provided on this web page.

http://www.ctbassessments.com/pdfs/accommodations/7%20TASC%20Prior%20Notification%20Form_062515.pdf

The fourth document is the “TASC Test Special Testing Accommodations Request Form,” which including the cover and back pages, is thirteen (13) pages long. The first page provides an introduction and then step-by-step instructions on how an Examinee with a disability applies for test accommodations. The TASC™ Test Special Testing Accommodations Request Form then has five (5) sections.

http://www.ctbassessments.com/pdfs/accommodations/4%20TASCCommRequestForm_062515.pdf

Section One of the TASC™ Test Special Testing Accommodations Request Form is to be completed by the Examinee (or Examinee’s Advocate). It asks for the standard information for name and address. It also includes a “Release of Information,” to allow the sharing of records with CTB/McGraw-Hill. It also includes a section for an Examinee Advocate to complete. Section One does not include a specific place for the Examinee to give permission for CTB/McGraw-Hill to communicate directly with the Advocate. **Section 1.4 is to be completed if the Examinee is submitting an IEP.** This is discussed more fully below.

Section Two is to be completed by the Evaluator (or by the Examinee/Advocate with IEP). Section 2.1 asks for the Evaluator to note the Disability Category; the form provides a short list and states “Mark One or More” disability category.

Section 2.2 requires the Justification for Requested Accommodations, followed by Section 2.3 which requires detailed information if “Other” accommodations are requested:

“2.2 Justification for Requested Accommodations

Provide a justification for *each* testing accommodation requested in Section 2.4. If an IEP is being submitted in lieu of a licensed Evaluator’s report, cite the relevant IEP page and paragraph number.

Accommodation	Justification	IEP Pg., Para.
...		

2.3 “Other” Accommodations not Listed in Section 2.4

If “Other” has been selected in Section 2.4 on the following page, provide detailed instructions about how the accommodation should be implemented and any materials or equipment that might be needed in conjunction with the accommodation.

...

TASC™ Test Special Testing Accommodations Request Form, page 5.

Section 2.4 Special Accommodations Requested includes a chart of the test format requested, the accommodations requested, and a break-down for each subject-area test. The Evaluator is instructed to mark the appropriate box.

The Evaluator does not have to write his own description of the requested accommodation – many are clearly listed – unless the Examinee is requesting an “other” accommodation. However, Section 2.2 does require the Evaluator on the TASC™ Test Special Testing Accommodations Request Form to “Provide a justification for *each* testing accommodation.” It is unclear why CTB/McGraw-Hill requires the completion of this section when this information will already be in the Evaluation Report and any other documentation submitted.

Section Three of the TASC Test Special Testing Accommodations Request Form is also to be completed by the Evaluator. It asks for information on the Evaluator including License/Certification information. This section may be left blank if the Examinee is submitting an IEP.

Section 3.2 requests Documentation Regarding the Examinee’s Need for Accommodations. This section requires a complete reiteration of the information which should already be in the Evaluator’s comprehensive evaluation. The TASC Test Special Testing Accommodations Request Form already requires that the Evaluation Report accompany the request:

“A diagnostic *Evaluation Report* must accompany this request form. The Evaluation Report is described in the *Evaluator Guidelines for Requesting Special Testing Accommodations*.”

But, it then goes on to require the Evaluator, who must be a Qualified Professional, to restate the following information, which will already be in the Evaluation Report:

1. Accommodation
2. Diagnosis
3. Date
4. Measures
5. Level
6. Effect

It is not clear why CTB/McGraw-Hill requires this restatement. Do its evaluators not accept the conclusions and recommendations of the Qualified Professional in the Evaluation Report? Or, is it an attempt to save time by only reviewing a summary of the Evaluation Report?

Section Four is to be completed by the TASC™ Test Coordinator. This is not someone at CTB/McGraw-Hill, but rather a person at the site where the Examinee plans to take the test. At the bottom of Section Four are instructions to the TASC™ Test Coordinator on how to submit the Request Form; it may be submitted by either email, fax or mail by the TASC Test Coordinator. A street address and toll-free number are provided, as well.

Members of the Subcommittee expressed concern with having the TASC™ Test Coordinator review and submit the TASC™ Test Special Testing Accommodations Request Form. These concerns centered on the test applicant's privacy and the potential of disclosure by the TASC™ Test Coordinator, even inadvertently. The fewer people who can review and read the test applicant's private information, the less likely his privacy will be breached.

Section Five is to be completed by the TASC™ Accommodations Administrator. This is someone at CTB/McGraw-Hill. Section Five is a review checklist, resulting in the decision. The decision letter is then mailed to the Examinee.

The fifth document on the web page titled, "Accommodations for Disabilities," is the "Examinee Guidelines for Requesting TASC™ Test Special Testing Accommodations." This provides more detailed step-by-step instructions to the Examinee on the process, and includes a Frequently Asked Questions section and provides a toll-free direct phone number for the disability services office.

http://www.ctbassessments.com/pdfs/accommodations/5%20TASC%20Examinee%20Guidelines_062515.pdf

The final documents provided here are directed to the Evaluator. These are the "Evaluator Guidelines for Requesting TASC™ Test Special Testing Accommodations"

http://www.ctbassessments.com/pdfs/accommodations/6%20TASC%20Evaluator%20Guidelines_062515.pdf and "TASC™ Test Special Testing Accommodations Approval Criteria."

http://www.ctbassessments.com/pdfs/accommodations/8%20TASC%20Special%20Testing%20Accommodations%20Approval%20Criteria_062515.pdf

The Evaluator Guidelines walks an Evaluator through the TASC™ Test Special Testing Accommodations Request Form, and essentially restates the information provided here in the preceding paragraphs. Page 5 of the Evaluator Guidelines sets out what is required to be in an Evaluation Report, and includes a table with "Currency and Evaluator Requirements." This lists the Disability Category, followed by the Qualified Evaluator, and then the Evaluation Currency Requirements.

How to Contact the Testing Entity if a Test Applicant has a Question

Examinee Guidelines for Requesting TASC™ Test Special Testing Accommodations at page 3 states:

"For additional support, Examinees should contact the Test Coordinator at the testing center or a TASC Customer Care agent by email at: TASC_Helpdesk@ctb.com, or by telephone at 888-282-0589 between 7:30 a.m. and 8:00 p.m. Eastern Standard Time Monday through Friday."

This information is provided in a number of other places on the web site and in the forms, as well.

Submission

Page 2 of the TASC™ Test Special Testing Accommodations Request Form instructs the Examinee to:

“... In order to apply for Special Testing Accommodations for the TASC, this request form should be completed by the TASC Examinee (with the support of an Advocate, if desired) and by a licensed professional Evaluator. The Examinee should deliver the completed form to the TASC Test Coordinator at the local testing site for processing and verification. Once it is verified, it is to be submitted to CTB/McGraw-Hill’s TASC Accommodations Administrator for review and approval.” (Emphasis added.)

Then on page 7 of the Request Form the following submission instructions are given to the TASC™ Test Coordinator:

“When Sections 1 through 3 are complete, email, fax, or mail this request form and supporting documentation to:

CTB McGraw-Hill LLC
Attn: TASC Accommodations Administrator
c/o Customer Service Department
6901 N Michigan Road
Indianapolis, IN 46268

Email: TASC_Helpdesk@ctb.com
Toll-free Telephone: 888-282-0589
Toll-free FAX: 877-800-9389”

This information is provided in a number of other places as well, such as the Examinee Guidelines for Requesting TASC™ Test Special Testing Accommodations.

Documentation and Recommendations from a Qualified Professional

Qualifications of the Evaluator

The Evaluator Guidelines for Requesting TASC™ Test Special Testing Accommodations at page 5 sets out the following requirements for the Evaluator:

“A qualified professional must administer the objective measures used in the evaluation. An individual is qualified to assess an individual for a disability in one of the five categories if s/he has had appropriate graduate-level training and has appropriate certification in that area of disability. The name, title, and professional credentials of the Evaluator must be clearly stated in the documentation, along with the specification of formal training and experience in the area of the disability. CTB/McGraw-Hill reserves the right to request evidence of professional qualifications from an Evaluator (e.g., evidence of license or certification). Diagnosis of a disability by family members, even if otherwise qualified, will not be accepted as an independent evaluation.”

In addition to providing his qualifications in the report, the TASC™ Special Testing Accommodations Request Form at Section 3.1 requests the professional evaluator to complete the following:

“Name of Professional Evaluator:

Area of Specialization:

Highest Degree:

License/Certification Number:

License/Certification Expiration Date:

Issuing State:

Phone Number:

Email Address:

Diagnosing Professional's Signature and Affirmation:

I affirm that the information I have provided in Section 2 is complete, accurate, and reflects my professional evaluation.

Date Signed:

Comments:"

Acceptable Assessments

The Evaluator Guidelines for Requesting TASC™ Special Testing Accommodations provides at page 5:

“A diagnostic *Evaluation Report* must be appended to the TASC Special Accommodations Request Form.

The report must:

...

- be based on appropriate measures (objective measures and/or observation, if appropriate) clinical expertise, and professional judgment, ...”

CTB/McGraw-Hill does not provide a list of assessments they require or prefer. The Qualified Professional is expected to choose an appropriate assessment.

One instruction in the Evaluator Guideline for Requesting TASC™ Special Testing Accommodations is of note. In the guidelines for the Evaluation Report at page 5 it notes:

“Note: In some cases the Examinee may have an existing diagnostic report documenting a diagnosed disability. The Evaluator may use the existing diagnostic report if the documentation provides sufficient information to support a diagnosis and meets the currency requirements described in Table 1 of these guidelines. The Evaluator should affix a cover letter to the existing documentation describing its adequacy and how it was used to support the recommendations.”

Allowing an Evaluator to rely upon an existing diagnostic report is very important because it will save the Examinee time and money for the preparation of an Evaluation Report.

The Qualified Professional's Report

As noted above, Section 3.2 of the TASC™ Test Special Testing Accommodations Request Form asks the Evaluator at Item 1 to “Describe the testing accommodation(s) that you recommend for the Examinee and how they mitigate the effects of the disability. Address each specific subject-area test accommodation requested in Section 2.4.”

At Item 2 it then asks for the Specific Diagnostic Classification (and the DSM 5 Code if applicable). Items 3, 4, 5, and 6 ask for the date of the evaluation, a summary of the key objective

measures and applicable scores used in the evaluation, a description of the level of disability, and a description of the effect of the disability on the Examinee's performance on a paper-based or computer-based academic assessment. A diagnostic Evaluation Report must be attached.

It is unclear why CTB/McGraw-Hill requires the completion of this section when this information was already in the documentation submitted in the Qualified Professional's Evaluation Report. Evaluators were most concerned that the applicable scores used in the evaluation were required to be listed on this form.

The Qualified Professional's Recommendations for Accommodations

In reviewing the forms and practices of the TASC™ Test, only one question was raised: does CTB/Mc-Graw-Hill allow a reader. This accommodation is not included in the TASC™ Test Special Testing Accommodations Descriptions. In the Questionnaire responses, there were no responses regarding the TASC™ Test and the approval of usual and reasonable testing accommodations.

Considerable Weight to Past Accommodations

The TASC™ Test Special Testing Accommodations Request Form at Section 1.4 (page 4) is "To be Completed if the Examinee is Submitting an IEP." This section provides:

"If the Examinee has a valid IEP, then the Examinee may submit the IEP in lieu of a licensed professional Evaluator's diagnostic evaluation report. A valid IEP must meet the criteria below:

- The IEP was issued no more than three (3) years prior to the anticipated TASC test date.
- The examinee's disability is clearly indicated in the IEP.
- Each testing accommodation requested in Section 2.4 of this Special Testing Accommodations Request Form is clearly cross-referenced to a testing accommodation that is required as per the IEP with the relevant IEP page and paragraph number corresponding to each accommodation clearly cited.

If the Examinee's IEP meets these criteria and the Examinee chooses to submit the IEP in lieu of a licensed professional Evaluator's report, then the Examinee or Examinee's Advocate should:

- Attach a photocopy of the IEP to the application.
- Complete Section 2 of this Request Form.
- Provide the information requested below.

Date of IEP Meeting: _____"

This provision clearly follows the direction of the Department of Justice in the LSAC Consent Decree. New testing or documentation is not required if the Examinee had an IEP within three years of the date of the request for accommodations. Section 1.4 fails to also include 504 Plans, however, in the Evaluator Guidelines for Requesting TASC™ Special Testing Accommodations it states at page 2 that "a 504 Plan that is less than 1 year old" may be submitted.

Furthermore in the Examinee Guidelines for Requesting TASC™ Special Testing Accommodations it states at page 3:

“If the Examinee has been previously approved for accommodations on another high school equivalency test or on state summative accountability tests (via an approved Individualized Education Program/Plan or 504 Plan), the Evaluator may complete Sections 2 and 3 based on the diagnostic report supporting the prior accommodations approval as long as it meets the currency requirements described in the Evaluator Guidelines for Requesting TASC Special Testing Accommodations.”

The information provided by CTB/McGraw-Hill on prior accommodations is confusing and inconsistent. Adult education professionals and evaluators expressed concern that it was not clear what was required by CTB/McGraw-Hill. This provision should be clarified.

Personal Statement

The Subcommittee could not ascertain if a “Personal Statement” from the test applicant would be accepted by CTB/McGraw-Hill as part of the application for accommodations. However, at no place on the website or in the TASC™ documents does the CTB/McGraw-Hill suggest one be submitted.

Advocate’s Statement

The Subcommittee could not ascertain if an “Advocate’s Statement” from the test applicant would be accepted by CTB/McGraw-Hill as part of the application for accommodations. However, at no place on the website or in the TASC™ documents does the CTB/McGraw-Hill suggest one be submitted.

Appeals

CTB/McGraw Hill provides on page 6 of the Examinee Guidelines for Requesting TASC™ Special Testing Accommodations the following instructions:

“What if my request for accommodations is not approved?”

Your request may not be approved upon initial submission. You will receive a decision letter from CTB/McGraw-Hill that will indicate one of three decisions:

Yes, the request meets the required standards and accommodation recommendations are approved.

Approval is pending. Additional information or evidence is required.

○ If the decision letter indicates that approval is pending, then additional information is required. In this case, the decision letter will describe the additional information that must be provided and how to submit it.

No, the request does not meet required standards and is not approved. See comments below for details that must be addressed in subsequent appeals.

○ If the decision letter indicates that the request is **not** approved, then the decision letter will provide information about options with respect to appealing the decision. (Emphasis added.)

STORIES FROM THE TESTING ROOM

As noted above, the Subcommittee wanted to learn first-hand from individuals with learning disabilities, adult education professionals and evaluators their experiences obtaining and using accommodations on high school equivalency exams. It thus sent the Questionnaire to LDA's entire list serve and all the State Directors of Adult Education. Each Test Applicant's experience and summary of the documentation is provided in the Appendix, Item 3. What follows are their stories.

It is important to note here that the Subcommittee considers a "partial approval" and a request for more documentation to be a denial. This methodology may differ from the record-keeping employed by the Testing Entities regarding approvals of requests for accommodations. Furthermore, the Subcommittee not only asked about the application process and approvals, it also asked if once a Test Applicant is approved for accommodations for a test, are these accommodations indeed provided during the administration of the exam. Finally, following the summary of each Test Applicants' story, are concerns members of the Subcommittee have.

Test Applicant No. 1

In this case, an adult educator who responded to the Questionnaire related a case where the Qualified Professional's recommendation for accommodations for just one subtest for Test Applicant No. 1 was denied because "GED requires the candidate to use ALL of the approved accommodations on each test, regardless of the individual need." (Of note, this requirement is not stated anywhere on the website.)

It is not unusual for a test-taker to only need a specific accommodation for one subtest; for instance he may need a reader for science, but not the math section. Indeed, if he has someone read the math section, he may fail the test because he is unfamiliar with accessing the material in this manner. This requirement by GED Testing Service® seems to disregard the conclusions and recommendations of Test Applicant No. 1's Qualified Professional. Moreover, other testing entities regularly just approve accommodations for subparts; for example the College Board separately approves accommodations for the Math, Reading and Writing sections of the SAT.

Test Applicant No. 2

In the case of Test Applicant No. 2, a Qualified Professional concluded that Test Applicant No. 2 has a (1) Learning Disability (NOS) and (2) a Disorder of Written Expression. The Qualified Professional recommended that Test Applicant No. 2 request and receive the accommodations of 100% extra time, audio format, and a scribe for all testing situations.

GEDTS® responded to the request as "approved with changes." They approved the use of standard time plus 25%, but denied the requests for standard time plus 100%, audio format, and the scribe. The reason for no audio format or scribe was that, "Evaluation report/letter includes evidence that does not support, or that contradicts, the use of the requested accommodation." GEDTS®'s reason for the denial of double time was, "An alternate accommodation that is more appropriate based on the evidence has been approved."

Test Applicant No. 2 appealed and underwent additional testing with another Qualified Professional (Ph.D.) who concluded Test Applicant No. 2 has a (1) Reading Disorder 315.0, (2) Disorder of Written Expression 315.2, and (3) Learning Disorder NOS 315.9 (visual/perceptual/motor difficulty which affects all writing tasks/tests including math calculation).

Test Applicant No. 2 then requested the audiocassette format with extended time and additional supervised breaks. GEDTS® responded to the appeal with a denial for the audiocassette format and extended time, and marked the request for additional breaks as “incomplete,” stating that, “Evaluation report/letter does not sufficiently demonstrate the need for the following accommodation.”

This time the GEDTS® stated, among other things, “[The test applicant] is reportedly ‘an experienced [REDACTED],’ a job requiring the ability to use visual, perceptual, and motor skills to construct and/or maintain machinery, and must be able to read blueprints and other schematics to enable them to perform these tasks,” in denying the audiocassette format.

Members of the Subcommittee expressed concern that the GEDTS® has concluded that Test Applicant No. 2 does not need accommodations, and indeed states there is a “more appropriate accommodation” when the GEDTS® has not conducted an individual assessment of Test Applicant No. 2 (who had already been evaluated by two separate Qualified Professionals).

Test Applicant No. 3

In another case, a [REDACTED] with a hearing impairment and a previously diagnosed learning disability sought testing accommodations (Test Applicant No. 3). To obtain the current learning disability documentation needed to request and receive accommodations on the GED® test, [REDACTED] was re-evaluated for learning disabilities. The results of the evaluation were (1) Reading Disorder 315.0, (2) Math Disorder 315.2, and (3) Disorder of Written Expression 315.2. The psychologist, a Qualified Professional, recommended the following testing accommodations: private room for testing, extended time (standard time plus 100%), and additional supervised breaks.

GEDTS® denied [REDACTED] request for accommodations. The reason given was, “Evaluation report/letter is incomplete – the report is too brief/limited to allow for a comprehensive review.” Additionally, the GEDTS® response stated that,

“The evaluation report stated that you have a history of a significant hearing impairment, however the evaluator did not discuss what (if any) modifications were made to the standardized assessment procedures to accommodate for this hearing loss. Therefore, it is difficult to determine if your evaluation results were a direct result of your hearing loss or of a learning disability. When providing additional information, please also include additional information on the qualifications of your evaluator, as that information was not included in the documentation provided.”

The psychologist who evaluated Test Applicant No. 3 submitted the results of the student’s audiological evaluation and [REDACTED] ability to read lips. Additionally, the psychologist wrote a letter that described in detail the steps taken to address any possible need to accommodate the student’s hearing impairment during testing. The psychologist also submitted a 3-page document listing her own qualifications and experience.

The GEDTS® accommodations reviewer responded that GEDTS® had denied Test Applicant No. 3’s request for extended time and breaks, but would allow a private room for testing, even though the Qualified Professional had diagnosed Test Applicant No. 3 with a (1) Reading Disorder 315.0, (2) Math Disorder 315.2, and (3) Disorder of Written Expression 315.2.

Test Applicant No. 4

Test Applicant No. 4 was [REDACTED] old at the time he applied for accommodations and was evaluated by a K-12 school psychologist. The evaluation found significant discrepancies in the areas of reading, writing and math (more than 35 points in each area). The Qualified Professional's report stated the discrepancies suggested learning disabilities. Test Applicant No. 4 requested 100% extended time, a calculator for the entire math test, and a private room for testing. He did not request a reader because he said he would not be able to concentrate with a stranger in the room. Additionally, he did not request a reader specifically chosen by his education instructor, or text-to-speech, as these accommodations are not available for the GED® Test.

GEDTS® approved 100% extended time and a private room for testing, but not the calculator. Test Applicant No. 4 took the test with the approved accommodations; he passed, but without a "college readiness" score. His education instructor believes he would have attained the higher score with a familiar reader and a calculator. In light of the permeation today of assistive technology use by individuals with learning disabilities, the Subcommittee speculates that if text-to-speech AT was available to Test Applicant No. 4, then he may have requested this and achieved a higher score.

Test Applicant No. 5 (DSM-5)

Test Applicant No. 5 is a [REDACTED] old woman who was denied all requests for accommodations on the GED® test in March 2015. She presents with the new and novel situation in which she was evaluated by a Qualified Professional who used the DSM-5. The DSM-5 removed the score discrepancy model from LD diagnosis, and the GED® Request for Accommodations for LD form is designed to report and compare score discrepancies.

After extensive testing, the Qualified Professional concluded that Test Applicant No. 5 meets the criteria for Specific Learning Disability as defined by DSM-5. Test Applicant No. 5 was diagnosed with 315.00 Specific Learning Disorder with Impairment in Reading, with Impairment in Reading Fluency and Comprehension. The evaluators recommended the following accommodations on the GED® test: audiocassette administration with standard time + 50% and a calculator. Based on this 18-page report, Test Applicant No. 5's adult education teacher requested the following accommodations for her on the GED® test: Reader, standard time + 50%, talking calculator, private room.

The response from GEDTS® was to deny all of those requested accommodations, and the reason for each denial was the same: "There is no significant discrepancy between cognitive and academic achievement testing results."

The narrative report included with the request for accommodations clearly and comprehensively discussed the lack of discrepancies, which should not even be a consideration when using the DSM-5, which has now officially replaced the DSM-IV as the definitive manual of mental disorders to be used by all professionals in the field.

The members of the Subcommittee have concerns that GEDTS®'s lack of familiarity with the requirements of the DSM-5 demonstrates that whoever is reviewing the documentation for a request for accommodations may not have the professional credentials to understand and apply the diagnostic criteria required by the DSM-5. It is incongruous because in its forms the GEDTS® instructs qualified professionals on how to apply the requirements of the DSM-IV.

Test Applicant No. 6

Test Applicant No. 6 is a [REDACTED] male who was evaluated for learning disabilities by a Qualified Professional, a psychologist, on [REDACTED]. The results of his evaluation determined that he has an average intellectual ability. His basic reading, reading comprehension, and writing skills were within the average range, but his math, spelling, and fluency were below average. He showed a pattern of strengths and weaknesses within cognitive processes and related areas of achievement. There was a significant discrepancy between his cognitive ability and math problem solving, math calculation, spelling, reading fluency, and writing fluency, and a specific learning disability was identified. In addition, he had a diagnosis of AD/HD. The psychologist recommended standard time plus 50% and the use of a calculator as appropriate testing accommodations.

Test Applicant No. 6 applied for GED® testing accommodations on [REDACTED]. He received an e-mail from GEDTS® regarding his accommodations request on [REDACTED]. He was approved for standard time plus 50%, but was denied the use of a calculator. The reason given was that “The 2014 version of the GED® test includes a drop-down calculator available to all test-takers for questions where a calculator is allowed. Since this is a standard option, it does not require an accommodation approval.”

The first five questions of the math section do not have a drop-down calculator, and Test Applicant No. 6 appealed. GEDTS® responded, “When GEDTS® developed the new test, they left the first 5 questions on the math test without a calculator to measure calculation skills. It was their decision that a calculator not be allowed for these 5 questions. The drop down calculator is available for the rest of the test, and on the Science and Social Studies module.” Without a calculator for the entire test, Test Applicant No. 6 declined to take the GED® Test.

Prior to 2014 a calculator was allowed as an accommodation for test-takers who have a math disability. With a calculator as an accommodation these individuals can demonstrate they meet a core standard. Without the calculator, not only will these individuals fail to demonstrate their ability to meet the core standard; but also, their overall math score will be lower than what it could be with the use of a calculator. Since the GED® score determines which level of certificate the student earns, as well as whether or not the student may be accepted into an apprenticeship program, the refusal to allow a calculator as a reasonable accommodation for students with math disabilities places a barrier to those students.

The Ready-Test

In addition to the individual stories described above, the Subcommittee also heard of concerns from adult education professionals about the GED Ready™ Test.

The GED Ready™ is the official practice test for the 2014 GED® Test. It was published in January 2014 as an online test, available to anyone for \$24. The 2014 GED® Test is available as a computer-based test, but is not available online.

When the GED Ready™ was first published, it did not include any built-in testing accommodations. Most accommodations could be made by the test-taker anyway (text-to-speech reader, use of a calculator, private room, scribe), but most people with disabilities require extra time on standardized tests, and there was no way to take the GED Ready™ with extra time. That left students with disabilities in a position where they were unable to accurately predict their readiness to pass the GED® test – a discriminatory practice.

When GEDTS® was first contacted about this issue on January 13, 2014, Dr. John Hosterman, Director, Accessibility and Disability Services, GEDTS®, replied in an email that candidates could pause the GED Ready as often as they wish to get the extra time they needed (see attached email). There actually was no way to pause the test. When GEDTS® was next contacted about this issue on March 31, 2014, Martin Kehe, VP Products, GEDTS®, replied in an email that it didn't seem to be a major cause for concern nationally, but they would try to determine a solution in the coming weeks and months (see attached email).

On October 24, 2014, nine months after the initial publication of the GED Ready™, GEDTS® announced that the GED Ready™ was available online with built-in extra time (25%, 50%, or 100%). Test-takers requesting extra time on the GED Ready™ must have indicated on their MyGED® account that they will be requesting accommodations, but they do not have to be already approved for those accommodations before requesting a GED Ready™ with extra time. Test-takers must go to their MyGED® account for a phone number to request that the test with extra time be delivered to their computer. However, efforts to have the test delivered to testing centers with the built-in extra time have been frustrating.

On December 10, 2014, GEDTS® announced that they were changing the GED Ready™ score ranges to more accurately predict a student's success on the GED® Test. The announcement stated that, "Since launching the GED Ready® practice test a year ago, we've looked very closely at how students scored on the practice test compared to how they scored on real test. A detailed analysis showed us that students who earned a higher yellow 'Too Close to Call' score were actually quite likely to pass the GED® test. As a result, we've extended the GED Ready® practice test green 'Likely to Pass' score ranges downward several scaled score points. The new ranges give you and your students improved feedback on whether they're ready to pass the test."

STORIES FROM TESTING ROOM

GENERAL CONCERNS AND QUESTIONS

Third-Party Authorizations

On a separate, but related, matter, concerns have arisen with all three Testing Entities on the identification and authorization of someone with whom the Testing Entities may discuss confidential information about the test applicant. This issue can be easily remedied.

On the GED® form there is a line asking the test-taker to provide “Additional person(s) you permit GED Testing Service® Accommodations Team to discuss/contact on your behalf regarding this request.” Most test-takers assume this would be a parent or relative, but in fact the best person is likely an adult education teacher or administrator who is currently working with the student. It should be a person knowledgeable about the test-taker, his disability, and the logistics of the GED® Test. If an inappropriate person is listed as the “additional person” then it may make it difficult for the test-taker to productively respond to any requests or communications with the GED Testing Service®

The HiSet® forms do not ask the test applicant to authorize an adult education teacher or administrator who can discuss confidential matters with the ETS Testing Service®. It would be helpful if such an authorization would be added to the forms.

The TASC™ Special Testing Accommodations Request Form includes a section for an “Examinee’s Advocate” to complete. The form also includes a “Release of Information,” to allow the sharing of records by school officials, test center representatives, and healthcare providers with CTB/MCGRAW HILL/McGraw Hill, but interestingly this does not include an “Examinee’s Advocate.” It would be interesting to learn if CTB/McGraw Hill considers the Examinee’s signature on this page that permission.

Suggested Language

The Subcommittee recommends the following language and form of release for a third-party authorization be included in the accommodations request forms. It is based upon the language in the TASC™ Request Form:

The examinee may have an advocate to support the request for accommodations. An advocate is someone other than the professional evaluator, such as a parent or teacher, who helps the examinee complete and submit this form, is familiar with the accommodations request process, and who may communicate on behalf of the examinee with the testing entity regarding the accommodations request process for this examinee.

If you are the advocate, please provide the information below.

Name of advocate: _____

Relationship to examinee: _____

Mailing address: _____

Phone number: _____

Email address: _____

I grant permission to CTB/McGraw-Hill and the Advocate to communicate about my education-related records and/or my medical or psychological records in connection with my request for testing accommodations.

Examinee signature and date: _____

Disability Service Providers and Certifications of Documentation

Many testing entities include a process for approval of accommodations whereby a school or college's disability service provider can certify that the documentation on record at the school or college meets the documentation requirements of the testing entity. These testing entities include the College Board and the ACT. As noted above, CTB/McGraw-Hill has some process like this, but it needs to be clarified.

As an example, the ETS® provides this alternate method for approval of accommodations. It allows a Disability Service Provider:

“to provide verification of an individual's use of accommodations either in college or in the workplace as a shortcut for approval of certain specific accommodations for particular disabilities. For example, a test taker with LD, LD/ADHD or ADHD requesting 50 percent extended time and breaks can submit a completed COE [Certification of Eligibility] without documentation if the documentation meets ETS criteria.”

http://www.ets.org/disabilities/disability_service_providers/coe/

When a Disability Service Provider signs the COE, he is verifying that the documentation on file in his office meets all of the ETS® criteria. The test applicant is reminded in these instructions to not send documentation, as this will cause a delay in receiving a response. ETS® trusts the Disability Service Provider's professional integrity and judgment. A similar process is used by the College Board and ACT.

Of important note here is that ETS® does not allow this alternate method of approval of accommodations for the HiSet®. It carves out this exception. Indeed, none of the Testing Entities allow this method for any high school equivalency exam.

A Certification of Eligibility method of approval should be available for high school equivalency exams

The Subcommittee understands that most test applicants for a high school equivalency exam have not been enrolled in a school or college for many years, but it is the Subcommittee's position that the Testing Entities should develop guidelines for the application and implantation of this method.

The reasons to allow this method are many. First, and most simply, allowing this method will save test applicants money. In many cases applicants can save thousands of dollars.

A second reason is privacy. A test applicant who has already provided extensive documentation and personal information, sometimes about his mental health, to a college or workplace may not wish to share this private information with yet another organization. For example, a test applicant may be a student with a psychiatric illness at a community college. All of the student's records to establish this disability and need for test accommodations are on record at the community college, but to protect his privacy the student does not want all these records shared with yet another organization (a testing entity) because of his concerns this information may be known by too many people. He thus declines to apply

to take a high school equivalency exam. If the community college's disability services office could provide a Certification of Eligibility, then this test applicant's privacy will be protected and he will take the exam.

How is a Request for Accommodations Processed by the Testing Entity?

The Subcommittee is interested in learning how applications for test accommodations are processed by each Testing Entity. It was not in a position to obtain direct knowledge of this process and recommends that another task force independent of the Testing Entities be charged with this task.

Specifically, the Subcommittee is interested in the following information.

1. Once a Testing Entity receives a request for accommodation, how is it determined who will review the accommodations request?
2. What are the professional credentials of the Testing Entity reviewers? Are they "Qualified Professionals" as defined by federal law?
3. How many Qualified Professionals, on behalf of the Testing Entity, review each request for accommodations?
4. Are independent Qualified Professionals ever engaged to review a request for accommodations? How is it determined if a request for accommodations will be sent to an independent Qualified Professional for review?
5. When an independent Qualified Professional is engaged to review a request for accommodation, how is a conflict-of-interest avoided? If the independent Qualified Professional approves the accommodations requested, then the Testing Entity will incur additional costs in the administration of the exam? It could appear that the Qualified Professional who reviews the requests for accommodations feels pressure to deny requests in order to assure additional work from the Testing Entity. Are there protocols in place to avoid this "appearance of impropriety"?
6. If a Testing Entity allows the submission of a "Personal Statement," "Advocate's Statement," or recent IEP or 504 Plan, how are these documents considered in relation to the reports prepared by the Qualified Professional? Are the IEP or 504 Plan given "considerable weight"?

The Subcommittee is also interested in how an appeal is evaluated by the Testing Entity.

The Subcommittee is interested in the following information, and again recommends that another task force independent of the Testing Entities be charged with this task. .

1. Who reviews an appeal? Are those persons Qualified Professionals? How many Qualified Professionals review each appeal?
2. How many appeals are submitted each year? What percentage of all applications for accommodations end up in an appeal? What percentage of denials in whole or in part are appealed?
3. What percentage of appeals result in approval for all the accommodations originally requested? What percentage of appeals result in approval for some of the accommodations originally requested? What percentage of appeals result in a denial for all accommodations originally requested?

“BEST ENSURE” VERSUS “ACCESS”

Finally, in researching the HSEE Report the Subcommittee ascertained a standard applied by the GED Testing Service® when reviewing requests for test accommodations which standard may not comply with the current federal law on examinations.

Pearson Vue (which owns and oversees the GED Testing Service®) states on its website the standard it applies when determining if a test-taker is approved for test accommodations.

“The purpose of test accommodations is to provide candidates with full access to the test. However, test accommodations are not a guarantee of improved performance or test completion. Pearson VUE provides reasonable and appropriate test accommodations to individuals with documented disabilities who demonstrate a need for test accommodations.” (Emphasis added.)

<http://home.pearsonvue.com/test-taker/Test-accommodations.aspx>

However, this is not the standard required by federal law and regulations, and supported by the Department of Justice and federal courts.

The federal regulations are unambiguous:

The examination is selected and administered so as to **best ensure** that, when the examination is administered to an individual with a disability that impairs sensory, manual, or speaking skills, **the examination results accurately reflect the individual's aptitude or achievement level or whatever other factor the examination purports to measure**, rather than reflecting the individual's impaired sensory, manual, or speaking skills (except where those skills are the factors that the examination purports to measure). 28 CFR§ 36.309(b)(1)(i)

At first review, the difference between “access” and “best ensure” seems inconsequential. However, in practice, the difference is monumental.

Imagine a person with a visual impairment requires a certain type of screen reader to fluently read the questions, but he is only allowed another unfamiliar screen reader that allows him to “read” the questions, but slowly and with great effort. He can “access” the test with the unfamiliar screen reader, but barely pass the test. When permitted his usual screen reader, he scores in top 1%. Under the GED Testing Service® “access” standard, he will only ever be able to obtain a low pass on the test. Under the “best ensure” standard, set out by federal law, he can demonstrate his very high achievement level.

STORIES FROM THE TESTING ROOM

High School Equivalency Exams:

Accessibility of Accommodations for Persons with Learning Disabilities

February 2016

Appendix

1. Questionnaire
2. Review of Documentation Form
3. Test Applicant Experiences
4. Excerpts from Applicable Laws, Regulations and Department of Justice Comments
5. Department of Justice publication, ADA Requirements, Testing Accommodations (9/2015)
6. High School Equivalency: Resource Guide for the Workforce System (2015)

Item 2

High School Equivalency Exam Questionnaire

If you have ever asked for accommodations for yourself, your child, or a student, on the GED®, Hi-Set®, or TASC™ test, please complete our survey by clicking on the link below so we can work together to ensure all test-takers with disabilities obtain the accommodations allowed by law.

LDA's mission is to create opportunities for success for all individuals affected by learning disabilities. To this end, LDA promotes legal, appropriate, and effective accommodations for all students with disabilities, including learning disabilities, on high school equivalency exams (GED®, Hi-Set®, or TASC™).

Note: We will not release your contact information to any other organization or entity, but we may contact you to let you know more ways you can help.

1. Contact information
 - a. First name
 - b. Last name
 - c. Email address
 - d. Street address
 - e. City
 - f. State
 - g. Zip Code
 - h. Phone number, including area code, where you can be contacted

2. Which of the following describes you best?
 - a. Parent of a student who has requested accommodations on a high school equivalency test.
 - b. Teacher of a student who has requested accommodations on a high school equivalency test.
 - c. Student who has requested accommodations on a high school equivalency test.

3. Which high school equivalency exam did you take, or apply to take?
 - a. GED®
 - b. Hi-Set®
 - c. TASC™

4. Did you request accommodations for a disability on that test?
 - a. Yes
 - b. No

5. Please choose one of the following answers regarding your accommodations request:
 - a. I received all of the accommodations I requested.
 - b. I received only some of the accommodations I requested.
 - c. I did not receive any of the accommodations I requested.

6. Please tell us your story in the space below (limit 250 words).

7. May LDA contact you for more information about your high school equivalency exam experience?
 - a. Yes
 - b. No

Item 3
LDA Research Group
On
High School Equivalency Exams
And
Accommodations for Persons with Disabilities
Review of Documentation Form

Person whose documentation is being evaluated: _____

1. In your opinion is the professional who conducted this evaluation qualified to do so? (Why or why not?)
2. Are the following items included in the psychoeducational report?
 - _____ a. current functional limitations
 - _____ b. test behavior observations
 - _____ d. achievement measures
 - _____ e. assessment of cognitive functioning
 - _____ f. areas of cognitive and information processing
 - _____ g. a list of all tests administered with standard scores
 - _____ h. a clear, diagnostic statement
 - _____ i. history of accommodations used and requested
 - _____ j. rationale for each accommodation requested
3. Is the evaluation current and comprehensive enough to make accommodation decisions? (Why or why not?)
4. Do you agree with the diagnosis made by the professional who conducted the evaluation? (Why or why not?)
5. Do the accommodations that are requested match the disability that is diagnosed? (Why or why not?)
6. In your opinion, based on the assessment provided, what accommodations should be made for this individual when taking a high school equivalency credentialing exam?

Name of Evaluator

Professional Credentials

Date

Item 4

Excerpts from Applicable Laws, Regulations, and U. S. Department of Justice Comments

Americans with Disabilities Act, As Amended (2008), Federal Regulations

28 CFR Part 36

§ 36.309 Examinations and courses.

(a) General. Any private entity that offers examinations or courses related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes shall offer such examinations or courses in a place and manner accessible to persons with disabilities or offer alternative accessible arrangements for such individuals.

(b) **Examinations.**

(1) **Any private entity offering an examination covered by this section must assure that—**

(i) **The examination is selected and administered so as to best ensure** that, when the examination is administered to an individual with a disability that impairs sensory, manual, or speaking skills, **the examination results accurately reflect the individual's aptitude or achievement level or whatever other factor the examination purports to measure**, rather than reflecting the individual's impaired sensory, manual, or speaking skills (except where those skills are the factors that the examination purports to measure);

(ii) **An examination** that is designed for individuals with impaired sensory, manual, or speaking skills **is offered at equally convenient locations**, as often, and in as timely a manner as are other examinations; and

(iii) **The examination is administered in facilities that are accessible to individuals with disabilities** or alternative accessible arrangements are made.

(iv) **Any request for documentation, if such documentation is required, is reasonable and limited to the need for the modification, accommodation, or auxiliary aid or service requested.**

(v) When considering requests for modifications, accommodations, or auxiliary aids or services, **the entity gives considerable weight to documentation of past modifications, accommodations, or auxiliary aids or services received in similar testing situations**, as well as such modifications, accommodations, or related aids and services provided in response to an Individualized Education Program (IEP) provided under the Individuals with Disabilities Education Act or a plan describing services provided pursuant to section 504 of the Rehabilitation Act of 1973, as amended (often referred to as a Section 504 Plan).

(vi) **The entity responds in a timely manner** to requests for modifications, accommodations, or aids to ensure equal opportunity for individuals with disabilities.

Department of Justice Comments to the Federal Regulations

In the comments accompanying these regulations, first published in September 2010 in the Federal Register, the Department of Justice stated the follow:

The Department initially set out the parameters of appropriate documentation requests relating to examinations and courses covered by this section in the 1991 preamble at 28 CFR part 36, stating that "requests for documentation must be reasonable and must be limited to the need for the modification or aid requested." See 28 CFR part 36, app. B at 735 (2009). **Since that time, the Department, through its enforcement efforts pursuant to section 309, has addressed concerns that requests by testing entities for documentation regarding the existence of an individual's disability and need for a modification or auxiliary aid or service were often inappropriate and burdensome. ...**

Commenters [to the proposed regulations] including disability rights groups, State governments, professional associations, and individuals made it clear that, in addition to the proposed regulatory change, other significant problems remain for individuals with disabilities who seek necessary modifications to examinations and courses. These problems include detailed questions about the nature of documentation materials submitted by candidates, testing entities' questioning of documentation provided by qualified professionals with expertise in the particular disability at issue, and lack of timeliness in determining whether to provide requested accommodations or modifications. ... [Other] commenters [mostly testing entities] focused most of their attention on the following language from the NPRM [footnote on NPRM] preamble:

Generally, a testing entity should accept without further inquiry documentation provided by a qualified professional who has made an individualized assessment of the applicant. Appropriate documentation may include a letter from a qualified professional or evidence of a prior diagnosis, or accommodation, or classification, such as eligibility for a special education program. When an applicant's documentation is recent and demonstrates a consistent history of a diagnosis, there is no need for further inquiry in the nature of the disability. A testing entity should consider an applicant's past use of a particular auxiliary aid or service.

[After considerable discussion on the concerns of the testing agencies, the Department of Justice concluded:]

It remains the Department's view that, when testing entities receive documentation provided by a qualified professional who has made an individualized assessment of an applicant that supports the need for the modification, accommodation, or aid requested, they shall generally accept such documentation and provide the accommodation.

... The Department believes that appropriate documentation may vary depending on the nature of the disability and the specific modification or aid requested, and accordingly, testing entities should consider a variety of types of information submitted. Examples of types of information to consider include recommendations of qualified professionals familiar with the individual, results of psycho-educational or other professional evaluations, an applicant's history of diagnosis, participation in a special education program, observations by educators, or the applicant's past use of testing accommodations. ...

... **No one piece of evidence may be dispositive in make a testing accommodation determination.** The significance of a letter or other communication from a doctor or other qualified professional would depend on the professional's relationship with the candidate and the specific content of the communication, as well as how the letter fits in with the totality of the other factors used to determine testing accommodations under this rule. Similarly, an applicant's failure to provide results from a specific test or evaluation instrument should not of itself preclude approval of requests for modifications, accommodations, or aids if the documentation provided by the applicant, in its entirety, is sufficient to demonstrate that the individual has a disability and requires a requested modification, accommodation, or aid on the relevant examination. This issue is discussed in more detail below.

...

Commenters also sought clarification of the term individualized assessment. The Department's intention in using this term is to ensure that documentation provided on behalf of a testing candidate is not only provided by a qualified professional, but also reflects that the qualified professional has individually and personally evaluated the candidate as opposed to simply considering scores from a review of documents. This is particularly important in the learning disabilities context, where proper diagnosis requires face-to-face evaluation. Reports from experts who have personal familiarity with the candidate should take precedence over those from, for example, reviewers for testing agencies, which have never personally met the candidate or conducted the requisite assessments for diagnosis and treatment.

Some testing entities objected to the NPRM preamble's use of the phrase "without further inquiry." The Department's intention here is to address the extent to which testing entities should accept documentation provided by an applicant when the testing entity is determining the need for modifications, accommodations, or auxiliary aids or services. The Department's view is that applicants who submit appropriate documentation, e.g., documentation that is based on the careful individual consideration of the candidate by a professional with expertise relating to the disability in question, should not be subjected to unreasonably burdensome requests for additional documentation. While some testing commenters objected to this standard, it reflects the Department's longstanding position. When an applicant's documentation demonstrates a consistent history of a diagnosis of a disability, and is prepared by a qualified professional who has made an individualized evaluation of the applicant, there is little need for further inquiry into the nature of the disability and generally testing entities should grant the requested modification, accommodation, or aid.



Testing Accommodations

Standardized examinations and other high-stakes tests are gateways to educational and employment opportunities. Whether seeking admission to a high school, college, or graduate program, or attempting to obtain a professional license or certification for a trade, it is difficult to achieve such goals without sitting for some kind of standardized exam or high-stakes test. While many testing entities have made efforts to ensure equal opportunity for individuals with disabilities, the Department continues to receive questions and complaints relating to excessive and burdensome documentation demands, failures to provide needed testing accommodations, and failures to respond to requests for testing accommodations in a timely manner.

The Americans with Disabilities Act (ADA) ensures that individuals with disabilities have the opportunity to fairly compete for and pursue such opportunities by requiring testing entities to offer exams in a manner accessible to persons with disabilities. When needed testing accommodations are provided, test-takers can demonstrate their true aptitude.

The Department of Justice (Department) published revised final regulations implementing the ADA for title II (State and local government services) and title III (public accommodations and commercial facilities) on September 15, 2010. These rules clarify and refine issues that have arisen over the past 20 years and contain new and updated requirements.

Overview

This publication provides technical assistance on testing accommodations for individuals with disabilities who take standardized exams and other high-stakes tests. It addresses the obligations of testing entities, which include private, state, or local government entities that offer exams related to applications, licensing, certification, or credentialing for secondary (high school), postsecondary (college and graduate school), professional (law, medicine, etc.), or trade (cosmetology, electrician, etc.) purposes. Who is entitled to testing accommodations, what types of testing accommodations must be provided, and what documentation may be required of the person requesting testing accommodations are also discussed.

What Kinds Of Tests Are Covered?

Exams administered by any private, state, or local government entity related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes are covered by the ADA and testing accommodations, pursuant to the ADA, must be provided.¹

Examples of covered exams include:

- High school equivalency exams (such as the GED);
- High school entrance exams (such as the SSAT or ISEE);
- College entrance exams (such as the SAT or ACT);
- Exams for admission to professional schools (such as the LSAT or MCAT);
- Admissions exams for graduate schools (such as the GRE or GMAT); and
- Licensing exams for trade purposes (such as cosmetology) or professional purposes (such as bar exams or medical licensing exams, including clinical assessments).

What Are Testing Accommodations?

Testing accommodations are changes to the regular testing environment and auxiliary aids and services² that allow individuals with disabilities to demonstrate their true aptitude or achievement level on standardized exams or other high-stakes tests.

Examples of the wide range of testing accommodations that may be required include:

- Braille or large-print exam booklets;
- Screen reading technology;
- Scribes to transfer answers to Scantron bubble sheets or record dictated notes and essays;
- Extended time;
- Wheelchair-accessible testing stations;
- Distraction-free rooms;
- Physical prompts (such as for individuals with hearing impairments); and
- Permission to bring and take medications during the exam (for example, for individuals with diabetes who must monitor their blood sugar and administer insulin).

¹ This document does not address how the requirements or protections, as applicable, of Title II of the ADA, Section 504 of the Rehabilitation Act, the assessment provisions in the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA), and their implementing regulations, apply to, or interact with, the administration of state-wide and district-wide assessments to students with disabilities conducted by public educational entities.

² See 28 C.F.R. §§ 36.303(b), 36.309(b)(3) (providing non-exhaustive lists of auxiliary aids and services).

Who Is Eligible To Receive Testing Accommodations?

Individuals with disabilities are eligible to receive necessary testing accommodations.

Under the ADA, an individual with a disability is a person who has a physical or mental impairment that substantially limits a major life activity (such as seeing, hearing, learning, reading, concentrating, or thinking) or a major bodily function (such as the neurological, endocrine, or digestive system). The determination of whether an individual has a disability generally should not demand extensive analysis and must be made without regard to any positive effects of measures such as medication, medical supplies or equipment, low-vision devices (other than ordinary eyeglasses or contact lenses), prosthetics, hearing aids and cochlear implants, or mobility devices. However, negative effects, such as side effects of medication or burdens associated with following a particular treatment regimen, may be considered when determining whether an individual's impairment substantially limits a major life activity.

A substantial limitation of a major life activity may be based on the extent to which the impairment affects the condition, manner, or duration in which the individual performs the major life activity. To be "substantially limited" in a major life activity does not require that the person be unable to perform the activity. In determining whether an individual is substantially limited in a major life activity, it may be useful to consider, when compared to most people in the general population, the conditions under which the individual performs the activity or the manner in which the activity is performed. It may also be useful to consider the length of time an individual can perform a major life activity or the length of time it takes an individual to perform a major life activity, as compared to most people in the general population. For example:

- The condition or manner under which an individual who has had a hand amputated performs manual tasks may be more cumbersome, or require more effort or time, than the way most people in the general population would perform the same tasks.
- The condition or manner under which someone with coronary artery disease performs the major life activity of walking would be substantially limited if the individual experiences shortness of breath and fatigue when walking distances that most people could walk without experiencing such effects.
- A person whose back or leg impairment precludes him or her from sitting for more than two hours without significant pain would be substantially limited in sitting, because most people can sit for more than two hours without significant pain.

A person with a history of academic success may still be a person with a disability who is entitled to testing accommodations under the ADA. A history of academic success does not mean that a person does not have a disability that requires testing accommodations. For example, someone with a learning disability may achieve a high level of academic success, but may nevertheless be substantially limited in one or more of the major life activities of reading, writing, speaking, or learning, because of the additional time or effort he or she must spend to read, write, speak, or learn compared to most people in the general population.

What Testing Accommodations Must Be Provided?

Testing entities must ensure that the test scores of individuals with disabilities accurately reflect the individual's aptitude or achievement level or whatever skill the exam or test is intended to measure. A testing entity must administer its exam so that it accurately reflects an individual's aptitude, achievement level, or the skill that the exam purports to measure, rather than the individual's impairment (except where the impaired skill is one the exam purports to measure).³

- **Example:** An individual may be entitled to the use of a basic calculator during exams as a testing accommodation. If the objective of the test is to measure one's ability to solve algebra equations, for example, and the ability to perform basic math computations (e.g., addition, subtraction, multiplication, and division), is secondary to the objective of the test, then a basic calculator may be an appropriate testing accommodation. If, however, the objective of the test is to measure the individual's understanding of, and ability to perform, math computations, then it likely would not be appropriate to permit a calculator as a testing accommodation.

³ Under Section 309 of the ADA, any person (including both public and private entities) that offers examinations related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes must offer such examinations "in a place and manner accessible to persons with disabilities or offer alternative accessible arrangements for such individuals." 42 U.S.C. § 12189. Under regulations implementing this ADA provision, any private entity that offers such examinations must "assure that the examination is selected and administered so as to best ensure that, when the examination is administered to an individual with a disability that impairs sensory, manual, or speaking skills, the examination results accurately reflect the individual's aptitude or achievement level or whatever other factor the examination purports to measure, rather than reflecting the individual's impaired sensory, manual, or speaking skills (except where those skills are the factors that the examination purports to measure)." 28 C.F.R. § 36.309. Likewise, under regulations implementing title II of the ADA, public entities offering examinations must ensure that their exams do not provide qualified persons with disabilities with aids, benefits, or services that are not as effective in affording equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as that provided to others, 28 C.F.R. § 35.130(b)(1)(iii), and may not administer a licensing or certification program in a manner that subjects qualified individuals with disabilities to discrimination on the basis of disability. 28 C.F.R. § 35.130(b)(6). Both the title II and title III regulations also require public and private testing entities to provide modifications and auxiliary aids and services for individuals with disabilities unless the entity can demonstrate an applicable defense. 28 C.F.R. §§ 35.130(b)(7), 35.160(b), 35.164; 28 C.F.R. §§ 36.309(b)(1)(iv-vi), (b)(2), 36.309(b)(3).

What Kind Of Documentation Is Sufficient To Support A Request For Testing Accommodations?

All testing entities must adhere to the following principles regarding what may and may not be required when a person with a disability requests a testing accommodation.

- **Documentation.** Any documentation if required by a testing entity in support of a request for testing accommodations must be reasonable and limited to the need for the requested testing accommodations. Requests for supporting documentation should be narrowly tailored to the information needed to determine the nature of the candidate's disability and his or her need for the requested testing accommodation. Appropriate documentation will vary depending on the nature of the disability and the specific testing accommodation requested.

Examples of types of documentation include:

- Recommendations of qualified professionals;
- Proof of past testing accommodations;
- Observations by educators;
- Results of psycho-educational or other professional evaluations;
- An applicant's history of diagnosis; and
- An applicant's statement of his or her history regarding testing accommodations.

Depending on the particular testing accommodation request and the nature of the disability, however, a testing entity may only need one or two of the above documents to determine the nature of the candidate's disability and his or her need for the requested testing accommodation. If so, a testing entity should generally limit its request for documentation to those one or two items and should generally evaluate the testing accommodation request based on those limited documents without requiring further documentation.

- **Past Testing Accommodations.** Proof of past testing accommodations in similar test settings is generally sufficient to support a request for the same testing accommodations for a current standardized exam or other high-stakes test.
 - **Past Testing Accommodations on Similar Standardized Exams or High-Stakes Tests.** If a candidate requests the same testing accommodations he or she previously received on a similar standardized exam or high-stakes test, provides proof of having received the previous testing accommodations, and certifies his or her current need for the testing accommodations due to disability, then a testing entity should generally grant the same testing accommodations for the current standardized exam or high-stakes test without requesting further documentation from the candidate. So, for example, a person with a disability who receives a testing accommodation to sit for the SAT should generally get the same testing accommodation to take the GRE, LSAC, or MCAT.

receiving testing accommodations. Candidates who are individuals with disabilities and have never previously received testing accommodations may also be entitled to receive them for a current standardized exam or high-stakes test. In the absence of documentation of prior testing accommodations, testing entities should consider the entirety of a candidate's history, including informal testing accommodations, to determine whether that history indicates a current need for testing accommodations.

- **Example.** A high school senior is in a car accident that results in a severe concussion. The report from the treating specialist says that the student has post-concussion syndrome that may take up to a year to resolve, and that while his brain is healing he will need extended time and a quiet room when taking exams. Although the student has never previously received testing accommodations, he may nevertheless be entitled to the requested testing accommodations for standardized exams and high-stakes tests as long as the post-concussion syndrome persists.
- **Example.** A student with a diagnosis of ADHD and an anxiety disorder received informal, undocumented testing accommodations throughout high school, including time to complete tests after school or at lunchtime. In support of a request for extended time on a standardized exam, the student provides documentation of her diagnoses and their effects on test-taking in the form of a doctor's letter; a statement explaining her history of informal classroom accommodations for the stated disabilities; and certifies that she still needs extended time due to her disabilities. Although the student has never previously received testing accommodations through an IEP, Section 504 Plan, or a formal private school policy, she may nevertheless be entitled to extended time for the standardized exam.
- **Qualified Professionals. Testing entities should defer to documentation from a qualified professional who has made an individualized assessment of the candidate that supports the need for the requested testing accommodations.** Qualified professionals are licensed or otherwise properly credentialed and possess expertise in the disability for which modifications or accommodations are sought. Candidates who submit documentation (such as reports, evaluations, or letters) that is based on careful consideration of the candidate by a qualified professional should not be required by testing entities to submit additional documentation. A testing entity should generally accept such documentation and provide the recommended testing accommodation without further inquiry.
 - Reports from qualified professionals who have evaluated the candidate should take precedence over reports from testing entity reviewers who have never conducted the requisite assessment of the candidate for diagnosis and treatment. This is especially important for individuals with learning disabilities because face-to-face interaction is a critical component of an accurate evaluation, diagnosis, and determination of appropriate testing accommodations.
 - A qualified professional's decision not to provide results from a specific test or evaluation instrument should not preclude approval of a request for testing accommodations where the documentation provided by the candidate, in its entirety, demonstrates that the candidate has a disability and needs a requested testing

accommodation. For example, if a candidate submits documentation from a qualified professional that demonstrates a consistent history of a reading disorder diagnosis and that recommends the candidate receive double time on standardized exams based on a personal evaluation of the candidate, a testing entity should provide the candidate with double time. This is true even if the qualified professional does not include every test or subtest score preferred by the testing entity in the psychoeducational or neuropsychological report.

How Quickly Should A Testing Entity Respond To A Request For Testing Accommodations?

A testing entity must respond in a timely manner to requests for testing accommodations so as to ensure equal opportunity for individuals with disabilities. Testing entities should ensure that their process for reviewing and approving testing accommodations responds in time for applicants to register and prepare for the test.⁶ In addition, the process should provide applicants with a reasonable opportunity to respond to any requests for additional information from the testing entity, and still be able to take the test in the same testing cycle. Failure by a testing entity to act in a timely manner, coupled with seeking unnecessary documentation, could result in such an extended delay that it constitutes a denial of equal opportunity or equal treatment in an examination setting for persons with disabilities.

How Should Testing Entities Report Test Scores for Test-Takers Receiving Disability-Related Accommodations?

Testing entities should report accommodated scores in the same way they report scores generally. Testing entities must not decline to report scores for test-takers with disabilities receiving accommodations under the ADA.

Flagging policies that impede individuals with disabilities from fairly competing for and pursuing educational and employment opportunities are prohibited by the ADA.

“Flagging” is the policy of annotating test scores or otherwise reporting scores in a manner that indicates the exam was taken with a testing accommodation. Flagging announces to anyone receiving the exam scores that the test-taker has a disability and suggests that the scores are not valid or deserved. Flagging also discourages test-takers with disabilities from exercising their right to testing accommodations under the ADA for fear of discrimination. Flagging must not be used to circumvent the requirement that testing entities provide testing accommodations for persons with disabilities and ensure that the test results for persons with disabilities reflect their abilities, not their disabilities.

To view model testing accommodation practices and for more information about the ADA, please visit our website or call our toll-free number:

⁶ Testing entities must offer examinations to individuals with disabilities in as timely a manner as offered to others and should not impose earlier registration deadlines on those seeking testing accommodations.

- **ADA Website:** www.ADA.gov
- **ADA Information Line:** 800-514-0301 (Voice) and 800-514-0383 (TTY); M-W, F 9:30 a.m. – 5:30 p.m., Th 12:30 p.m. – 5:30 p.m. (Eastern Time)
- **Model Testing Accommodation Practices Resulting From Recent Litigation:**
http://www.ada.gov/l sac _ best _ practices _ report . docx

For persons with disabilities, this publication is available in alternate formats.

Duplication of this document is encouraged.

High School Equivalency: Resource Guide for the Workforce System

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The U.S. Department of Labor Education & Training Administration does not endorse any specific products or vendors mentioned throughout the Guide.

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INTRODUCTION

The content and process for obtaining high school equivalency (HSE) credentials has changed significantly. These changes, many of which are ongoing, have profound implications for persons seeking a high school equivalency credential as well as for the national workforce system, which promotes, delivers, or connects with the options for equivalency. Precipitated by the 2014 changes in the test of General Educational Development (GED®), including major adjustments in test management, content, cost, and test administration, the national and state-by-state landscape for high school equivalency now includes a growing number of alternative HSE options.

Audience and Purpose

This Resource Guide was developed to provide current information and resources about the options for high school equivalency to individuals employed within the national workforce system. Individuals within workforce-focused organizations/agencies who serve clients who have not attained a high school diploma should be familiar with the major options for HSE that are in use nationwide. Additionally, individuals who have job functions related to the implementation of the Workforce Innovation and Opportunity Act (WIOA) need basic information about HSE in order to address the needs of clients who do not have high school diplomas and are eligible to be served under WIOA. Other stakeholders in the national workforce system or in partnership with that system—including adult education providers, postsecondary counselors and staff, community-based organization staff, etc.—may also find the information and resources in this Guide useful.

The Guide represents an inventory of key documents within the HSE issue/topic that are widely accepted and used. As a general HSE resource, it is not inclusive of the many closely related issues and content areas such as work readiness or employability skills or other related resources such as work readiness credentials or career pathway models.

Guide Structure

The Guide features ten topical sections. With the exception of the *HSE Background Information* section, each section follows a similar structure. That is, each section presents information and searchable resources followed by a text box of Workforce System Implications and concluding with a set of Need-to-Know questions. Workforce system implications discuss possible ways in which the section topic and information may impact programs/staff within the national workforce system. These implications are expanded in the Need-to-Know discussion using a checklist format of leading questions. Questions are divided into those for *state level* workforce system staff and stakeholders and those for *local level* workforce system staff and stakeholders. Because the answers to these questions typically are different from state to state, the answers to them are too varied to describe in this document. However, the questions provide a recommended format for discussion and represent useful state and local information to share between systems and stakeholders.

Using This Document

The Resource Guide may be used in a variety of ways including but not limited to:

- ✓ Enhance an individual’s general or specific knowledge of the current landscape of HSE
- ✓ Provide a content structure for professional development about HSE within your state or area
- ✓ Provide a content structure for cross-system HSE discussion

Additionally, the Guide may be tailored to your specific needs and sections of information could be abstracted for certain uses such as planning, report preparation, collaboration and partner discussions. Although the Guide information does not provide an answer to the question of *which HSE test is the best for my clients or area*, it provides both basic descriptions of the popular HSE options and helpful links to more detailed sources.

Key Terms and Acronyms

AEFLA – Adult Education and Family Literacy Act (Title II of the 2014 Workforce Innovation and Opportunity Act)

CCR – College and Career Ready

Common Core – Common Core State Standards. Developed in 2009 by the National Governors Association and the Council of Chief State School Officers, the Common Core is a set of academic standards in mathematics and English language arts/literacy. They are learning goals that outline what a student should know and be able to do at the end of each grade.

GED® – The test of General Educational Development. A registered trademark of the American Council on Education and Pearson Vue who own and manage the GED®.

HiSET – High School Equivalency Test. The HiSET test is a new (2014) high school equivalency product of the Educational Testing Service and Iowa Testing Programs.

HSE – High School Equivalency

TASC – Test Assessing Secondary Completion. The TASC is a new (2014) high school equivalency product of the CTB/McGraw-Hill company.

USED-OCTAE – U. S. Department of Education Office of Career, Technical, and Adult Education

USDOL-ETA – U.S. Department of Labor Employment and Training Administration

WIOA – Workforce Innovation and Opportunity Act

A. HSE BACKGROUND INFORMATION

Importance of HSE

For most Americans, the path to a secure economic future begins early in life with positive family, social, and educational experiences that typically result in a high school diploma and a clear plan for pursuing postsecondary education or other job skills training. However, an alarmingly large number of individuals disconnect from traditional education or skills training pathways, often without obtaining a basic high school credential. According to the Annie E. Casey Foundation 2012 report, [*Youth and Work: Restoring Teen and Young Adult Connections to Opportunity*](#), the longer a person is without a high school credential or without the skill training necessary for a family-sustaining wage, the more likely that individual will remain in poverty and require significant public welfare and social services.

HSE Attainment Data

As reported in the 2012 [American Community Survey](#), 25.7 million people between ages 18 and 64 are without a high school diploma or equivalent, representing more than 13 percent of this population. As reported by two sources – [Pew Research Center](#) and the [National Center for Education Statistics](#) - this demographic dropout statistic is decreasing for minority students although the achievement gap in standardized test performance between white and non-white populations remains a significant concern within secondary education. Also, as an impact of the 2008-2012 economic recession, many states have seen an increase in the number of older, unemployed, or underemployed adults who are accessing high school credential options as they plan for future employment.

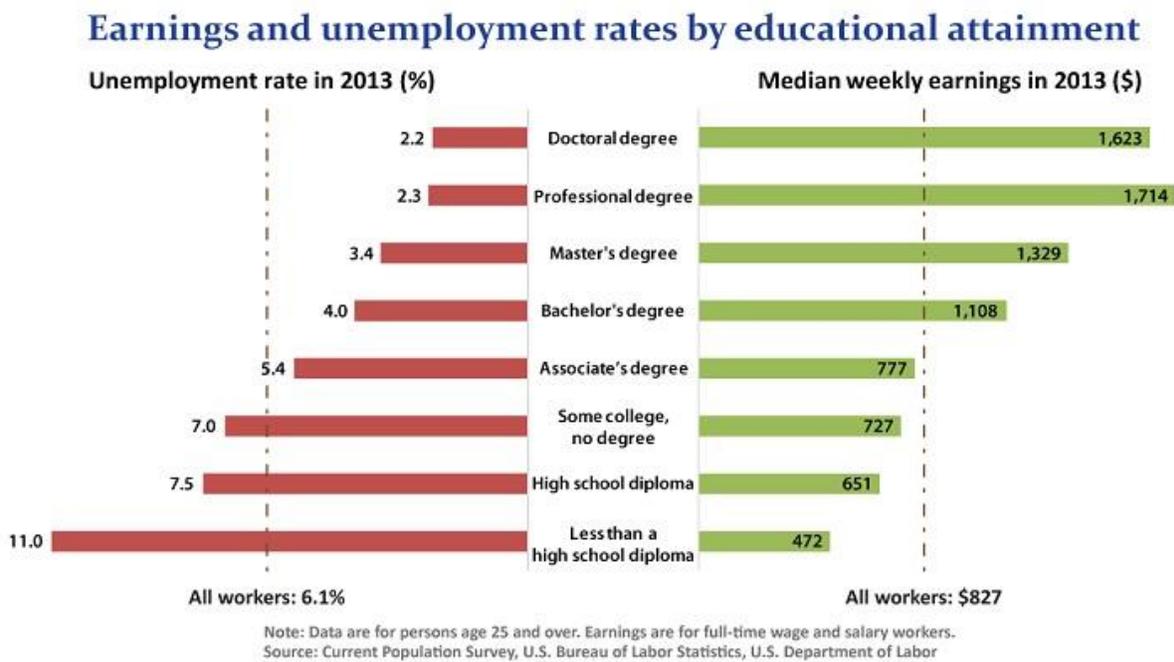
Although the nation's public school graduation rate has increased eight percentage points—to 74.7%—in the last decade, estimates of the actual numbers of 18-24 year-olds who lack high school credentials range from five to six million individuals. Dropout rates for minority students are more than double those of white students. Students from low-income families (defined in the Workforce Innovation and Opportunity Act (WIOA) as 70 percent of the lower living standard income level) dropped out of high school at six times the rate of their peers from higher-income families. Research by the [American Youth Policy Forum](#) shows that only about one-quarter of those who fail to graduate with their peers eventually receive diplomas. Another one-quarter will eventually complete the GED® test and receive a high school equivalent credential. However, an alarming one-half never attain a high school credential.

A study conducted by the Washington State Board for Community and State Colleges, referred to as the [Tipping Point](#), was instrumental in solidifying the connection between attaining HSE and future success, defined as the ability to earn a family-sustaining wage. Specifically, the five-year longitudinal study of over 10,000 adult basic education students enrolled in the Washington college system revealed that the tipping point to attain economic self-sufficiency was a high school diploma or its equivalent plus at least two semesters of college credits and a recognized educational/employment credential.

The GED® test is the most widely recognized alternative to a high school diploma. According to the [2012 GED® Statistical Report](#), 607,000 individuals took the full test and 418,000 passed it. Most GED® candidates were male (56 percent) and about half were white (48 percent). About three-fourths reported they had completed 10th grade

(71 percent) and, on average, candidates had been out-of-school for nine years when they took the test. The average age of GED® test takers is 26. Nationally, one in every seven high school diplomas is a GED® certificate and one in every 20 college entrants has completed the GED® test. Although the [value of the GED®](#) test has been [challenged](#) in recent years, it is commonly recognized as an important milestone in gaining the education and skills needed to succeed in today’s economy. With increasing evidence of the role education plays in helping individuals earn family-sustaining wages—including the value of postsecondary certificates—a high school diploma or equivalent is one of the steps needed to succeed in today’s labor market.

The U.S. Bureau of Labor Statistics [reports](#) that personal income and employment rates are significantly correlated to educational attainment. Whereas the average wage earner in the U.S. makes about \$815 per week, an adult without a high school diploma or equivalent earns only \$472. In 2013, the unemployment rate for these individuals was over 11%. They are typically the first individuals to realize the impact of a downturn in the economy. According to the [Alliance for Excellent Education](#), not attaining a high school diploma or its equivalent results not only in challenges for the individual, but in significant costs to society at large in areas such as limited economic productivity and related tax revenue potential. There is also the need for public funds for supportive programs including public welfare, remedial public education, workforce vices, and incarceration.



The Link between HSE and College and Career Readiness Standards

The past decade began the [content standards movement](#), initiating secondary education systems across the nation to reform their K-12 curricula to be more rigorous and align with research and best practices. In 2009, the National Governors Association and the Council of Chief State School Officers designed and promoted the [Common Core State Standards](#) (also called the Common Core). The Common Core is a set of academic standards in mathematics and English language arts/literacy. Simply put, they are learning goals that outline what a student should know and be able to do at the end of each grade.

The goal of the Common Core is to ensure all students graduate from high school with the skills and knowledge necessary to succeed in college, career, and life, regardless of where they live. The standards are frequently referred to as “college and career readiness (CCR)” because they are designed to align with the entry level expectations of colleges, workforce training programs, and employers. As of 2014, 46 states, the District of Columbia, and four territories have voluntarily adopted and are moving forward with the Common Core.

In response to the K-12 content standards and CCR movement noted above, the GED® Testing Service and other HSE providers (existing and new) took immediate action to upgrade the rigor of their HSE assessments and align their test content with the college and career readiness content of the Common Core.

State Reactions to New HSE Content and HSE Alternatives

State adult education systems and other HSE delivery systems including Job Corps and non-government affiliated adult education providers, have reacted to the changes in the GED® test in a variety of ways and for a variety of reasons. Some states expressed concern that the cost of the new 2014 GED® test was too high or may not be stable over time. Other concerns included the sole use of a computer-based format and/or content that is too rigorous for many dropouts or adult immigrants. In some states, state legislation authorizing the use of the GED® test needed to be amended due to the changes in test ownership and the need for new GED® contract. Also, due to the magnitude of the GED® content changes, state level policy makers wanted to take a fresh look at options in order to endorse a single HSE test. These concerns led many states to rethink and redesign their HSE program delivery and options. While some states have finalized decisions on their HSE options, many states are currently working on their new policies and approaches.

State agencies that have authority over the state’s HSE delivery system, and more specifically the State Director of Adult Education in a state, typically initiated the concept of reviewing new HSE options within the state. Depending on a state’s adult education governance structure, changes to a state’s HSE system followed various final selection (of one or more HSE tests) and formal approval routes with some approvals being finalized at the state agency level while in other states approval was necessary from the state legislature. It should be pointed out that state endorsement of a particular HSE option may be different from the approved option on a Native American reservation within that state.

B. THE MOST COMMON HSE OPTIONS – GED® TEST, HISET, AND TASC

The three most common examinations used to determine high school equivalency are the General Educational Development (GED®) test, the High School Equivalency Test (HiSET), and the Test Assessing Secondary Completion (TASC). State adult education programs typically promote and endorse one or more of these approaches and offer a high school equivalency diploma that is officially sanctioned by the state in policy or law. [The National Adult Education Professional Development Consortium](#) (NAEPDC), a consortium of state directors of adult education, has developed a state-by-state listing of the HSE tests endorsed by each state. In addition, an enhanced state-by-state HSE matrix is included in this Guide with hyperlinks directly to state HSE websites.

As of January 1, 2015 March 14, 2014, there are 40 states committed to offering the [GED®](#) test (AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HA, ID, IL, KS, KY, MD, MI, MN, MS, NE, NV, NJ, NM, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WI, WY, and D.C.). Of those 40, 27 use the GED® exam as their only HSE option and 13 states provide multiple HSE options, either the [HiSET](#) or the [TASC](#). Although seven states are using the TASC, three states are using that option exclusively. Of the 12 states using the HiSET, seven are using that test exclusively. At the time of the survey, eight states that offer the GED® option exclusively were in the process of deciding on additional HSE options beyond the GED® exam.

B1. The 2014 GED®

Main web link: <http://www.gedtestingservice.com/ged-testing-service>

The GED® (general educational development) exam is a nationally recognized HSE test that is managed via a partnership between the nonprofit [American Council on Education](#) and the for-profit [Pearson](#) learning company. The GED® exam has been widely used since 1942 to provide out-of-school youth and adults with an opportunity to earn their high school equivalency credential in the U.S., Canada, and internationally. The test is aligned with current U.S. high school standards (including the [Common Core](#) standards) and [career and college readiness expectations](#).

Formerly only a paper-pencil test, the GED® exam is now (as of January 2014) delivered exclusively on computers. This provides a consistent testing experience nationwide. The computer-based testing format is not delivered through the Internet due to the need for a high level of security. There are four parts to the test: Reading through Language Arts, Mathematical Reasoning (two tests – one with a calculator, one without), and Science, and Social Studies. The GED® test offers two scoring levels, a minimum score needed to demonstrate high school equivalency and higher score level that demonstrates college and career readiness. The GED® test is normed on high school juniors and seniors. A passing score for the basic high school equivalency is established at the 40th percentile of the norming population.

In addition to English, the GED® tests are available in Spanish and French, large print, audio, and Braille. Tests and test preparation are also offered to persons incarcerated and on military bases in addition to more traditional settings. Individuals living outside the United States, Canada, or U.S. territories may be eligible to take the GED® test through Pearson VUE [testing centers](#).

The GED® testing service website features links designed specifically for different audiences, including students, educators, policy makers, media, and the public. Current research is featured on the website including detailed annual [statistical reports](#) that include state-by-state comparative data.

HSE Publishers Products for the 2014 GED®

Main web link: <http://www.gedtestingservice.com/educators/2014publishers>

The GED® Testing Service webpage includes information about 21 national publishers that offer instructional materials specifically for the 2014 GED® test. Web links and other contact information for each publisher are included as well as a notation as to which publishers offers the official GED® practice test. The website also includes links to individual product titles that a publisher has to offer.

GED® Test Acceptance

According to GED® Testing Service, “about 95 percent of U.S. colleges and universities accept GED® graduates in the same manner as high school graduates.” GED® graduates also qualify for federal student aid. Like high school graduates, GED® certificate holders need to complete any required admissions tests such as the ACT, SAT, or other placement and achievement tests required by the particular college. Also, four-year universities require high school course prerequisites be met if being admitted before completion of a community college transfer program.

Most colleges will accept a GED® certificate in lieu of a high school diploma, with community colleges almost always accepting GED® scores. However, a GED® certificate on its own may not be considered sufficient and should be combined with good references and tests scores in order to ensure college acceptance.

Source: Lisa Weinstein. [How do Colleges Look at a High School Diploma Vs. a GED®?](#) (March 2013)

B2. The HiSET

Main web link: <http://hiset.ets.org/>

The HiSET (High School Equivalency Test) test is a product of the [Educational Testing Service](#) (ETS) and [Iowa Testing Programs](#) (ITP). It was developed as an option to measure high school equivalency. The HiSET assesses the students’ ability to demonstrate their high school-level proficiency and their readiness for higher education or the workplace. The HiSET is available in both paper- and computer-delivered testing formats. It is administered at state-selected and operated test centers. Test takers are tested in five core areas: reading, writing, mathematics, science, and social studies. Test content is aligned with current practice in all states. Test takers can use existing prep courses and materials to prepare for the HiSET exam. Test takers are given scores in all core areas, as well as a total score.

Similar to the GED® test, the items that are included in the HiSET exam are pilot-tested, validated, and normed on graduating high school juniors and seniors. Item types include both multiple-choice and essay questions. Three

equated forms of the HiSET exam are available each calendar year to accommodate retakes. Scores are issued for each subtest and for the total battery. The passing standard is configured at the 40th percentile.

As of January 1, 2015, the following twelve states are using and supporting the HiSET: CA*, IA, LA, ME, MA, MO, MT, NV*, NH, NJ*, TN*, WY* (The asterisk denotes states that also offer and support the GED®. Also, CA, NV, NJ, and WY offer all three options – HiSET, GED®, and TASC).

HSE Publishers Products for the HiSET

Main web link: <http://www.newreaderspress.com/Items.aspx?hierId=9050>

[ProLiteracy](#)'s publishing division, [New Readers Press](#), offers three instructional products that are aligned to the HiSET. These materials include a set of pre-HSE workbooks, an HSE math workbook, and one set of instructional materials on visual literacy.

B3. The TASC

Main web link: <http://www.tasctest.com/>

The TASC (Test Assessing Secondary Completion) test was developed by [CTB/McGraw-Hill](#) as a national high school equivalency assessment. It assesses five subject areas including Reading, Writing, Mathematics, Science, and Social Studies. It measures examinees' levels of achievement relative to that of graduating high school seniors, and career and college readiness, as outlined by the Common Core state standards.

The TASC test can be taken at any state-approved testing site. It is available in both paper-and-pencil and online formats. TASC test items will gradually increase in depth of knowledge rigor over three years, 2014-2016, to gradually accommodate college ready content. Three TASC test forms are available each year, in English and Spanish, for paper-and-pencil and online tests. TASC's alternative forms include large print, Braille, and audio.

As of January 1, 2015, the following six states are using and supporting the TASC: CA*, IN, NV*, NJ*, NY, WV, WY* (the asterisk denotes states that also offer and support the GED® exam. Also, CA, NV, NJ, and WY offer all three options, the TASC, GED®, and HiSET.)

HSE Publishers Products for the TASC

Main web link: <http://www.newreaderspress.com/Items.aspx?hierId=9000>

[ProLiteracy](#)'s publishing division, [New Readers Press](#), offers four instructional products that are aligned to the TASC. These materials include a set of pre-HSE workbooks, a thinking skills workbook, a set of instructional materials on visual literacy, and a workbook of test taking strategies including two practice tests. The site also provides information about the required electronic calculator.

HiSET and TASC Acceptance

According to the HiSET and TASC publishers, colleges and universities within the states using the respective test acknowledge the equivalency diploma as a result of the diploma being sanctioned and issued by the state education authority. Since both of these HSE options are relatively new, states that have committed to their use have been and are taking actions to communicate information about their HSE option to colleges, universities, and employers.

Workforce System Implications for the GED® Test, HiSET, and TASC

Audience for these Implications – The move to multiple options for high school equivalency has implications for workforce agencies (within the public workforce system operating through the USDOL-ETA) and their stakeholders. This Guide provides information about HSE options for workforce system staff at both the state and local levels. In general, staff at the state level are encouraged to use this information to become informed about HSE changes and opportunities that are important to their roles as workforce system policy makers and program administrators. This Guide may be used to provide information and resources for local or regional workforce system staff as they manage day-to-day program services that target clients in need of HSE.

Service Delivery – Since many clients of the workforce system lack the necessary preparation for further education and employment, it is important for workforce system staff to know which HSE options are available and/or accepted (by postsecondary and employers) in their state. Options of available HSE examinations and preparation may have changed in recent months. Many clients in need of HSE will require assistance to connect with an HSE provider as well as assistance to determine which HSE option to pursue. For workforce system staff who operate HSE instructional programs, there is a need to know what instructional materials are available and/or recommended by the test publisher. Please note that a complementary College and Career Readiness (CCR) Guide is available on the same website as this HSE Guide.

Partnerships – Since workforce system staff and stakeholders frequently communicate, interact, and partner with adult education providers at the state and local levels, it is important to have knowledge about the options for HSE in their state. At the state level, every state maintains an adult education system (i.e., state administrative recipient of WIOA adult education funding) website. A directory of state adult education program is available on the adult education [state director organization website](#). State adult education websites in turn provide local directories of funded adult education providers which typically include adult schools, community based organizations, colleges, school districts, and prisons/jails. Typically, if a state endorses a specific HSE exam and provides preparation instruction, colleges and employers accept that credential. However, both colleges and employers have the individual freedom to accept or not accept any HSE credential or to add additional educational requirements to their enrollment or hiring criteria.

Professional Development – Workforce system staff would benefit from professional development to learn about the types of tests offered as well as the strengths and weaknesses of each test. For workforce system staff who work directly with HSE instructional staff, it would be useful to know where to find HSE curriculum and instructional resources. As noted in the section above, the test publisher provides links to curriculum and instructional materials on their website. The Need-to-Know checklist included in this Guide provides a template for information that may be included in professional development related to HSE.

Infrastructure – The delivery of HSE instruction and testing requires considerable infrastructure investments such as instructional and testing facilities, staff, and other delivery system basics. Although many workforce system organizations do not administer HSE instruction or testing, some do (e.g., Job Corps). Workforce system entities that do not administer HSE systems should understand how such systems work in their state or local areas and whether or not there are infrastructure barriers such as lack of testing centers or facility accommodations for persons with disabilities. The [Jobs Accommodation Network](#), sponsored by USDOL, is a resource for learning about workplace accommodations regarding infrastructure and policy issues.

Checklist of “Need-To-Know” Information

The checklist below includes recommendations for essential knowledge about the three major HSE options: GED® exam, HiSET, and TASC. The checklist uses a question format. Some of the more basic items are answered in the preceding text in this section while other need-to-know information, especially at the local level, may be attained by following the hyperlinks noted in this Guide or by contacting your local HSE experts (e.g., adult education providers). The checklist is separated by two levels of workforce system staff – state and local. Many of the checklist items are similar, but the scope of information may vary between the state (broader knowledge) and the local (more specific information) level.

Need-To-Know Checklist for the GED® Test, HiSET, and TASC

For **State Level** Workforce System Staff and Stakeholders

- ✓ ***Why is HSE important from an economic perspective – to the state, to the nation, and to the individual?***

Rationale: An understanding of the economic benefits of HSE clarifies the value of HSE to an individual as well as to a community, state and nation.

- ✓ ***What are the demographics for your state with regard to high school diploma/equivalency attainment? How do these compare to the nation? How does HSE data differ by subgroup (e.g., minority populations, incarcerated, age levels)?***

Rationale: Understanding these demographics reveals needs or gaps in HSE services.

- ✓ **What are the three most popular options for HSE attainment and what options are available in the U.S. and in your state?**

Rationale: States vary in HSE options – see state-by-state HSE listing in Section E.

- ✓ **What do neighboring states use for HSE? Does your state recognize/accept those HSE types?**

Rationale: Understanding neighboring state HSE options is helpful when planning for or providing HSE services to clients in your state.

- ✓ **How accepted (by employers and postsecondary institutions) are HSE credentials in your state?**

Rationale: Understanding the level of acceptability or recognition by employers and postsecondary institutions in your state is helpful to determine the level of HSE promotion and services by workforce service providers.

- ✓ **Does the test align with the high school standards used by our state?**

Rationale: States differ in the degree of alignment between HSE tests and K-12 adopted standards. Knowing your state’s degree of alignment is helpful when promoting HSE.

What to know about each test in your state:

- ✓ **Who (agency) administers the test(s) at the state level and who provides the HSE credential?**

Rationale: States differ as to which state agency is responsible for HSE issuance. Understanding this for your state is important for HSE information access and for partnership or collaboration purposes.

- ✓ **How is the test administered? Who manages the testing center process?**

Rationale: Understanding the testing process is helpful for referring clients to HSE testing centers and providing information to clients about testing expectations.

- ✓ **What content area subtests are included?**

Rationale: Understanding the HSE subtest array is helpful to provide general information to clients about what to expect or what to prepare for as they consider attempting an HSE exam.

✓ **What accommodations are available for special needs conditions or populations?**

Rationale: Understanding the accommodations types and accommodations request processes is helpful to assist and inform special needs clients. Also see Section F in this Guide.

✓ **How do students in our state perform (i.e., passing rates) on the test?**

Rationale: Understanding state HSE performance levels reveals needs and gaps in the HSE process.

For **Local Level** Workforce System Staff and Stakeholders

✓ **Why is HSE important from an economic perspective – to the state, to the local area, and to the individual?**

Rationale: An understanding of the economic benefits of HSE clarifies the value of HSE to an individual as well as to a community, state and nation.

✓ **What are the demographics for your state and your local geographic area with regard to high school diploma/equivalency attainment? How does your area compare with the state? How does HSE data differ by subgroup (e.g., minority populations, incarcerated, age levels in your local area)?**

Rationale: Understanding these demographics reveals needs or gaps in HSE services.

✓ **What HSE test options are available to your clients?**

Rationale: States vary in HSE options – see state-by-state HSE listing in Section E. Workforce staff need to know what is valued in the state/region/area.

✓ **Where is HSE preparation provided in your area and where is testing conducted? Are there any access issues with regard to preparation or testing?**

Rationale: Knowing the location of HSE testing centers and the access logistics is important for client general information and referral purposes.

✓ **How accepted (by employers and postsecondary institutions) are HSE credentials in your local area?**

Rationale: Understanding the level of acceptability or recognition of specific HSE tests by employers and postsecondary institutions in your state is helpful to determine the level of HSE promotion and services by workforce service providers.

✓ **Does the test align with the high school standards used by the high schools in your area?**

Rationale: States differ in the degree of alignment between HSE tests and K-12 adopted standards. Knowing whether or not the HSE exam aligns with local high school standards and curricula is helpful for understanding any differences between the regular high school diploma and the HSE credential used in your state.

What to know about each test used in your state:

✓ ***Who (agency) administers the test(s) at the state and at the local level and who provides the HSE credential?***

Rationale: Understanding this for your state is important for HSE information access and for partnership or collaboration purposes.

✓ ***How is the test given? Who manages the testing center process?***

Rationale: Understanding the testing process is helpful for referring clients to HSE testing centers and providing information to clients about testing expectations.

✓ ***What content area subtests are included?***

Rationale: Understanding the HSE subtest array is helpful to provide general information to clients about what to expect or what to prepare for as they consider attempting an HSE exam.

✓ ***What accommodations are available for special needs conditions or populations?***

Rationale: Understanding the accommodations types and accommodations request processes is helpful to assist and inform special needs clients. Also see Section F in this Guide.

✓ ***What is the test cost to the student and how does the cost of the test impact students in general?***

Rationale: Understanding the cost of the test to students and the impact of the test cost to students in general provides helpful information relating to workforce program funding issues where HSE is a component.

✓ ***How do business and employers view the credibility of the test(s) used in this state?***

Rationale: Understanding how the selected test is viewed by the business community and employers in your state is critically important to serving workforce system clients that are seeking HSE.

✓ ***How long does it take on average to prepare and complete (pass all subtests) the HSE test?***

Rationale: Understanding the typical HSE timeframe is helpful for client advising and HSE planning.

✓ ***How is the test scored and what are the minimums for passing?***

Rationale: Understanding the scoring process and minimum passing scores is helpful for interpreting client HSE results and assisting them with further educational plans.

✓ ***How long does it take on average to prepare and complete (pass all subtests) the HSE test?***

Rationale: Understanding the typical HSE timeframe is helpful for client advising and HSE planning.

✓ ***If there are multiple HSE options in our area, how do we determine which option to recommend to a client?***

Rationale: Learning about the options available (through the HSE administering agency) and pros and cons regarding each option, will be helpful in advising clients about selecting their best HSE option. For workforce system staff that wish to advise clients as to their “best” HSE option, it is recommended that the workforce system staff seek information and advice from their adult education HSE professional within their geographic area.

The answers to many frequently asked HSE questions are found on the following test publisher

FAQ Sites: GED® [FAQ](#) HiSET [FAQ](#) TASC [FAQ](#)

C. REQUESTING AND INTERPRETING SCORES ON THE GED® TEST, HISET, AND TASC

Test scores are established by the test developer using psychometric processes and norming techniques. In order to establish high school equivalency minimum passing scores on each subtest, the test developers administer tests to high school seniors and set the “cut score,” or minimum passing score, at a point at which approximately 40 to 45 percent of the norming group would not pass. For example, if the cut score is set at the 45th percentile on the norming group, it means that in order to pass the HSE subtest an examinee would have scored at or better than 45 percent of the representative high school students in the norming group. Attaining a score at or higher than the minimum cut score is interpreted by the test developers to be “high school equivalent.”

The following table identifies each subtest of the three popular HSE tests and identifies the publisher’s recommended minimum score necessary for passing each subtest. Although most do not, individual states do have the flexibility to set higher passing scores. The GED® 2001-2013 is included in this table since many examinees have taken this earlier version of the GED® test. The HiSET and the GED® test both feature a second minimum score that is higher than the minimum passing score for high school equivalency (coded in **red** below). It represents a score above which an examinee is considered college and career ready. For example, if an examinee scores 15 or above on the HiSET math test, they are not only considered high school equivalent in math, they are considered ready for college math.

High School Equivalency Test	Language Arts Reading	Language Arts Writing/ Reasoning through Language Arts	Math	Science	Social Studies	Minimum Subtest Score and (College and Career Readiness (CCR) Subtest Minimum Score)	Minimum Total Battery Score Needed To Pass and (CCR Score)	Maximum Subtest Score Possible
HISET	X	X	X	X	X	8 (15)	45 (75)	20
GED® 2001-2013	X	X	X	X	X	410 (500)	2250 (2500)	800
GED® 2014		X	X	X	X	150 (170)	600 (680)	200
TASC	X	X	X	X	X	500	2500 (na)	800

Additional score information on the GED® 2014 test – The new GED® 2014 test forms do not specify numbers of test questions. They are based on raw score points instead, since items are no longer worth just one point each. The final raw score point totals are as follows:

- Reasoning Through Language Arts – 65 raw score points
- Mathematical Reasoning – 49 raw score points
- Science – 40 raw score points
- Social Studies – 44 raw score points

Scores from the 2014 GED® test are transformed to a common scaled score metric, to make the scores easier to use and interpret across the content areas. The 2014 scale runs from 100 to 200, with 150 scaled score points as the Passing Standard for high school equivalency and 170 scaled score points as the GED® Score with Honors, reflective of readiness for career and college.

Additional score information on the TASC – The passing score is 500 for each TASC test subject area with the additional requirement to score at least two out of eight on the Writing prompt to pass Writing. Students pass the TASC test overall when they have passed each of the five subject area tests.

Although the TASC considers its established minimum score an indicator of college and career readiness, the developers have announced that over the next three years, TASC will offer increased coverage of college and career readiness standards by using additional item types, including constructed-response items and technology-enhanced items. Automated essay scoring will be introduced in 2016. The purpose of this transition is to allow educators to gradually adjust their teaching methods as they align with college and career readiness standards.

Additional score information for the HiSET – The HiSET offers examinees a Comprehensive Score Report that contains the following information:

- Examinee contact information (name) and ID number
- Report and test date(s)
- Whether or not examinees have taken all five HiSET subtests and, if so, whether the examinee has met the three HiSET passing criteria:
 - Scored at least eight out of 20 on each subtest
 - Scored at least two out of six on the essay
 - Achieved a total scaled score on all five HiSET subtests of at least 45 out of 100
- A cumulative record of the examinees highest scaled score for each subtest

Requesting Test Scores for the GED® Test, TASC, and HiSET – Examinees receive their test scores through electronic or regular mail processes shortly after taking a test. This time varies by test publisher, but typically occurs within a few business days. Examinees may request duplicate copies of their test scores or transcripts through the website of the respective test publisher or through the state agency that serves as the administrative agent of the test. Examinees may request transcripts or they may request (from the state agent only) duplicate copies of the HSE diploma. However, each state establishes policies as to the process for the request and for any fees for the service.

[The GED® Testing Service website for transcript requests](#) includes links to individual state administrative agencies that handle transcript or diploma requests. However, the GED® testing service has a process called the [Parchment Exchange](#) for third parties to request GED® transcripts on behalf of individuals. The third party must have proof of consent from the examinee.

Both the [HiSET score explanation website](#) and the [TASC score explanation website](#) asks individuals to contact the state administering agency for processes for receiving transcripts and diplomas and points out that each state that offers their test has established its own transcript and diploma requesting policies and fees. Third party requests for HiSET or TASC transcripts are also handled directly through the administering state agency. See Section E below for website links to each state administering agency for the HiSET and the TASC.

Workforce System Implications for Requesting and Interpreting HSE Test Scores

Workforce system clients who have attained HSE will have test scores in their educational background records. It would be beneficial for workforce system personnel to be able to interpret HSE scores to gain an understanding of the level of performance and the content areas of strengths and weaknesses. A thorough understanding of the client's educational record would assist service delivery efficiency and outcomes. In addition, a basic understanding of HSE scoring could be a part of professional development for workforce system personnel. Workforce system personnel who wish to access or to be able to view client HSE transcripts are advised to contact the state agency that administers the HSE exam to learn about that state's unique process and policies regarding access to HSE scores.

Need-To-Know Checklist for Interpreting HSE Test Scores

For **State Level** Workforce System Staff and Stakeholders

- ✓ ***What is a passing score on the HSE test(s) used in this state?***
- ✓ ***What is a “good” score, or top score on the HSE test(s) used in this state?***
- ✓ ***In this state, are actual HSE scores important to our major employers and/or to our colleges?***

Rationale: Knowing basic information about HSE scores is important for a general understanding of the specific HSE test(s) used in your state. Additionally, determining if actual scores matter to major employers or colleges reveals the degree to which high scores are important to value and promote for clients.

For **Local Level** Workforce System Staff and Stakeholders

- ✓ ***What is a passing score and a “good” score on the HSE test(s) used in this state?***
- ✓ ***Are actual HSE scores important to the major employers or colleges in my local area?***
- ✓ ***How will an understanding of HSE test scores (e.g., strengths and weaknesses) help me assist a client with referrals to further education or employment?***

Rationale: Knowing basic information about HSE scores is important for a general understanding of the HSE test(s) used in your state, regional and local areas. Determining if actual scores matter to major employers or colleges reveals the degree to which high scores on HSE tests are important to value and promote for clients. Also, understanding the range of scores possible would be helpful to assist clients with discussions or referrals to further education or employment.

D. OTHER HSE OPTIONS – MULTI-STATE, SINGLE STATE, AND ONLINE

In addition to the three major HSE exams (GED® test, HiSET, and TASC) being used in all 50 states, a handful of states have endorsed other alternative HSE processes or exams. These other options are noted below along with a brief description of the student progress reporting system, the National Reporting System (NRS), that is required for all adult education programs funded through AEFLA of the Workforce Innovation and Opportunity Act. Also, the information in this section concerning online high school credential programs may be helpful to workforce system personnel who have questions about the availability or credibility of such diplomas.

D1. Multi-State Options

D1a. The National External Diploma Program

Main web link: <http://www.casas.org/nedp>

The National External Diploma Program (NEDP) is an applied performance assessment system that assesses the high school level skills of adults and out-of-school youth. The NEDP evaluates the reading, writing, math, and workforce readiness skills of participants in life and work contexts. Administered by the Comprehensive Adult Student Assessment System (CASAS), it is currently available in 76 agencies located in six states (CT, MD, NY, RI, VA, WA) and the District of Columbia. In addition to the basic skills test components, the NEDP includes self-assessments in career interests and skills required for transition to postsecondary education and employment. HSE diplomas may be awarded by the state or by an individual school district.

D1b. The National Migrant Education High School Equivalency Program

Main web link: <http://www2.ed.gov/programs/hep/index.html>

The Migrant Education High School Equivalency Program (HEP) helps migratory and seasonal farm workers (or children of such workers) who are 16 years of age or older and not currently enrolled in school to obtain the equivalent of a high school diploma and, subsequently, to gain employment or begin postsecondary education or training. The program serves more than 7,000 students annually. HEP participants receive developmental instruction and counseling services intended to prepare them to complete a GED® test or other HSE test as well as assisting students to enroll in postsecondary education. The major support services offered through HEP are counseling, job placement, health care, financial aid stipends, housing for residential students, and cultural and academic programs.

D2. State or Locally Developed HSE Options

There are a number of HSE options that are in limited use nationally or at the state level. States such as CA, VT, HA, and WI have developed HSE options for at risk populations and dropouts that reflect their state content standards. Also, some independent school districts offer competency-based HSE options for students in dropout prevention programs or for recent dropouts. These local district HSE options are typically endorsed by the district board of education. They are available only to individuals in that district. Finally, there are a number of nationally

advertised online HSE options available commercially or at no charge to the client. It is important to note that some of the online commercial options may be either fraudulent and/or not recognized by postsecondary institutions or employers.

Below are resource links to a variety of these national, state, and local options.

D2a. The California High School Proficiency Examination (CHSPE)

Main web link: <http://www.chspe.net/>

The CHSPE is a test established in state law for students who need to verify high school level skills. Those who pass the test receive a Certificate of Proficiency from the State Board of Education, which is equal by law to a California high school diploma. People who are 16 years of age or older may take the test, while younger people who meet other criteria may also be able to take the test. This test is given three times each year at many sites in California. The test covers three subjects: reading, writing, and math. There is a fee to take the test. Although federal agencies are not bound by state laws, the U.S. Office of Personnel Management has ruled that the Certificate of Proficiency shall be accepted in applications for federal civilian employment. The U.S. Department of Education and Federal Student Aid recognizes the CHSPE as the equivalent of a high school diploma in applications for federal financial aid. All persons and institutions subject to California law that require a high school diploma for any purpose must accept the certificate as satisfying the requirement.

D2b. Vermont Adult Diploma Program

Main web link: <http://education.vermont.gov/adult-education/transcripts>

The Vermont Adult Diploma Program (ADP) is designed specifically for adults with experience in meeting family and work responsibilities. ADP works best with adults age 20 or older who have been out-of-school for several years. Individuals 18-19 years of age can enroll with a placement form from the ADP assessor in their local center. Students can work at their own pace and at a location convenient to them, tailor assignments to fit with their own experiences and needs, and receive individualized feedback and support from the ADP assessor. The process requires students to complete performance-based projects to demonstrate performance standards that align with the EFF Content Standards and the Vermont Framework of Standards.

D2c. Hawaii Competency-Based Community School Diploma (HCBCSD)

Main web link: <http://wahcs.leilehua.k12.hi.us/geninfo/geninfo/cbprogram.html>

The Competency-Based High School Diploma Program, approved by the Hawaii Board of Education, provides adults who do not have a high school diploma with a valid option to obtain a Hawaii Community School Diploma through the community schools for adults. The purpose of the CBCSDP is to enable adult learners to become functionally literate adults, productive and contributing citizens/community members, effective family members, and productive workers. The curriculum is aligned to the adult learner standards: [Equipped for the Future](#), and the [CASAS](#) Life and Work competencies. The contextual activities are designed to help adults become functionally

competent individuals within the following units: Community Resources, Government and Law, Consumer Economics, Health, and Occupational Knowledge.

D2d. Wisconsin High School Equivalency Diploma

Main web link: <http://ged-hsed.dpi.wi.gov/>

Wisconsin provides five options to adults over 18 who do not have a high school diploma. These options include: 1) Pass the GED® tests; complete the health, citizenship, and employability skills and career awareness counseling requirements; 2) Document 22 high school or college credits; 3) Finish 24 semester credits or 32 quarter credits at a university or technical college, including instruction in any area of study they did not cover in high school; 4) Complete a foreign degree or diploma program; and 5) Complete a competency program offered by a technical college or community-based group that has been approved by the state superintendent of public instruction as a high school completion program.

D2e. Online HSE programs

An internet search for online high school diploma options will reveal many options, most of which are fee-based. However, a few online options are offered by public institutions at little or no cost to the client. Determining the legitimacy of an online HSE program is necessary to ensure the high school diploma will be accepted by postsecondary institutions and/or employers. One important tool for determining authenticity is checking a program's accreditation from a [reputable school accreditation agency](#). A second verification method is to research the program through the national or local [Better Business Bureau](#).

Two recent articles describing the process for verifying the legitimacy of online HSE programs may be reviewed at: <http://www.scambook.com/blog/2012/08/5-myths-about-getting-your-online-ged-or-high-school-diploma/> and <http://blog.ecollegefinder.org/2013/05/09/online-high-school-diploma-or-ged-legitimate/>.

Workforce System Implications for Other HSE Options

Workforce system personnel who serve clients without high school diplomas should be familiar with all state-endorsed alternative HSE programs available in their state. The matrix of state HSE options located in Section E of this Guide, identifies which states are using options in addition to the GED® test, HiSET, and TASC. The summary information in this section could be adapted for use in professional development for workforce system staff and stakeholders. Additionally, both state and local level workforce system personnel and stakeholders should become familiar with the student and program performance measures within that system.

Need-To-Know Checklist for Other HSE Options

For **State Level** Workforce System Staff and Stakeholders:

- ✓ ***What alternative HSE options (other than GED®, TASC, or HiSET) are in use in your state?***

Rationale: Knowing the complete array of available HSE options would be helpful in planning and implementing HSE services or providing client guidance.

- ✓ ***How accepted (by employers and postsecondary institutions) are these other HSE credentials in your state?***

Rationale: Understanding the level of acceptability or recognition of specific HSE tests by employers and postsecondary institutions in your state is helpful to determine the level of HSE promotion and services by workforce service providers.

- ✓ ***What is the relationship between these other options and college and career readiness standards?***

Rationale: Knowing the degree to which these other HSE options align with the state's college and career readiness K-12 or adult education standards is helpful for determining whether or not to promote those options.

- ✓ ***Are any credible online high school diploma options available in your state?***

Rationale: Understanding which online high school diploma options are credible is helpful to promote the credible options and advise against and recognize fraudulent HSE options.

- ✓ ***What outcomes are measured under the adult education National Reporting System (NRS)? How is HSE reported under that system?***

Rationale: Understanding how HSE is measured and reported within WIOA and specifically within the adult education system is helpful for program collaboration purposes.

For **Local Level** Workforce System Staff and Stakeholders:

- ✓ ***What alternative HSE options (other than GED®, HiSET, or TASC) are in use in your state and in local area?***

Rationale: Knowing the complete array of available HSE options would be helpful in planning and implementing HSE services and providing client guidance.

- ✓ ***How accepted (by employers and postsecondary institutions) are these other HSE credentials in your area?***

Rationale: Understanding the level of acceptability or recognition of specific HSE tests by employers and postsecondary institutions in your local area is helpful to determine the level of HSE promotion and services by workforce service providers.

✓ ***What is the relationship between these other options and college and career readiness standards?***

Rationale: Knowing the degree to which these other HSE options align with the state's college and career readiness K-12 or adult education standards is helpful for determining whether or not to promote those options in your local area.

✓ ***Are any credible online high school diploma options available for my clients?***

Rationale: Understanding which online high school diploma options are credible is helpful to promote the credible options and advise against and recognize fraudulent HSE options.

✓ ***Who (agency) administers these test(s) at the local level and who provides the HSE credential?***

Rationale: Knowing which organizations administer these tests and who provides the credential is helpful in the client referral process.

✓ ***What content area subtests are included?***

Rationale: Understanding the content covered by these HSE options is important to client guidance.

✓ ***What accommodations are available for special needs conditions or populations?***

Rationale: Understanding the accommodations types and accommodations request processes is helpful to assist and inform special needs clients. Also see Section F in this Guide.

✓ ***How do individuals in your local area perform (e.g., passing rates) on these HSE options and how does that compare to the state or national performance data?***

Rationale: Understanding the performance comparisons is helpful to judge the value of the HSE options for your clients.

✓ ***What outcomes are measured under the adult education National Reporting System (NRS)? How is HSE reported under that system?***

Rationale: Understanding how HSE is measured and reported within WIOA and specifically within the adult education system is helpful for program collaboration purposes.

E. MATRIX OF HIGH SCHOOL EQUIVALENCY STATE WEBSITES

The following listing provides a web link to each state’s HSE options. For example, California offers four different HSE options while Arkansas only offers the GED® test. Many state HSE websites (e.g., New York) provide considerable detail about the test, the testing process, professional development opportunities, and other relevant information, while other state websites provide basic summary information and encourage the user to contact local adult education providers or state-authorized testing centers. An OTHER category has been included to highlight HSE options that are either unique to the state (not available nation-wide) or offered only within specific geographic locations within a state. The latter scenario pertains to the six states (and Washington DC) that offer the National External Diploma Program (NEDP). As an option to high school equivalency exams, it should be noted that many states allow local school districts or state-supported adult education centers to offer high school credit make-up classes for out-of-school youth and adults who have only a small number of credits to pass in order to receive their regular K-12 high school diploma from a cooperating school district.

The chart below is a snapshot of high school equivalency options as of **January 1, 2015**. Some states including NC, TX, HA, VA, and WY (and possibly others) have initiated formal processes which could lead to changes in the HSE options their state supports. The reader is encouraged to contact their state adult education agency for the most up-to-date information. Please note that the test names for each state are hyperlinked to that state’s website for HSE.

STATE	GED®	HiSET	TASC	OTHER
ALABAMA	GED®			
ALASKA	GED®			
ARIZONA	GED®			
ARKANSAS	GED®			
CALIFORNIA	GED®	HiSET	TASC	CHSPE
COLORADO	GED®			
CONNECTICUT	GED®			CT-NEDP
DELAWARE	GED®			
FLORIDA	GED®			
GEORGIA	GED®			
HAWAII	GED®			HCBCSD
IDAHO	GED®			
ILLINOIS	GED®			

STATE	GED®	HiSET	TASC	OTHER
INDIANA			TASC	
IOWA		HiSET		
KANSAS	GED®			
KENTUCKY	GED®			
LOUISIANA		HiSET		
MAINE		HiSET		
MARYLAND	GED®			MD-NEDP
MASSACHUSETTS		HiSET		
MICHIGAN	GED®			
MINNESOTA	GED®			
MISSISSIPPI	GED®			
MISSOURI		HiSET		
MONTANA		HiSET		
NEBRASKA	GED®			
NEVADA	GED®	HiSET	TASC	
NEW HAMPSHIRE		HiSET		
NEW JERSEY	GED®	HiSET	TASC	
NEW MEXICO	GED®			
NEW YORK			TASC	NY-NEDP
NORTH CAROLINA	GED®			
NORTH DAKOTA	GED®			
OHIO	GED®			
OKLAHOMA	GED®			
OREGON	GED®			
PENNSYLVANIA	GED®			
RHODE ISLAND	GED®			RI-NEDP

STATE	GED®	HiSET	TASC	OTHER
SOUTH CAROLINA	GED®			
SOUTH DAKOTA	GED®			
TENNESSEE	GED®	HiSET		
TEXAS	GED®			
UTAH	GED®			
VERMONT	GED®			VT-ADP
VIRGINIA	GED®			VA-NEDP
WASHINGTON	GED®			WA-NEDP
WEST VIRGINIA			TASC	
WISCONSIN	GED®			WI-HSED
WYOMING	GED®	HiSET	TASC	
WASHINGTON DC	GED®			DC-NEDP

Workforce System Implications for the HSE Matrix

The matrix included above provides a snapshot of state-endorsed HSE options being used in each state. The tests are hyperlinked directly to the state website that manages the specific test. Workforce system personnel and stakeholders at all levels could use this tool as a quick reference to their state's HSE processes. In addition, if workforce system staff serve clients who reside, work, or attend school in bordering states, the matrix would be helpful to understand HSE processes in the neighboring states.

Need-To-Know Checklist for the HSE Matrix

For **State Level** Workforce System Staff and Stakeholders

✓ **What HSE options are available in your state and bordering states?**

Rationale: Understanding the HSE options that are available in your state is important for establishing policy for or providing guidance to clients regarding their HSE options, content, and test center logistics. Understanding HSE options available in neighboring states supports the concept of regional economies (common industry sectors and employment that cross state borders) as promoted under WIOA. In places where there is more than one testing option workforce staff

would benefit from understanding the nuances and reputation of the different tests to help their clients make informed decisions about which test to pursue.

For **Local Level** Workforce System Staff and Stakeholders

✓ ***What HSE options are available in your state and bordering states?***

Rationale: Same as above.

F. ACCOMMODATIONS ON THE GED® TEST, HISET, AND TASC

Accommodations for Individuals with Disabilities – In compliance with the Americans with Disabilities Act, as amended in 2008, the three most widely used HSE examinations—GED® test, HiSET, and TASC—provide test taking accommodations for individuals with disabilities. These accommodations typically involve test taking modifications, accessible test formats, and allowable resources. As noted below, the processes for requesting and obtaining permission for accommodations vary with each test provider. In addition, testing accommodations for incarcerated individuals are often necessary due to their lack of Internet or computer access and are described below.

Accommodations for Spanish Speaking Individuals – All three HSE tests—GED® exam, HiSET, and TASC—offer a Spanish language version of their test. It should be noted that individual states have varying policies and guidelines regarding their support and value of a high school equivalency earned in Spanish. For example, some states (e.g., Minnesota) allow the Spanish GED® test to be offered to examinees, but they do not allow their funded adult education providers to provide Spanish GED® instructional or preparatory services.

F1. GED® Accommodations

For Persons with Disabilities

Main web link: <http://www.gedtestingservice.com/testers/accommodations-for-disability>

The GED® Testing Service provides accommodations to individuals with documented disabilities who demonstrate a need for accommodations. GED® test accommodations may include things such as a separate testing room, extra testing time, or extra breaks. Accommodations do not include testing on a paper-pencil format.

Test accommodations are individualized and considered on a case-by-case basis. Students requesting an accommodation must establish a [registration account](#) with the GED® Testing Service, complete a request form, and provide [medical documentation](#) to support their request. Accommodation request forms are available for a specific set of disabilities and reasons that include:

[“Intellectual Disabilities” \(ID\)](#)

[“Learning and Other Cognitive Disabilities” \(LCD\)](#)

[“Attention Deficit Hyperactivity Disorder” \(ADHD\)](#)

[“Psychological and Psychiatric Disorders” \(EPP\)](#)

[“Physical Disorders and Chronic Health Conditions” \(PCH\)](#)

[“Request for Testing Accommodations Appeal”](#)

[“Request for Extension”](#)

[“Transfer from PBT to CBT Request”](#)

The GED® Testing Service recommends that additional supporting documentation is included with the request. Examples include:

- School records that show participation in special education services
- Individualized Education Program (IEP) description
- Transcripts from middle school or high school
- Other records that show a history of academic difficulties due to a disability

For English Language Learners

The GED® test is available in Spanish and French. Scores from the Spanish-language and French-language versions of the GED® tests may be combined with scores from any English-language version of the GED® test. However, individual states have the option to decide whether to combine scores. Also, the GED® Testing Service has established a website that allows students to sign up, schedule, and check their scores in English or Spanish using [MyGED™](#) at GED.com.

F2. HiSET Accommodations

For Persons with Disabilities

Main web link: <http://hiset.ets.org/take/disabilities/>

Accommodations are available for test takers with diagnosed disabilities that include, but are not limited to:

- Attention deficit/hyperactivity disorder
- Psychological or psychiatric disorders
- Learning and other cognitive disabilities
- Physical disorders/chronic health disabilities
- Intellectual disabilities
- Hearing and visual impairment

Many different types of accommodations are available for both the HiSET computer-based test and the HiSET paper-pencil test. Examples of accommodations include extended time, separate testing room, recorded audio, large print, screen magnification, talking calculator, scribe or keyboard entry aide, additional break time, and sign language interpreters.

Test takers requesting any accommodations must use the [HiSET Testing Accommodations Request Form](#) and [register](#) by mail through ETS Disability Services and have their accommodations approved before their test can be scheduled. Test takers requesting accommodations cannot schedule an appointment through their HiSET account. They must contact ETS Disability Services to schedule an appointment. HiSET has established specific criteria for documenting disabilities that require test accommodations. Those policies and instructions are available on a separate HiSET [policy webpage](#).

For English Language Learners

The HiSET is available in Spanish. Also, general information about the HiSET is available on the [HiSET Bulletin](#) webpage.

F3. TASC Accommodations

Main web link: <http://www.tasctest.com/special-needs-accommodations.html>

Accommodations and other test taking supports are available for TASC test takers. The following three supports or accommodations are available:

Special Testing Accommodations: Special testing accommodations, such as extra time, are intended to account for the effects of a person's disability. Special accommodations are only approved for examinees with appropriate documentation diagnosing their disability or disorder and supporting the need for specified accommodations. The examinee must submit a completed TASC Test Special Testing [Accommodations Request Form](#) to CTB/McGraw-Hill in advance of the scheduled test date.

Allowable Resources: Tools, procedures, and materials that an examinee may use to support test taking include items such as earplugs, magnifying glasses, or seat cushions. No formal approval is required for the use of allowable resources. In some cases a notification form must be filled out and provided to the testing center prior to testing so that the testing center can prepare to support the request.

Alternate Formats: TASC test is available in English and Spanish in alternate formats including Braille and large print editions. To receive alternate formats, the examinee must provide prior notification to the testing center.

Workforce System Implications for GED® Test, HiSET, and TASC Accommodations

Each of the three most popular HSE exams includes processes for accommodating clients as required by law. All workforce system personnel should be familiar with the availability of accommodations for HSE in order to provide clients with opportunities for success and be advocates for their clients' needs. Understanding the accommodations available through the GED® test, HiSET, and TASC, could be attained through professional development opportunities that focus on HSE accommodations and typically available through the state adult education agency. Two workforce related resources for information and/or professional development on accommodations are the [Jobs Accommodation Network](#), sponsored by USDOL, and the [National Collaborative on Workforce and Disability](#).

Need-To-Know Checklist for GED®, HiSET, and TASC Accommodations

For **State Level** Workforce System Staff and Stakeholders

- ✓ *What accommodations are available for the HSE test(s) used in your state?*
- ✓ *Are the HSE tests in your state available in languages other than English?*
- ✓ *Under what circumstances would clients benefit from achieving HSE in a language other than English?*

Rationale: Understanding the available accommodations for all test takers including individuals with disabilities and for individuals who speak languages other than English is helpful for directing client guidance and referral services. Also, it would be helpful to know how successful clients are that receive HSE accommodations.

For **Local Level** Workforce System Staff and Stakeholders

- ✓ *What accommodations are available for the HSE test(s) used in your state and area?*
- ✓ *Are the HSE tests in your local area available in languages other than English?*
- ✓ *What are the pros and cons of providing an HSE option in a language other than English?*
- ✓ *What levels of success do clients with disabilities have on the HSE tests used in your area?*

Rationale: Same as above.

G. HSE TESTING IN CORRECTIONAL SETTINGS

Studies have shown that about two-thirds of prison inmates across the nation do not have high school diplomas upon entry into a correctional institution. Most state-operated prisons in the U.S. offer high school equivalency instruction for inmates and HSE testing occurs on site.

The benefits of obtaining an HSE prior to release have been documented in various recidivism studies. In a 2003 study, [The Effect of Earning a GED® on Recidivism Rates](#), inmates who earned their GED® diploma while incarcerated returned to custody within three years at a significantly lower rate than offenders who did not earn a GED® diploma while incarcerated. The relationship between GED® attainment and return-to-custody is particularly strong among offenders who were under age 21 at release.

For states that use the GED® test for high school equivalency, most of their correctional institutions are now offering the GED® test on computers. Within some institutions, however, a waiver has been granted through the GED® Testing Service to continue to use the 2002 paper-pencil GED® test while those institutions upgrade their computer infrastructure. Although these waivers are being phased out, correctional institutions may continue to negotiate with the GED® Testing Service for permission to use the 2002 GED® test.

Computers are required in order to take the GED® test in correctional settings, but access to the Internet is not required. The actual GED® test and [practice test](#) are downloadable to computers and laptops in correctional settings. Also, there is an offline version of the GED® test tutorial that was designed for use in these circumstances. More specific information about the use of the GED® exam in corrections and links to related GED® resources are available online at: <http://www.gedtestingservice.com/educators/2014corrections>

The TASC and the HiSET websites do not provide specific information about the use of their tests at correctional settings. However, both tests may be used at state-approved testing centers which typically include jails and prisons. All states that are using the TASC or the HiSET are currently offering the test at their correctional facilities that have been state-approved for test administration.

Workforce System Implications for HSE in Correctional Settings

Research shows that a large percentage of individuals entering jails and prisons do not have an HSE credential and that if obtained while incarcerated, these individuals have a greater likelihood of success once released. The workforce system routinely serves clients upon release from incarceration and often partners with prisons and jails on reentry programming. It would be important for workforce system personnel to understand the HSE options provided in correctional settings and to advocate for HSE programming in these settings.

Need-To-Know Checklist for HSE in Correctional Settings

For **State Level** Workforce System Staff and Stakeholders

✓ ***What HSE test(s) and preparation opportunities exist in your states' correctional institutions?***

Rationale: States vary in the ways in which HSE exams are administered within correctional settings. States also vary in the way they are served through the Adult Education and Family Literacy Act.

✓ ***How are these tests delivered in these settings?***

Rationale: Understanding how your state's prison system or local county/city jails administer HSE exams and which HSE options they offer is helpful for workforce system staff that collaborate or partner with correctional systems.

✓ ***Are there opportunities to partner with state correctional institutions authorities on HSE programming?***

Rationale: Most state correctional institutions operate HSE programs and would benefit from collaborations and discussions with workforce system staff regarding reentry issues and opportunities for inmates.

✓ ***What are the benefits of obtaining HSE while incarcerated?***

Rationale: Knowing the benefits of obtaining HSE while incarcerated is important when determining the scope of collaborative services with correctional partners.

For **Local Level** Workforce System Staff and Stakeholders

✓ ***What HSE test(s) and preparation opportunities exist in the correctional institutions in your local area?***

Rationale: States vary in the ways in which HSE exams are administered within correctional settings. States also vary in the way they are served through the Adult Education and Family Literacy Act.

✓ ***How are these tests delivered in these settings?***

Rationale: Understanding how your state's prison system or local county/city jails administer HSE exams and which HSE options they offer is helpful for workforce system staff that collaborate or partner with correctional systems.

✓ ***Are there opportunities to partner with local correctional institutions on HSE programming?***

Rationale: Most state correctional institutions operate HSE programs and would benefit from collaborations and discussions with workforce system staff regarding reentry issues and opportunities for inmates.

✓ ***What are the benefits of obtaining HSE while incarcerated?***

Rationale: Knowing the benefits of obtaining HSE while incarcerated is important when determining the scope of collaborative services with correctional partners.

H. ADULT LEARNING

As explained in *Adult Learning Theory and Principles*, andragogy (adult learning) is a theory that holds a set of assumptions about **how adults learn**. Andragogy emphasizes the value of the process of learning. It uses approaches to learning that are problem-based and collaborative rather than didactic. It also emphasizes more equality between the teacher and learner. The following resources are links to academic materials that explain theories of adult learning and practical applications of these theories in educational and workplace settings.

Understanding the concepts of andragogy would be valuable for individuals within the workforce system and other stakeholders who direct or deliver educational experiences, including GED® and high school equivalency instruction.

H1. Andragogy Theory and Principles

Main web link: <https://sites.google.com/a/nau.edu/educationlearningtheories/adult-learning-theory-andragogy-by-barbara-miroballi>

This resource highlights the work of [Malcom Knowles](#), considered the father of andragogy. It identifies five characteristics of adult learners: self-concept, experience, readiness to learn, orientation to learning, and motivation to learn. Four principles of adult learning instruction are also discussed:

1. Adults need to be involved in the planning and evaluation of their instruction.
2. Experience (including mistakes) provides the basis for learning activities.
3. Adults are most interested in learning subjects that have immediate relevance to their job or personal life.
4. Adult learning is problem-centered rather than content-oriented.

The resource features a short video that discusses the concepts above and a graphic depiction of the characteristics of adult learners is provided.

H2. Toolkit for Adult Learning Theory and Principles

Main web link: <http://www.qotfc.edu.au/resource/?page=65375>

This resource was designed as a toolkit for occupational therapists who are responsible for directing the education of adults of all ages. It draws upon the work of Malcolm Knowles and utilizes six principles of adult learning:

1. Adults are internally motivated and self-directed
2. Adults bring life experiences and knowledge to learning experiences
3. Adults are goal oriented
4. Adults are relevancy oriented
5. Adults are practical
6. Adult learners like to be respected

For each principle, suggestions are provided as to how the educator or instructor may use the principle to develop a more effective learning environment and outcome.

H3. Adult Learning Styles

Main web link: <http://adulthood.about.com/od/applyingwhatyoulearn/tp/Learning-Styles.htm>

This resource provides information and inventories about several different concepts and theories regarding the learning styles of adults. It includes learning style theories such as multiple intelligences, peak learning times, learning modes (visual, auditory, kinesthetic), and workplace learning styles. The website includes multiple resource links to learning style inventories as well as resources for adult students returning to school.

H4. Workplace Training and Education

Main web link: <http://tribehr.com/blog/workplace-training-and-education-how-adults-learn>

This resource is a 2014 blog post prepared by [Workplace Tribes HR](#). The article describes key understandings that workforce system personnel or business trainers should know in order to more effectively provide education and training to incumbent workers. The four-part [Kolb learning cycle](#) for adult learners is featured – concrete experience, reflective observation, abstract conceptualism, and active experimentation. Also, adult learning styles are discussed and recommendations for business or employer training and education actions are provided.

H5. Adult Learner Motivation

Main web link: <http://elearningindustry.com/17-tips-to-motivate-adult-learners>

This resource describes 17 tips for motivating adult learners. Each tip or suggestion is discussed and a short video on adult motivation is included. Also, other adult learning resources are linked within this resource.

H6. Adult Learning Slide Presentations

Main web link: <http://www.slideshare.net/carterfsmith/how-do-adults-learn>

The [SlideShare](#) website includes over 25 PowerPoint presentations on the topic of how adults learn. These slide presentations may be downloaded and shared.

Workforce System Implications for Adult Learning Theory

Understanding basic concepts of how adults learn is important for workforce system personnel who provide services to adult clients, especially those who may not have a high school diploma and are in need of secondary education basic skills. For example, if clients are being referred to HSE preparation providers, knowing which providers embrace and model best practices with regard to adult learning theory is important for client success. Concepts and skills related to adult learning theory could be an important professional development component for workforce system personnel and stakeholders.

Need-To-Know Checklist for Adult Learning Theory

For **State Level** Workforce System Staff and Stakeholders

- ✓ ***What is “andragogy” and how does adult learning differ from the learning styles and patterns of children?***

Rationale: Understanding that adults learn differently from children is helpful for referring clients to adult-appropriate learning resources including HSE preparation.

- ✓ ***How does or should an understanding of adult learning theory impact workforce system client services in this state?***

Rationale: Workforce system services should provide or refer clients to educational programming that is adult-appropriate.

For **Local Level** Workforce System Staff and Stakeholders

- ✓ ***What is “andragogy” and how does adult learning differ from the learning styles and patterns of children?***

Rationale: Understanding that adults learn differently from children is helpful for referring clients to adult-appropriate learning resources including HSE preparation.

- ✓ ***How does or should an understanding of adult learning theory impact workforce system client services in my program or local area?***

Rationale: Workforce system services should provide or refer clients to educational programming that is adult-appropriate.

- ✓ ***How can I integrate adult learning theory into my programming?***

Rationale: For workforce system personnel that deliver HSE programming, professional development on the topic of adult learning theory could strengthen the instructional delivery content and process.

I. HSE AND FEDERAL STUDENT AID ELIGIBILITY

In order to receive [federal student aid](#) to attend qualifying postsecondary education or training institutions, an applicant must document that they have attained a high school diploma or its recognized equivalent. In April 2014, the USED Office of Career, Technical, and Adult Education developed a guidance letter (DCL ID: GEN-14-06) to clarify which high school equivalency tests would qualify as a recognized HSE exam for purposes of federal student aid eligibility. This letter may be viewed on the Internet at: <http://www.ifap.ed.gov/dpcletters/GEN1406.html>

In summary, the letter validates the eligibility of individuals who have earned a GED® diploma or any HSE exam that the issuing state has "officially recognized." In addition to the GED® test, the HiSET and TASC are cited as examples of HSE exams that have recently received official state endorsements. Further, the letter provides updated guidance on how applicants for federal student aid should answer the high school completion status question on the federal student aid [application form](#) (Question 26). The letter also provides a link to a [directory of state directors](#) of adult education and suggests that if a person is not sure if a particular HSE exam is officially approved by a state, they should contact the adult education agency located in that state.

Workforce System Implications for HSE and Student Aid

Workforce system personnel often serve clients that are seeking or being referred to postsecondary education or training. Most prospective students need financial assistance to enter and to persist in postsecondary programs and most seek federal student aid as one source. Providing clients with information about how to access student aid and the criteria for eligibility is an important client service. Understanding how HSE is viewed under federal student aid guidelines is one piece of this important information.

Need-To-Know Checklist for HSE and Student Aid

For **State Level** Workforce System Staff and Stakeholders

- ✓ ***How are the HSE tests used in your state viewed under federal student aid eligibility guidelines?***

Rationale: Understanding that state level endorsement of a particular HSE exam is the necessary criteria for meeting federal student aid eligibility.

- ✓ ***What documentation is needed to prove a client's HSE attainment?***

Rationale: Knowing the state-endorsed HSE credential format is necessary to determine credential legitimacy.

- ✓ ***What guidance is available at the national level to verify that the HSE credentials in your state are acceptable for federal student aid?***

Rationale: Being cognizant of the federal [guidance letter](#) regarding student aid HSE is important to verify federal student aid eligibility.

For **Local Level** Workforce System Staff and Stakeholders

- ✓ ***How are the HSE tests used in this state viewed under federal student aid eligibility guidelines?***

Rationale: Understanding that state level endorsement of a particular HSE exam is the necessary criteria for meeting federal student aid eligibility.

- ✓ ***What documentation is needed to prove a client's HSE attainment?***

Rationale: Knowing the state-endorsed HSE credential format is necessary to determine credential legitimacy.

- ✓ ***What guidance is available at the national level to verify that the HSE credentials in your state are acceptable for federal student aid?***

Rationale: Being cognizant of the federal [guidance letter](#) regarding student aid HSE is important to verify federal student aid eligibility.

J. WIOA REFERENCES TO HSE

In July 2014, Congress reauthorized the 1998 Workforce Investment Act (WIA) by replacing it with a new act, the Workforce Innovation and Opportunity Act (WIOA). The new act consolidates job training programs that existed under WIA into a single funding stream. It also amends the Wagner-Peyser Act, reauthorizes adult education and literacy programs, and reauthorizes programs under the Rehabilitation Act of 1973. The various job programs under WIOA are authorized for six years. WIOA includes two references to college and career readiness standards and several references to high school equivalency. The information below summarizes the content of the HSE references.

Main WIOA Law web link

Summary: <http://thomas.loc.gov/cgi-bin/bdquery/z?d113:HR00803:@@@D&summ2=m&>

Full Text: <http://thomas.loc.gov/cgi-bin/query/D?c113:6:./temp/~c113l2UFlk>

1. Performance Measures

Under Title I, Sec. 116 – Performance Accountability System, participants obtaining a high school diploma or HSE may be counted as meeting the performance criterion if they have either retained their employment or are enrolled in a postsecondary credential program within one year of exiting the program.

Specifically, Sec. 116 (b)(2)(A)(iii) states: *“For purposes of clause (i)(IV), clause 14, or clause (ii)(III) with respect to clause 15 (i)(IV), program participants who obtain a secondary school diploma or its recognized equivalent shall be included in the percentage counted as meeting the criterion under such clause only if such participants, in addition to obtaining such diploma or its recognized equivalent, have obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.”*

2. Use of Funds for Youth Investment Activities

Under Title I, Sec. 129 – Use of Funds for Youth Workforce Investment Activities, funds may be used for eligible youth participants in programs that lead to a high school diploma or HSE.

Specifically, Sec. 129 (c)(1)(C)(i) states: *“Funds allocated to a local area for eligible youth under section 128(b) shall be used to carry out, for eligible youth, programs that provide activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential.”*

Also under Title I, Sec. 129 – Use of Funds for Youth Workforce Investment Activities, funds may be used for eligible youth participants in program components leading to a high school diploma or HSE that feature activities including tutoring, study skills training, academic instruction, and dropout prevention or recovery.

Specifically, Sec. 129 (c)(2)(A) states: *“Funds allocated to a local area for eligible youth under section 128(b) shall be used to carry out, for eligible youth, programs that support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants. The programs described in paragraph (1) shall provide elements consisting of tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.”*

3. Job Corps Definitions

Under Title I, Sub. C – Job Corps, Sec. 142 – Definitions, the definition of the term "graduate" includes a participant who has received a high school diploma or HSE or has completed the requirements of a career and technical education and training program as a result of Job Corps participation.

Specifically, Sec. 142 (5) states: *“The term ‘graduate’ means an individual who has voluntarily applied for, been selected for, and enrolled in the Job Corps program and who, as a result of participation in the Job Corps program, has received a secondary school diploma or recognized equivalent, or completed the requirements of a career and technical education and training program that prepares individuals for employment leading to economic self-sufficiency or entrance into postsecondary education or training.”*

4. High-Performing Job Corps Centers

Under Title I, Sec. 147 (b) – High-Performing Job Corps Centers, programs may be considered high-performing if they have met the national goals or targets for the rate of high school diploma or HSE attainment. This criteria, among others established under previous law, is applicable until such time when new WIOA performance measures are in place and outcomes are being reported. The new WIOA outcomes, which include HSE attainment, will be used at that time for determining high-performing Job Corps centers.

Specifically, Sec. 147 (b)(3) TRANSITION states: *If any of the program years described in paragraph (2)(B) precedes the implementation of the establishment of expected levels of performance under section 159(c) and the application of the primary indicators of performance for eligible youth described in section 116(b)(2)(A)(ii), an entity shall be considered an operator of a high-performing center during that period if the Job Corps center operated by the entity – (A) meets the requirements of paragraph (2)(B) with respect to such preceding program years using the performance of the Job Corps center regarding the national goals or targets established by the Office of the Job Corps under the previous performance accountability system for— (iv) the rate of attainment of secondary school diplomas or their recognized equivalent.”*

5. Job Corps Management Information

Under Title I, Sec. 159 – Management Information, the Secretary of the Department of Labor must collect and report to Congress certain information from Job Corps centers including the number of graduates who received a State recognized equivalent of a secondary school diploma.

Specifically, Sec. 159 (d)(1) states: *“The Secretary shall also collect, and submit in the report described in sub17 section (c)(4), information on the performance of each Job Corps center, and the Job Corps program, regarding—(G) the number of graduates who received a State recognized equivalent of a secondary school diploma.”*

6. YouthBuild Grants

Under Title I, Sec. 171 (c) – YouthBuild Grants, eligible education activities include tutoring, study skills training, and school dropout prevention and recovery activities that are designed to lead to the attainment of a high school diploma or HSE.

Specifically, Sec. 171 (c)(1) ELIGIBLE ACTIVITIES – *An entity that receives a grant under this subsection shall use the funds made available through the grant to carry out a YouthBuild program, which may include the following activities: (A) Education and workforce investment activities including—(III) secondary education services and activities, including tutoring,*

study skills training, and school dropout prevention and recovery activities, designed to lead to the attainment of a secondary school diploma or its recognized equivalent (including recognized certificates of attendance or similar documents for individuals with disabilities).”

7. YouthBuild Participant Eligibility

Under Title I, Sec. 171 (e)(1) – YouthBuild Eligible Participants, an eligibility exemption exists for individuals who do not meet the income or educational need requirements. That exemption includes individuals who may have attained a high school diploma or HSE but are assessed to be deficient in high school level basic skills. Additionally, the number of exempted individuals must not comprise more than one-quarter of the program participant total.

Specifically, Sec. 171 (e)(1)(B) states: *“EXCEPTION FOR INDIVIDUALS NOT MEETING INCOME OR EDUCATIONAL NEED REQUIREMENTS.—Not more than 25 percent of the participants in such program may be individuals who do not meet the requirements of clause (ii) or (iii) of subparagraph (A), but who—(i) are basic skills deficient, despite attainment of a secondary school diploma or its recognized equivalent (including recognized certificates of attendance or similar documents for individuals with disabilities).”*

8. Adult Education and Literacy Definitions

Under Title II, Sec. 203 (1) – Adult Education Definitions, the definition of “Adult Education” includes, among other criteria, instruction and services leading to the attainment of a high school diploma or HSE.

Specifically, Sec. 203 (1) states: *“The term ‘adult education’ means academic instruction and education services below the postsecondary level that increase an individual’s ability to—(A) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; (B) transition to postsecondary education and training; and (C) obtain employment.”*

Under Title II, Sec. 203 (4) – Definition of Eligible Individuals in Adult Education, the term "eligible individual" includes, among other criteria, an individual who does not have a high school diploma or HSE.

Specifically, Sec. 203 (4)(C) states, *“The term ‘eligible individual’ means an individual—who (i) is basic skills deficient; (ii) does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education.”*

Under Title II, Sec. 203 (6)(B)(i)(I) – Definition of an Adult Education English Language Acquisition Program, the term term ‘English language acquisition program’ means, among other criteria, a program of instruction that leads to attainment of a secondary school diploma or its recognized equivalent. This provision allows for English as a Second Language programming to be delivered contextually using high school diploma or HSE content.

Specifically, Sec. 203 (6)(B)(i)(I) states: *The term ‘English language acquisition program’ means a program of instruction—(B) that leads to—(i)(I) attainment of a secondary school diploma or its recognized equivalent.”*

Under Title II, Sec. 211 (d)(1) – Adult Education Qualifying Adult, the term "qualifying adult" means, among other criteria, an individual who does not have a high school diploma or HSE.

Specifically, Sec. 211 (d)(1) states: *“QUALIFYING ADULT—For the purpose of sub-section (c)(2), the term ‘qualifying adult’ means an adult who—(1) does not have a secondary school diploma or its recognized equivalent.”*

Under Title II, Sec. 225 (e)(1) – Definition of a “Correctional Institution”. Although the following definition does not include a reference to HSE, correctional institutions typically provide HSE instruction through AEFLA and are defined as stated below.

Specifically, Sec. 225 (e)(1) states: *Correctional institution.--The term “correctional institution” means any (A) prison; (B) jail; (C) reformatory; (D) work farm; (E) detention center; or (F) halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders.*

Workforce System Implications for HSE References in WIOA

Many workforce system services are authorized and funded annually through the 2014 Workforce Innovation and Opportunity Act (WIOA). The act includes multiple references to HSE and consistently links a regular high school diploma with “a recognized equivalency.” It is important for workforce system personnel and stakeholders to know how equivalency is used in WIOA and specifically under which section mandates.

Need-To-Know Checklist for HSE References in WIOA

For **State Level** Workforce System Staff and Stakeholders

- ✓ **What mandates/references exist under WIOA for HSE with regard to:**
 - **Common performance measures**
 - **Use of funds for Youth Investment activities**
 - **Job Corps programs**
 - **YouthBuild programs**
 - **Adult education definitions**

Rationale: Knowing how HSE is referenced under the five topic areas (noted above) in WIOA provides an understanding of the context and importance of HSE within those topic areas. In all references, HSE is cited as an acceptable alternative to a regular high school diploma.

- ✓ **Have there been significant changes under WIOA with regard to the mandates referencing HSE?**

Rationale: In previous workforce law, the Workforce Investment Act, HSE was also linked directly with every reference to a regular high school diploma. No new concepts regarding HSE were introduced in WIOA. However, since the updating of the GED® test in 2014, many states have changed or added new HSE options to their state-endorsed HSE credential.

For **Local Level** Workforce System Staff and Stakeholders

- ✓ ***What mandates exist under the new WIOA for HSE with regard to:***
 - ***Common performance measures***
 - ***Use of funds for Youth Investment activities***
 - ***Job Corps programs***
 - ***YouthBuild programs***
 - ***Adult education definitions***

Rationale: Knowing how HSE is referenced under the five topic areas (noted above) in WIOA provides an understanding of the context and importance of HSE within those topic areas. This is especially true for local workforce system personnel that regularly conduct activities within the program areas noted above. In all references, HSE is cited as an acceptable alternative to a regular high school diploma.

- ✓ ***Have there been significant changes under WIOA with regard to the mandates referencing HSE?***

Rationale: In previous workforce law, the Workforce Investment Act, HSE was also linked directly with every reference to a regular high school diploma. No new concepts regarding HSE were introduced in WIOA. However, since the updating of the GED® test in 2014, many states have changed or added new HSE options to their state-endorsed HSE credential.