Learning Disabilities Eligibility And Services Model

Introduction and Overview
2016 Revision

CALIFORNIA ASSESSMENT SYSTEM FOR ADULTS WITH LEARNING DISABILITIES
To all of the Learning Disabilities Specialists and Students in the California Community Colleges

2015 REVISION EDITED BY:
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The original project was funded in part through a grant provided by the United States Department of Education.

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Printed in the United States of America

Original Production Coordination and Design:
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Acknowledgments

The Learning Disabilities Eligibility and Services Model provides for comprehensive assessments for learning disabilities and critical support services. It is a dynamic statewide model for our DSPS programs developed and updated by our Learning Disability (LD) Specialists through representatives by region on our LD Field Advisory Group. The model is designed to adapt quickly to changes in our field in assessment and services. Our LD Field Advisory Group utilizes the resources of numerous experts throughout the state and across the country for updates.

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Special recognition is given to the Executive Board and members of the LD Interest Group of the California Association on Postsecondary Education and Disability (CAPED), for their continued interest and support. In addition to the individuals whose names appear on the previous pages, there are many other people whose efforts have made this project possible, and we gratefully acknowledge their contributions.

Finally, we are indebted to Mr. Joseph Rosenstein of the National Institute on Disabilities Research of the United States Department of Education, Post-Secondary Education Division, for funding the original grant in 1981 through which much of the initial research was conducted. Mr. Rosenstein's belief and support in the processes which have culminated in the California Community College LD Eligibility Model deserve more recognition than we can possibly render.
Executive Summary

The current California Community Colleges Learning Disabilities Eligibility and Services Model is the result of a two-phase development and validation process followed by cyclical updates to keep the model current. In 1981, the California Community Colleges Chancellor's Office formed a consortium with the LD Interest Group of the California Association on Postsecondary Education and Disability (CAPED) and the Institute for Research on Learning Disabilities at the University of Kansas (KU-IRLD) to develop a uniform system to identify adults who are eligible for learning disabilities services within the California Community Colleges. The model was developed to (a) provide an operational definition of the learning disability construct for the college system and (b) reduce or eliminate the inequities, inconsistencies and biases that characterized previous eligibility assessment models. This system, which was implemented in 1987, includes a databased eligibility model for use in the state's community college learning disability programs. Phase two, which was initiated in 1991 and implemented in July 1994, responded to field concerns regarding the original model. The issues addressed were (a) the need to evaluate the merits of using norms based on the community colleges' population; (b) the addition of newly published versions of tests used in the model; (c) the need to incorporate new tests into the model which would have less of an emphasis on verbal ability; (d) the need to incorporate assessment measures which could be used for instructional programming; (e) the lack of representation from noncredit and adult education students in the model's technical characteristics; (f) the demand for more reliable and content appropriate measures of adaptive behavior; and (g) the need to include tests that have test protocols available.

By 1998, it became clear that additional revisions would need to be made to the model to allow for the incorporation of new and revised assessment instruments and to adopt procedures for determining processing deficits which were consistent with those recommended by the test publishers. The issues and recommendations were defined, analyzed, and studied by the Chancellor’s Office DSP&S staff and the Learning Disabilities Field Advisory (LDFA) Group with research consultation and simulations provided by professionals affiliated with the Center for Educational Testing and Evaluation at the University of Kansas. The recommendations were approved by the Chancellor’s Office in December 1998, and the date for implementation of the revised model was established as January 1, 2000. Required trainings in the revisions to the model were offered in four areas of the state in 2000. This ensured consistency in quality of our assessments and decision making.

Throughout its evolution, the model has combined the efforts of experts in a broad range of disciplines: special education, educational measurement, psychology, policy analysis, decision theory, and speech and language. At each significant juncture in the development process, major stakeholder groups (including practitioners and state agencies) participated in the deliberations on issues of planning, implementation, data analysis, presentations, and reporting. This development process provided a valued secondary product in addition to the eligibility model: the integration of specific research interests with the policy-related realities of the nation's largest community college
system. In addition, it is important to understand that assessment for the purpose of determining eligibility is only one of the services available in the LD programs. Intervention is the primary service provided for those students included in these programs.

This model, as it was originally conceived and in its current edition, blends two critical attributes of any accurate and equitable diagnostic process: (a) the professional's clinical skills and (b) standardized procedures and criteria. These attributes are reflected in the six components of the current eligibility model, which is the result of eight years of formal research in the colleges and ongoing discussion and cyclical formal statistical evaluation. Major phases of the research process and its results are highlighted below:

- Clinical characteristics of the adult student with learning disabilities were identified through a literature review, a survey of learning disabilities specialists in the community college system, and a national survey of educators, counselors, advocacy groups, and other service providers.

- The clinical characteristics were operationalized in specific test instruments to assist college personnel in the eligibility determination.

- Multiple assessment instruments of ability and achievement have been identified according to established psychometric standards to ensure greater equity across the colleges.

- In the first study, a normative database including 1800 subjects - 900 randomly selected community college students and 900 students who had been identified on their campuses as learning disabled - were assessed on a variety of self-reporting, achievement, ability, and diagnostic instruments. A database on each group was established to provide baseline data on which students with learning disabilities and their community college peers could be compared and alternative LD eligibility models could be simulated. Students from over 60 college campuses participated. From this data statewide norms were obtained to provide a measurement of community college students' performance on commonly used assessment instruments.

- In 1991-1992 a study of 617 additional students was completed. The subjects in this group included 453 randomly selected community college students and 164 students who had previously been identified as having a learning disability. Based on the results, several changes were made to the original model. The definition was revised eliminating the adaptive behavior construct, thereby reducing the components in the model from the original seven to six; national norms were adopted for evaluating students' status on most measures of ability and achievement; and new tests as well as the latest revisions of several of the tests used in the original model were incorporated.

- Groups concerned with the eligibility criteria were included as stakeholders in determining specific cut-off scores for the eligibility model. These groups
represented college administration, state control agencies, the Board of Governors of the California Community Colleges, the legislature, college instructors, LD specialists, ancillary service providers, advocacy and student groups, and vocational rehabilitation services.

- Eleven standards were specified as "yardsticks" for the development of the eligibility model. These standards provided a guideline for developing and evaluating each component, procedure, and criterion of the model.

- An eligibility model was developed that incorporated clinicians’ skills and standardized the components, procedures, and criteria for identifying students with learning disabilities. The resulting model includes multiple components that evaluate the student using normative and informal procedures. These procedures yield information in the areas of presenting problems, educational, family, medical and vocational histories, language proficiencies, academic and vocational achievement, expected achievement levels, and information processing skills.

- It was always understood that the model was dynamic and would require periodic re-evaluation and revision. The 1999 revisions to the eligibility model retained the six components from the previous version although the procedures for determining processing deficit and aptitude-achievement discrepancy were significantly altered. In addition, new tests were added and the latest revisions of several tests were incorporated. New information was included to assist in identifying learning disabilities in culturally and linguistically diverse students.

- Training and evaluation processes were adopted to ensure that (a) examiners adhere to correct implementation procedures, (b) implementation issues and questions could be addressed, and (c) continued research could be effectively carried out.

- The Computer Assisted Record-keeping and Scoring on the Web (CARS-W) program was developed in the initial phase of the model to streamline the required scoring and record-keeping functions. This program allows LD specialists to enter the raw scores from the various assessment instruments and use the resulting standard scores to evaluate whether or not a student meets each of the eligibility criteria. The program also maintains a database with the eligibility records for each student and is designed to facilitate data analysis. In 1999, CARS was reformatted as CARS-W, making the program available as a web-based application. This technological advance enhances the Chancellor's Office efforts to monitor and evaluate the outcomes of the LD model.

- In 2015 major changes were made by the field in collaboration with the Chancellor’s Office DSPS Unit. All DSPS positions were added to the statewide Discipline’s List. This process requires writing criteria for minimum qualifications (MQs) for faculty disciplines (i.e. DSPS Counselor, DSPS LD Specialist). In a two-year process the California Association on Postsecondary
Education and Disability (CAPED) worked with the DSPS Unit and our field to
write the MQs and submit them to the Academic Senate for the California
Community Colleges (ASCCC) Discipline’s List Committee to be vetted and
approved by the state Senate Delegates at Senate Plenary. The Discipline Lists
were approved and implemented in our system in 2015/2016 academic year.

The next major changes occurred in the revision of the DSPS Title 5 regulations.
The definition for LD removed average “measured achievement” as a criteria and
component of our Learning Disability Eligibility and Services Model (LDESM)
because it is not a part of any national definition and unproven as an indicator of
LD.

In addition, the LD field determined that it would follow the California State
University LD criteria and professionally consider students for LD who meet
either a processing deficit and/or an aptitude-achievement discrepancy. Because
our model is not based on test scores only, the professional will gather sufficient
supporting information and documentation to rule out alternative explanations for
learning problems and build a valid/reliable case for the identification of LD using
our new criteria.

The major focus of the initial efforts and all major revisions to our model are
based in the periodic review and updates that identify an operational definition of
learning disabilities that is used in the California community colleges. For the current
model, the LD definition was operationalized in five eligibility components, including an
Intake Screening component, three assessment-based components, and an eligibility
component. These five components are briefly described below.

- Component 1: Intake Screening. Interview and optional self-report procedures
  are completed with the student to elicit information regarding his or her current
  academic difficulties, educational history, health history, career goals, family
  history, language proficiencies, and employment experiences. This information
  provides a basis for understanding the student's perspective, choosing appropriate
  assessment instruments, and interpreting the student's performance within his or
  her familial, educational and cultural experience.

- Component 2: Ability Level. Procedures in this component indicate the student's
  potential for success in the general community college curriculum.

- Component 3: Processing Deficit. This component's procedures evaluate the
  student's weaknesses in acquiring, integrating, storing, retrieving, and expressing
  information. The processing deficit is the disability. It identifies the functional
  limitations that have an impact on the daily living skill of learning.

- Component 4: Aptitude-Achievement Discrepancy. This component's
  procedures identify those academic areas in which the student's achievement is
significantly less than that of peers with the same ability level. This component identifies the impact of the processing deficit.

- Component 5: Eligibility Recommendation. The LD specialist analyzes and synthesizes all of the assessment information to determine the best explanation for the student's performance. The specialist also determines whether the student is eligible for services as a student with learning disabilities within the community college system, and therefore for funding through the California Community Colleges Disabled Student Programs and Services (DSPS) allocation model. For students who are determined to be eligible for services, the specialist identifies the student's educational limitations and documents the recommended accommodations and compensatory strategies.

Although great effort was directed to ensure the eligibility model's reliability and validity, all students meeting the first four components' criteria are not necessarily a person with a learning disability. Other explanations could account for the student meeting the components' criteria, such as inconsistent educational experience, psychological issues, acquired brain impairment, second language learning experiences, a poor match between previous instructional emphasis and the assessment instrument, the effects of medication, and errors in the instruments. Thus, the LD specialist is confronted with two questions in the Eligibility Recommendation component: Is this student's performance best explained by learning disabilities? If not, do I want to serve this student in the LD program anyway?

Using this model, students judged eligible for the LD programs have met the specified criteria for each of the components, and accordingly, the college is entitled to state reimbursement for providing services. Alternatively, if the student does not meet one or more component's criteria, he or she may still receive services in the local college's LD program. However, if this option is selected, associated costs are borne by the local college. Most students judged ineligible are provided support with strategies aligned with the test results, referred to other appropriate services available on the campus, such as counseling, tutorial services, learning resource center, etc. It is the responsibility of the LD Specialist to use the wealth of information gathered during testing to help the student improve their learning whether they qualify for services or not.

The determination of whether a student meets a component's criterion is always made by the LD specialist. The eligibility model specifies a set of standardized normative and informal assessment instruments that are available. The choice as to which instruments will be used is made on the basis of the examiner's skills, the student characteristics, and the presenting problem(s).

The original eligibility model was implemented statewide in October 1987 with the first revision in full use by July 1994, the second was implemented in January 1, 2000 and the latest comprehensive evaluation and revision of the model occurred in 2008-2009. Implementation has incorporated (a) training programs for all certificated LD specialists; (b) review and in-service training; (c) organization of a LD Field Advisory Group composed of LD specialists to establish a regional communication linkage; (d) implementation of a campus visitation project for providing requested technical assistance; (e) bulletins from the DSPS Unit of the Chancellor's Office for
communicating policy and responses to technical questions; and (f) monitoring of the model's outcomes in the age, gender, and ethnic characteristics of students participating in LD programs. Lastly, the latest editions of all standardized tests are included in the model with old editions phased out over a two year period.

This summary has briefly described a comprehensive model implemented in the California Community Colleges for assessing students and determining eligibility for LD services. In any such summary, many important details are omitted. Further description of the eligibility model is presented in this document and in the manual developed in conjunction with this document, available through the Chancellor's Office.
Introduction

This document is one of two manuals describing the California Community Colleges’ Learning Disabilities Eligibility Model. Each manual provides specific details about the LD Eligibility Model and its application within the California Community Colleges system. The manuals are intended for different audiences and uses. For example, a college specialist, program coordinator, or dean might be particularly interested in this document, as it provides an introduction and overview of the eligibility model including basic information about the model, its historical basis and development, operational procedures for implementation, and a case study applying the model.

The second manual, entitled DSP&S Learning Disabilities Eligibility Model is intended for the practitioner. Its content includes the information needed for applying the eligibility model with individual students. Therefore, the manual contains the technical information and sequential steps to be followed in utilizing the model. Also included in the manual is the Intake Screening and Eligibility Record, which is a reproducible document used with each student who provides written consent for completing the evaluation process. The document contains three separate sections: (1) the Consent form, (2) the Intake Interview form, and (3) the Eligibility Record. The Consent form describes the eligibility process for the student and requires the student's signature prior to formal testing. The Intake Interview includes questions concerning the student's presenting problems, college goals, language fluency, and educational, vocational, medical, and family histories. The Eligibility Record is completed by the LD specialist and provides a record of the procedures and criteria used and the outcome of the evaluation process. Other reproducible materials used by the LD specialist in the eligibility process include scoring keys, stimulus materials, record forms, and test protocols; these materials may also be found in this second manual.
History and Overview

Learning disabilities have been identified as a significant cause of learning problems among students in the California Community Colleges. To be successful in college, these students may need special instructional programs and services. The number of students with learning disabilities attending California Community Colleges has increased in recent years to nearly 22,000, or approximately 1.4% of the total enrollment in the 108 community colleges. In fact, students with learning disabilities represent 28% of all students with disabilities in California Community Colleges. Currently, many of these students are receiving direct support services through formal learning disabilities programs established in the California community colleges.

Many challenging questions are raised when community colleges serve students with learning disabilities. Among them are:

- What are the characteristics of adult students with learning disabilities?
- In what ways do these students learn differently from other students?
- What assessment information is needed to provide an appropriate educational program for these students?
- What is the role of the learning disabilities specialist?
- What is the relationship among learning disabilities programs, campus instruction, and other student services?

This overview provides a rationale for the development of formal California Community Colleges Learning Disabilities programs and, thus, a foundation for addressing the questions stated above.

In the spirit of the Education for All Handicapped Children Act (PL 94-142), passed in 1975, the Individuals with Disabilities Education Act (PL 101-476), passed in 1990, the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1991, major legislation was enacted in California under AB 77 (Lanterman, 1976) and its subsequent amendment act AB 2670 (1978). This legislation authorized programs and services for LD students in the California Community Colleges. In addition, ACR 201 (1976) established guidelines for California community colleges with regard to students with disabilities. As a result categorical programs were formally established at community colleges in 1976 and special funds were provided to help meet the increased costs of educating persons with disabilities among whom are those with learning disabilities.

Learning disabilities are often confused with intellectual disabilities or other disorders. However, students with learning disabilities do not lack ability. Learning disabilities have been referred to as an "invisible disability." The disabilities of many of these students become apparent only in very specific academic or work situations. For
example, one student may perceive and read words backwards or invert letters or numbers. This slows down the reading process and impacts reading comprehension. Another student's learning disability may be evidenced only a problem follow an oral a sequence of directions or keeping up with note-taking in a lecture class. For a third student difficulty with visual-spatial relationships may impair his ability to drive a car, copy material from a chalk board, or understand and interpret tables in a textbook. It is the role of all who work with community college students to differentiate students with learning disabilities from among those with other learning problems and then provide appropriate services.

At the majority of community colleges, a member of the college faculty who is a learning disabilities specialist coordinates assessments and services for students identified with learning disabilities or are referred for testing. A valid/reliable assessment takes from 6-10 hours. Once a referral is made to the college LD program, a comprehensive evaluation of the student begins with an Intake Interview to gather detailed background information related to learning disabilities or alternative explanations for learning difficulties. The LD specialist works to help the student understand what can support or interfere with good learning. The specialist intervenes immediately with strategies aligned with the presenting problems so the student can benefit immediately to improve their learning. Next a battery of standardized psycho-educational tests is administered to a) determine whether the student is eligible for program support for the learning disability and b) develop appropriate educational programming. If the student is eligible, then the program can receive funding for the student through the apportionment process. Psycho-educational assessment, however, is only one tool for identifying these students. Testing is helpful, but it cannot ensure accurate identification of every student with a learning disability. Psychometric methods must include careful professional judgments about the referred student's educational and family background, attitudes toward testing, ethnic, racial, cultural, and linguistic background, and interest and motivation during testing, as well as the examiner's interpretation of the general pattern of test results.

In the past, individual community colleges used varied procedures and criteria for identifying learning disabled students. This variability has caused some observers to question whether or not students' educational evaluations resulted in equal educational opportunity. Historically, a variety of psychometric procedures have been developed to address these questions of variability. By definition, one component of learning disabilities is a severe discrepancy between a student's assessed intellectual ability and his or her academic achievement in the absence of any other primary disabling condition, such as mental retardation, physical disabilities, emotional disturbance, or speech and language disabilities. The problem is to determine what magnitude of discrepancy constitutes a significant aptitude-achievement discrepancy. Which ability and achievement tests are valid and reliable for adult-aged populations? How is LD identified in students with other disabilities? Besides tests designed to measure the aptitude-achievement discrepancy, what other measures should be administered to assess the student's specific strengths and weaknesses in learning?

To address these and related eligibility questions, the Chancellor's Office of the California Community Colleges formed a research consortium with the California Association on Post-Secondary Education and Disability (CAPED) and the University of Kansas Institute for Research in Learning Disabilities (KU-IRLD) in 1981. The
consortium's task was to develop the eligibility components, procedures, and criteria for the community colleges' LD programs. The consortium, known as the Statewide Learning Disabilities Project of the California Community Colleges Chancellor's Office, was funded initially through a three-year $500,000 grant awarded in 1984 by the United States Department of Education, Office of Special Education and Rehabilitative Services. The result of these efforts was the development of the first standardized assessment and eligibility model used throughout the California Community College system to identify students eligible to receive learning disabilities services. This model was formally put in place as of October 1, 1987.

During the first four years of the model's implementation, a number of issues arose which necessitated an additional research study funded by the California Community Colleges Chancellor's Office. The study, completed in 1992, culminated in a revision to the model and to the definition of learning disability upon which the model was based. This revised model was fully implemented by July 1, 1994.

In 1998, the Chancellor's Office DSP&S staff and the Learning Disabilities Field Advisory Group defined, analyzed, and studied issues and questions that led to additional revisions to the model. One of the major factors in initiating these revisions was the need to incorporate new and revised assessment instruments. In addition, the revisions changed procedures for determining processing deficits so that they would be consistent with those recommended by the test publishers. Professionals affiliated with the Center for Educational Testing and Evaluation at the University of Kansas provided research consultation in these efforts. The recommendations from these groups were approved by the Chancellor’s Office in December 1998, and the date for implementation of the revised model was established as January 1, 2000. The latest evaluation and revisions for the model occurred in 2009-2010 after the evaluation completed by the University of Georgia.

The standards below were established in the original development of the model and validated subsequently in every evaluation. (See Figure 1) These are described more fully in a later section. They have served as a reference for guiding the developers through the numerous decision points in determining the eligibility process. According to these standards the Model must:

- Use objective data
- Allow professional judgment
- Be implemented statewide
- Minimize bias
- Yield reliable information
- Provide sufficient scope of assessment
- Be time-efficient
- Be cost-effective
- Be compatible with the goals of the community colleges
- Distinguish LD from Non-LD
- Provide a rational basis for LD identification

**FIGURE 1** Standards for the Learning Disabilities Eligibility Process
The California Community Colleges Learning Disabilities Eligibility Model consists of step-by-step procedures describing the assessment components, procedures, and criteria from the initial referral to the final eligibility decision. Increased consistency in eligibility procedures and a more equitable delivery of learning disabilities program services are the outcomes that result from standardizing the minimum eligibility criteria.

A comprehensive manual, *DSP&S Learning Disabilities Eligibility Model*, provides a detailed description of these program elements. Before the step-by-step identification procedures are described, however, it is important to present the definition of learning disabilities used within the California Community College system. This definition serves as the foundation for the entire identification and eligibility process.
Learning Disabilities Eligibility Process

Learning Disabilities Definition

According to the Title 5 regulations (Section 56036 of Subchapter 1 of Chapter 7 of Division 6) that govern the California Community Colleges, in accordance with the State Education Code and State and Federal legislative guidelines, the definition of a learning disability is as follows:

Learning disability is defined as a persistent condition of presumed neurological dysfunction which may exist with other disabling conditions. This dysfunction continues despite instruction in standard classroom situations. To be categorized as learning disabled a student must exhibit:

- Average to above average intellectual ability
- Severe processing deficit
- AND/OR
- Severe aptitude-achievement discrepancy(ies)

To apply this definition to a particular community college student, the Intake Screening and three assessment components (Average to above average intellectual ability, Severe processing deficit, and/or Severe aptitude-achievement discrepancy(ies), and Eligibility Record completion) must be considered. Each component relates to a facet of the learning disabilities definition. Figure 2 lists each eligibility component and illustrates the successive steps to be followed in the learning disability (LD) identification process. The process begins with the initial referral and intake screening, progresses through the three LD eligibility assessment components, and culminates with an eligibility recommendation and, for students identified with LD, development appropriate services and educational interventions based on each student's individual educational limitations the disability causes. For students who do not have LD, appropriate intervention strategies and referrals are reviewed for implementation by the student to improve learning and outcomes.

The choice of a multiple component model was made on theoretical grounds. The theoretical concept of learning disabilities is that a common core of characteristics uniquely defines the construct. An important factor in the model is that the procedures incorporated in assessing each of the components rely on both standardized, normative measures and professional judgment. The professional's judgment directs the eligibility process, based on his or her skills and the student's presenting problems. The next section further details each of the five components in the eligibility model along with their corresponding procedures and criteria.
FIGURE 2 Components of the Learning Disabilities Eligibility Process
Description of Components and Procedures

The following is an overview of each of the five components in the LD eligibility process. Primary procedures are the first choices to be considered in assessing students. These are to be used unless they are determined to be invalid. When primary procedures are considered invalid or not sensitive to the identification of processing or basic skill deficits, then secondary procedures can provide the examiner with additional alternative choices for assessing each component. Criteria and cut scores for decision making have been statistically derived to prevent over or under-identification of students with learning disabilities and to prevent discrimination by demographics of ethnicity, language, age, and gender.

1. Intake Screening Component

The Intake Screening component provides useful background information about the nature of a student's learning problems based on educational history, language proficiency, medical and family information, work history, attitudes and efforts toward learning, and specific academic skill deficits. Initially, the purpose and procedures for LD assessment are carefully explained to the student, who is then asked for his or her written consent to proceed.

The purpose of the Intake Screening component is to gather pertinent background information about the referred student in a systematic manner, using the Intake Screening and Eligibility Record materials. Based on this background information the LD specialist will identify strategies for the student to immediately implement during the testing period. The LD Specialist monitors the student’s use of the strategies, his/her adaptability, and modifies the strategies with the goal of immediate improvement in learning. If a learning disability exists, just the strategies will not ameliorate all learning problems; however, they will help the student learning to self-monitor, know when to ask for help, and develop the adaptability needed for success in learning and in life.

Results from this component are not prerequisites for assessing the student on other components. However, the results can be helpful to the LD specialist in determining whether further assessment is warranted, what tests to administer, or whether some rationale other than a specific learning disability provides a better explanation for the student's achievement problems. Therefore, this component must be completed before proceeding with the other components.

Procedures

Consent form (required)

Intake Interview (required)
2. Ability Level Component

The Ability Level component is designed to assess the student's intellectual capacity to learn in the community college setting. The tests measure processing abilities in a number of ways using the senses that align with learning in the classroom, while studying, and during test taking. Thus one’s ability to process information at an average to above average level is critical to learning. In addition, the component provides evidence for alternative explanations for a student's academic problems. Further, assessment results from this component can be used later in the eligibility process to determine an aptitude-achievement discrepancy.

The primary procedures for the Ability Level component are standardized normative measures of cognitive ability. These instruments assess the student's likelihood of successful achievement in the community college. The information has predictive utility in designing and implementing appropriate instructional goals, strategies and activities for the student. Instructional programming available to students with learning disabilities assumes that the student's ability level is at least at the sixteenth percentile (equivalent to a standard score of 85) in comparison to his or her peers. There are a variety of scores from assessment instruments that might be used to evaluate this criterion. If these instruments are judged invalid, Professional Certification may be applied.

**Procedures**

Wechsler Adult Intelligence Scale *(primary)*

Woodcock-Johnson Tests of Cognitive Ability *(primary)*

Standard Progressive Matrices *(secondary)*

Batería Woodcock-Muñoz—Pruebas de Habilidad Cognitiva
Note: May be administered to Spanish-speaking students. *(secondary)*

3. Processing Deficit Component

The student with learning disabilities lacks the ability to acquire, manipulate, integrate, store, and/or retrieve information in the manner in which most students perform these tasks. One or several of these processing areas may be significantly weak. This component shows where the information processing breaks down and causes the learning problems. Examples for processing skills measured include memory, speed, fluency, visual, auditory, language, logic, etc. The Processing Deficit component is completed to verify that the student's difficulty is due to one or more of these factors. Evidence of a processing deficit is critical to distinguishing students with learning disabilities from other underachieving students. However, the presence of this factor, just as with the other eligibility components, is not in itself sufficient to indicate a learning disability.
Procedures

Wechsler Adult Intelligence Scale (primary)

Woodcock-Johnson Tests of Cognitive Ability (primary)

Batería Woodcock-Muñoz—Pruebas de Habilidad Cognitiva
Note: May be administered to Spanish-speaking students. (secondary)

4. Aptitude-Achievement Discrepancy Component

The most commonly accepted characteristic of the student with learning disabilities is that he or she is not achieving at a level one would expect based on the student’s overall ability. This difference from expected achievement reflects the severity of the impact of the learning disability. The discrepancy between expected and actual achievement is calculated and evaluated in this component.

The Aptitude-Achievement Discrepancy Component measures the level of a student's under-achievement by comparing the results from an aptitude procedure with those from an achievement procedure. The aptitude test results are compared with the achievement test results.

As with the other eligibility components, a variety of reasons other than learning disability might account for a student meeting this component. Some of the more probable reasons are (a) that the student has not had appropriate instruction; (b) that the instruction received did not match the content of the achievement test; (c) that the student's education has been interrupted sufficiently so that there has been little consistency; (d) that the student's language differences impeded his or her performance on the achievement measure; (e) that there was an error due to the multiple comparisons made between ability and achievement; and (f) that it was due to some other disability, e.g., emotional disturbance, developmental delays, and so on. Each of these factors is likely to increase the probability of the student evidencing an aptitude-achievement discrepancy that would meet the criterion of this component. Thus, while the determination of a significant aptitude-achievement discrepancy is necessary for verifying a learning disability, its presence is an insufficient condition on which to base identification.

A variety of measures may be used in evaluating this component.

Procedures

Measures of Aptitude

Wechsler Adult Intelligence Scale (primary)

or

Woodcock-Johnson Tests of Cognitive Ability (primary)

or
Standard Progressive Matrices (secondary)

or

Batería Woodcock-Muñoz—Pruebas de Habilidad Cognitiva
Note: May be administered to Spanish-speaking students. (secondary)

and

Measures of Achievement

Woodcock-Johnson Tests of Achievement (primary)

Wechsler Individual Achievement Test (primary)

Nelson-Denny Reading Test Forms G or H (primary)

Degrees of Reading Power (primary)

Wide Range Achievement Test (primary)

Batería Woodcock-Muñoz—Pruebas de Aprovechamiento
Note: May be administered to Spanish-speaking students. (secondary)

5. Eligibility Recommendation Component

The Eligibility Recommendation Component is the last of the components in evaluating a student for learning disabilities eligibility. The procedures incorporated here all rely on the judgment of the professionals involved in the student's assessment. That is, no additional assessment instruments or cut-off scores are prescribed for making the determination. Rather, the tasks are completed by the clinician and rely solely on his or her judgment. Four tasks have been defined for the learning disabilities specialist in this component: (a) collect and summarize the results of the previous assessments; (b) evaluate the results for their sufficiency, reliability, objectivity, and validity; (c) consider alternative explanations for the student's performance in addition to learning disability; and (d) conclude which explanation is most appropriate.

The questions of the results' sufficiency, reliability, objectivity, and validity were addressed as each component was completed. They are repeated again because of their importance; in this component, the results are summarized and considered as a whole. Sufficiency refers to the comprehensiveness of the procedures and addresses the question of whether the testing was comprehensive enough to determine the depth and scope of the student's performance on the component.

The reliability issue concerns whether the results provide a consistent representation of the student's performance. If the results are not reliable, one does not have a basis for making a decision. Additional data are needed for the clinician to have a basis for knowing a student's typical response to tasks. Data can be no more valid than they are reliable.
Objectivity is closely related to reliability. The objectivity criterion is met by minimizing the judgments required by the clinician. That is, the student's own performance provides the evidence of skills and abilities, with minimal inference needed by the clinician. On this issue, the LD specialist again reviews the results to assure that they indicate an unbiased representation of the student.

The validity issue is, perhaps, the most complicated and important. If the student's performance does not reflect the construct supposedly being measured, the score is invalid. For example, if the construct assessed by the test is reading achievement, but the student has minimal English skills, one would exercise caution in interpreting the student's performance. Does the task reflect reading skills or language fluency? The resulting score may not have the same meaning as it would if a native English-speaking person were asked to complete the task. In addition, one would want to know whether students such as the one being assessed were represented in the standardization sample or if the sample was composed of only native English speakers. These four issues are all important in considering the student's performance and drawing any conclusions.

The instruments in the eligibility process are not perfect when considering the four indices just cited, just as the medical or physical sciences lack perfect tests. The fallibility of these instruments, the influence of competing values, and the multiple opportunities for the clinician's judgment in the eligibility process have possible consequences of yielding erroneous conclusions. Yet, this situation is no different than in other, comparable disciplines – the physician's medical diagnosis, the policy analyst's policy recommendation, or the business woman's marketing plan, for example. In each instance, the decisions are weighed against some standard of expected risks and benefits. The criterion or cut-off scores set for the learning disability eligibility components were chosen to provide a balance between false positive and false negative errors, i.e., the risks and benefits of incorrectly including or excluding a student on a component. Since the agencies and participants reasoned that the worst error to make was a false negative, the cut-off scores were chosen accordingly. The consequence is that the procedures yield significantly more false positives than misses. It is important to remember that a student may meet the criteria for the first five components, but for reasons other than learning disabilities. The LD specialist must therefore complete the four steps outlined above for the Eligibility Recommendation component and may decide not to recommend the student to be eligible for LD services supported through state reimbursement, even though the student may have met the criteria for the first five components.

The bottom line for this component is the LD eligibility decision. The steps in the eligibility process can be seen as a series of hurdles, with data collection occurring at each hurdle. The LD specialist makes the final determination only after considering all the data in light of the model's standards and criteria.

**EVALUATION OF PRIOR DOCUMENTATION**

When the Learning Disabilities Eligibility Model was incorporated into the Implementing Guidelines for Title 5 of the California Code of Regulations (which governs programs and services for students with disabilities in California community colleges) in 1987, LD specialists finally had a well-researched and standardized model for identifying community college students with learning disabilities, as long as the
student completed the entire community college eligibility process. However, the question still remained, "How should specialists treat documentation of learning disabilities completed outside the community college setting, especially in light of having this new standardized model?"

In July 1997 the Association on Higher Education and Disability (AHEAD), a nationally respected organization of disability specialists, published the *Guidelines for Documentation of a Learning Disability in Adolescents and Adults*, a comprehensive guide designed to be used by professionals in evaluating documentation of learning disability assessments. These Guidelines were ideally suited to the community colleges’ need to evaluate assessment information brought to the college by the student.

In Fall 1998, the Learning Disabilities Field Advisory (LDFA) Group endorsed the AHEAD Guidelines as the criteria to be used to evaluate prior documentation of learning disabilities. When used with the Title 5 definition of learning disability, the Guidelines provide a clear and comprehensive model for determining if a student’s prior disability documentation is sufficient for DSP&S to be able to "qualify" the student as having a learning disability and, subsequently, request reimbursement for any services rendered to the student. As new guidelines have developed nationally and been implemented our system has analyzed, revised, and updated our guidelines for evaluating outside documentation.

As a result of the reauthorization of the Americans with Disability Act Amended (ADAA) in 2012, in Fall 2015 and Spring 2016 the LDFA working in collaboration with the LD field and Chancellor’s Office revised guidelines for the review and decision making for consideration of documentation or the self-report of a student with a history of service for LD. These guidelines provide structure for consistency in the authorization of services based on the existence of functional limitations that impact learning. These guidelines will provide consistency needed for opportunity and access to learning by students who have previously been served as a student with a disability.

**Professional Certification Procedures**

Each student evaluated with the LD Eligibility Model presents unique characteristics. The eligibility model was designed to accommodate most students, but for a small group of students some assessment modifications may be needed. The Professional Certification procedure was designed to accommodate those students for whom the primary and secondary assessment procedures have been judged to be invalid or insufficient to demonstrate ability, processing deficit, and/or aptitude achievement discrepancy. The Professional Certification procedure refers to the use of an assessment procedure to evaluate a particular student's performance on one or more of the four eligibility components to which it applies.

The Professional Certification procedure is for assessment purposes; therefore, when a Professional Certification procedure is used, the student must still meet a criterion for the component. For example, an examiner may judge that a student cannot be assessed with the primary and secondary procedures for the Ability Level component and, thus, decide to use a Professional Certification procedure. The specific Professional Certification procedure the examiner chooses must still provide information that is
appropriate to the component and that can be evaluated against the component's criterion. Just because a Professional Certification procedure is used does not mean that the student automatically meets the criterion for the component.

The primary and secondary procedures to be used have been specified for each of the applicable components. These primary and secondary procedures must be used if the information they provide is considered valid. If neither a primary nor a secondary procedure is valid for one or more of the eligibility components, then a Professional Certification procedure should be used. The Professional Certification procedure may be completed for more than one eligibility component for a student; however, each application of the procedure must have its own documentation following guidelines presented in the *DSP&S Learning Disabilities Eligibility Model* manual. The main point underlying these guidelines is to provide sufficient written information so that others will clearly understand how this component was assessed and how the information was applied in determining whether or not the student met the criterion for the component.
Statewide Policy Issues

The California Community Colleges Learning Disabilities Eligibility Model addresses important statewide policy issues that must be considered when using these procedures. Among those discussed in this section are:

- Standards for development and implementation
- Ethical standards
- Professional judgment

These policy issues represent procedures that shaped the development of the California LD Eligibility Model. The section on Standards for Development and Implementation explains the values that govern the implementation of the LD eligibility process and that guided the development of this LD identification model. The section entitled Ethical Standards is not only a series of policy statements, but also represents the principles of professional practice required when assessing a student for LD services. The section on Professional Judgment describes the procedures that will ensure the efforts of the LD specialist to determine appropriately a student's eligibility for LD services.

STANDARDS FOR DEVELOPMENT AND IMPLEMENTATION

As the California Community College LD Eligibility Model was being developed initially and field-tested over a four-year period and subsequently revalidated over time, a number of questions surfaced. Some of the most frequently asked questions are presented below.

- What standards govern the implementation of the California Community College LD Eligibility Model?

There is no one theoretical model for the identification of learning disabilities. Instead, procedures for the identification of LD students are based on a number of models. The development of any LD assessment model must be based on decisions stemming from the values of those who have a stake in providing or using services and funding. The values of the various stakeholders determined the set of standards that governed the development and implementation of these procedures. The model for identifying LD students in the California Community Colleges is based on eleven standards. Following is a description of each of those eleven standards, a rationale for their inclusion, and a statement about how this eligibility model for identifying LD students in California Community Colleges meets these standards.

1. Use Objective Data

The data used to qualify students referred for LD services must be objective. Objective procedures result in a smaller chance of errors being made in placement decisions. Objective measures of LD characteristics are the foundation of the California Community College LD Eligibility Model.
2. **Allow Professional Judgment**

Professionals use tests to evaluate a student's eligibility for services; the *professional*, not the test, is the final judge. If judgments were based upon tests alone, unfair placement decisions might result. According to the California Community College LD Eligibility Model procedures, the final decision about test use, interpretation, and placement recommendations rests with the professional.

3. **Be Implemented Statewide**

In the interest of fairness, these criteria should be uniform and should be implemented statewide. Otherwise, a referred student could be determined eligible for LD services at one community college and not at another. Hence, students who transfer from one community college to another might be in jeopardy of losing LD services because of inconsistent practices among colleges. The California Community College LD Eligibility Model procedures are being implemented statewide to prevent this problem.

4. **Minimize Bias**

When rigid and restrictive LD evaluation procedures are adopted, the danger exists of misidentification of minority group members. In a diverse state such as California, LD evaluation procedures must be sensitive to the unique needs of these groups. The California Community College LD Eligibility Model procedures require the examiner to select appropriate assessment measures that will be fair to referred students and give the professional the freedom to make interpretations about how test results should be used in the best interest of the student.

5. **Yield Reliable Information**

A true learning disability is a relatively stable characteristic. Individuals do not experience learning disabilities in every learning situation, but there is usually consistency within learning situations. Reliable evaluation procedures will uncover these learning disabilities, but erratic or unstable measures will not. The procedures used in the California Community College LD Eligibility Model were carefully selected to provide the most reliable information about learning disabilities.

6. **Provide Sufficient Scope of Assessment**

Learning disabilities is a multidimensional construct. No single assessment instrument can capture all of its facets. The best practice is to use multiple methods of assessment based on multiple sources of information. The California Community College LD Eligibility Model permits several procedural options within each evaluation component, so the examiner is not limited to a sole criterion.
7. **Be Time-Efficient**

Large amounts of time spent on LD assessment do not necessarily result in reliable and valid identification. In fact, too much assessment can also result in misidentification. The answer is to select carefully the kinds of procedures to be used, based upon the referral problem and the kinds of information being sought. With advanced planning, an experienced examiner can use the California Community College LD Eligibility Model procedures to make the kinds of assessment decisions that will result in accurate evaluation and appropriate intervention without unnecessary time expenditures.

8. **Be Cost-Effective**

One goal of effective LD assessment is to conduct an accurate evaluation in a cost-effective manner. Reliability and validity of assessment results are never sacrificed to achieve cost-effectiveness; however, there must be a balance. A number of the assessments within the California Community College LD Eligibility Model may be group-administered, which result in some cost savings. Overall, the examiner's good judgment, planning, and organization may contribute most to cost-effectiveness.

9. **Be Compatible with the Goals of Community Colleges**

The California Community Colleges are dedicated to providing appropriate educational programs so that students may realize their full potential for educational growth. The California Community College LD Eligibility Model is viewed as one means by which that goal may be reached. The procedures are intended to expand the educational, vocational and career opportunities available to students attending the California Community Colleges.

10. **Distinguish LD from Non-LD**

The field of LD assessment is still young and dynamic. There is little consensus about what is the best procedure to distinguish LD from non-LD. Instead, the procedures are based on empirical findings from scholarly research. Careful psychometric considerations went into the development of the California Community College LD Eligibility Model. Modifications have been made in both LD assessment procedures and the eligibility criteria as research and development were conducted in the 1987 study and in the 1994 update. Further modifications to these assessment procedures and eligibility criteria have been made in the 1999 and 2009 update. The California Community College LD Eligibility Model procedures best serve to distinguish LD from non-LD, given what is known about learning disabilities today.

11. **Provide a Rational Basis for LD Identification**

The most useful LD evaluation procedures provide objective information about the nature of the referred student's learning problems in order to develop educational
interventions. That is, they provide a rational basis for LD identification. The California Community College LD Eligibility Model was built on the assumption that these standards, which embody stakeholder values, should rationally guide the entire evaluation process, from referral through the six eligibility components, and should culminate in an appropriate educational program for each eligible student. This approach is rational because it goes beyond identification to help the LD specialist and the student plan educational programming.

**Ethical Standards**

- *What practices are to be followed to ensure ethical application of assessment in the Learning Disabilities Eligibility Model?*

  Among the ethical standards that apply to the practice of psycho-educational assessment are the *Ethical Principles of Psychologists and Code of Conduct* (APA, 1992), the *Standards for Educational and Psychological Tests* (APA, 1999) and the *Code of Fair Testing Practices in Education* (JCTP, 1988). Tests are useful tools only when used in an ethical manner. Consequently, the examiner has a responsibility to understand the ethical implications of assessing students who request LD services. Professionals assessing potential LD students have the responsibility to:

  1. Ensure that LD eligibility assessments are conducted to broaden, not limit, student access to the educational resources of the community college, regardless of race, sex, color, religion, disability, culture, linguistic ability, or national origin.

  2. Conduct assessments in a manner that protects the integrity and welfare of referred students as individuals who are capable of learning given the appropriate educational opportunities.

  3. Consider the profound effects their recommendations may have on the lives of referred students.

  4. Fully inform the student about the purpose for testing, the kinds of tests to be administered, and the intended use of the test results.

  5. Explain the test results, consequences, and recommendations to the student.

  6. Work toward fully including LD students in every aspect of the community college program whenever possible.

  7. Be aware of test biases against minority group members and others, which may invalidate the results of the testing.

  8. Ensure that the permission for testing is made on a fully informed and voluntary basis.

  9. Protect the confidentiality of the information obtained in the course of the assessment.
10. Carefully check the reliability and validity of test results before using those tests to make educational decisions.

11. Consider the testing conditions when judging the reliability and validity of test results.

12. Adhere to standardized test format, mode of administration, instructions, language, and content.

13. Maintain the security of test materials and ensure their appropriate use by qualified staff.

14. Make provisions for storing and disposing of records.

15. Report any reservations regarding validity or reliability of results based on testing circumstances or inappropriateness of the test norms for the person tested.

16. Ensure that the highest ethical standards are applied to research: informed consent, confidentiality of individual results, and accurate reporting of results to the research participants.

17. Consider alternate explanations for test results before accepting test scores as an accurate reflection of the student's knowledge, skills and abilities.

18. Never use test scores to justify an educational decision that has been based largely on another factor.


20. Recognize the limitations of their own competencies as examiners and administer only those tests they are qualified to administer and interpret.

21. Work cooperatively with other professionals to promote student growth and achievement.

**Professional Judgment**

- *How can professional judgment best be used?*

While the determination of some conditions can be done with relative certainty, the evaluation of LD is not as clear-cut. For this reason, a number of steps have been devised to assist the professional in making proper determination. *Professional judgment consists of the careful implementation of each of these steps so that a decision can be rendered based upon all the reliable pieces of information that are available.*
Two important features must be addressed in considering how professional judgments are best made on behalf of students referred for LD evaluation and eligibility. First, the *Learning Disabilities Eligibility Model Introduction and Overview* manual contains a series of procedures that must be followed carefully in order for the eligibility determination to be made with the greatest possible accuracy. Not to follow the established procedures may be tempting at times, but it is an invitation to failure. The LD Eligibility Model is devised to maximize accuracy in the LD evaluation process. If the procedures are not followed consistently, accuracy will unquestionably suffer.

The second important feature that must be considered is that only reliable information should be used. If the procedures are followed and the student is determined eligible or ineligible for services, the examiner's responsibility is to ensure that "hunches do not override evidence." Professionals are needed to collect and evaluate all relevant data. Professional training and experience are simply wasted if unreliable data is included.

There are a few precautions which examiners can take to minimize professional judgment errors; this will significantly improve the opportunity to reach an accurate conclusion.

1. Try not to jump to conclusions. If a hypothesis is formulated too soon, evidence may be seen later as being consistent with that premature conclusion even when the later facts are truly inconsistent. Give all the evidence a fair trial.

2. If one hypothesis becomes evident (e.g., eligible for services) as a likely conclusion, before finalizing your thinking, be sure to give alternative hypotheses some consideration. "Can the evidence be explained just as well if I attribute it to poor English skills, poor attendance, low motivation, etc.?" Almost any hypothesis seems plausible when it is considered by itself. Only the best hypothesis will continue to look good after it is compared with serious contenders.

3. Remember that repeated sampling is guaranteed to yield data of higher validity than one-shot sampling. Thus, mispronunciation of one word is not diagnostic of anything; several mispronunciations are informative. That is another good reason to hold the final conclusion in abeyance until all the data are in.

4. Some data are more valid and reliable than others. A decision should be based on the best data available. For example, if a test thought to be appropriate for a student yields one conclusion (e.g., ineligible for services), but it is noticed that the student has below-average handwriting, it would be a mistake to conclude that the handwriting quality is characteristic of LD.

5. Every scientific experiment has a control group, and LD evaluation should have one, too. If, while performing a professional certification, you note that the student has demonstrated "inconsistent test
performance," remember that non-LD students aren't perfectly consistent test-takers either. The level of a behavior in a non-LD student serves as a "control group." In order for someone to give indications of LD, that student must manifest levels *above* that of the non-LD student. Just demonstrating the behavior isn't diagnostic.

6. Suppose an eligibility determination is made, and later it is learned that the decision probably was not correct. This alone is not a sufficient reason to revamp either your procedures or the testing flowchart. The determination of LD is so difficult that even the very best effort using the very best procedures cannot achieve 100% accuracy. Misclassifications will occur because perfection is not attainable. If procedures constantly keep shifting in response to each misclassification, it is most probable that: (1) consistency and, therefore, accuracy will be lowered; and (2) evaluation of the California Community College LD Eligibility Model will be difficult. Accurate data allows for fine-tuning of the LD Eligibility Model. Until other refinements are made, the current set of procedures represents the State's and therefore each college's best process for accurate evaluation of these students.

1 This section was prepared by Dr. Hal Arkes at Ohio University. The California Community Colleges gratefully acknowledge Dr. Arkes' contribution.
Computer Assisted Record-keeping and Scoring Program  
(CARS-W)

**HISTORY**

In 1988, plans were initiated to develop a computer program that would address the record-keeping and scoring functions of the California Community Colleges Learning Disabilities Eligibility Model. A group of learning disabilities specialists from the colleges met with research staff from the University of Kansas Institute for Research in Learning Disabilities to review current computer programs and to identify features that would facilitate the recording, scoring, and reporting of different aspects of the eligibility process. Data processing staff from the Chancellor's Office were then assigned the task of creating the computer program to implement the recommendations of this group. The result was CARS 2.0, the first generation of the Computer Assisted Record-keeping and Scoring program, which greatly facilitated several tasks confronting learning disabilities specialists in determining students' eligibility for services. The program was designed to serve four purposes:

- **IMPROVE ACCURACY OF SCORING**

  Conversion of raw scores to standard scores and percentiles was difficult because of the multiple tables that accompanied the tests used in the eligibility process. CARS accurately converted raw scores to national and California normative scores for students 18 years of age or older. In addition to calculating test scores, CARS also simplified the process of performing the comparisons used in determining a student's eligibility for services, thereby eliminating the need to review numerous tables from the *DSP&S Learning Disabilities Eligibility Model* manual and increasing the accuracy of the decision-making process.

- **FACILITATE RECORD MANAGEMENT AND STORAGE**

  CARS provided a record of students assessed by each LD specialist. This record permitted easy access for reviewing and updating information.

- **PROVIDE ACCOUNTABILITY**

  CARS provided a detailed measure of accountability, and the carefully sequenced steps helped ensure that students were treated consistently and equitably.

- **PROVIDE FOR RESEARCH AND DEVELOPMENT**

  The eligibility procedures and criteria could be carefully evaluated through the database of student assessment information, and this information could easily be compiled for reporting to the California Post-Secondary Education Commission (CPEC) as required during the first four years of the model's implementation.
When the California Community Colleges Learning Disabilities Eligibility Model was updated in 1994, it became necessary to revise the CARS program to reflect changes in the model. CARS 3.0 was developed to support the revised model, including the adoption of current assessment instruments, the elimination of California norms, and the inclusion of 17 year old students. In addition to the scoring and eligibility functions, new reporting features enabled the LD specialist to generate reports summarizing students' demographic information (e.g., age, gender, ethnicity), test results, and outcomes on the eligibility model. An expanded database function allowed for the examination of student records on any of the multiple fields of data found in the Intake Interview. In response to input from the field, the updated CARS program underwent a series of refinements and was made available to the colleges in 1996.

**CARS ON THE WEB (CARS-W)**

In 1999, when the LD model was again updated, CARS was reformatted as CARS-W, making the program available as a web-based application. This technological advance enabled LD specialists to access the program from any computer with Internet capability and enhanced the Chancellor's Office efforts to monitor and evaluate the outcomes of the LD model. Password protected and campus-specific, CARS-W offers secure access to scoring, eligibility reports, and data storage for all registered users. Test scores and reports may be easily printed, and a detailed help menu is available to guide users through the program's many features. CARS-W provides a wealth of data for ease of evaluation of the assessment model to ensure validity, reliability, and to review for possible bias.

While use of the CARS-W program is not mandatory, the advantages that it offers in terms of increased accuracy, time efficiency, and storage space considerations have led to widespread adoption throughout the community college system.
Major Policy Questions & Answers

In order to implement the California Community Colleges Learning Disabilities Eligibility Model, specific programmatic questions must be addressed. In turn, such questions raise policy considerations, which then lead to formal implementation guidelines from the California Community Colleges Chancellor's Office. The policy questions and answers that follow are drawn from Chancellor's Office Disabled Students Programs and Services (DSP&S) guidelines. They are designed to assist both administrators and LD specialists in utilizing the LD Eligibility Model.

**Funding for LD Assessment**

- *Since the LD Eligibility Model is required for determining eligibility for services as a learning disabled student in the California Community Colleges, how is the assessment funded?*

Anticipating the impact of the new process on resources of the Disabled Students Programs and Services (DSP&S), the Chancellor's Office submitted a budget change proposal to the governor for 1987-90. An additional $1.1 million per year was appropriated to assist with the costs of LD referral, assessment and enrollment. These funds were in addition to AB77 funds for DSP&S, which allocate dollars through the State budget process to cover the costs of serving students with disabilities in the 108 community colleges in the California Community College System. Initially the money from this additional allocation was set aside specifically for the use of LD programs to pay for the direct costs associated with the assessment. Later the money was rolled into the general allocation. The cost of assessment is now borne by the DSP&S programs through their own allocations and individual district resources.

**Use of Previous Test Data and/or Student Self-Report of Disability Services**

- *How should previous assessment data be used within these LD eligibility procedures?*
- *Can test scores from the student's high school program be used?*
- *What about assessment completed by the Department of Rehabilitation or other outside agencies?*
- *What should be done when considered the self-report of a disability?*
Referrals for LD assessment often require that testing be completed, but this is not always the case. Instead, it may be possible to use test records that are no more than three years old to either meet eligibility or to meet specific ability and achievement components in the model. Previous test records may save time and avoid duplication of professional efforts.

To address the issue of the use prior documentation, a process has been developed and included in the most recent revision of the model. The conditions and criteria under which prior documentation and assessment may be used are outlined in the Use of Prior Documentation: Guidelines on Documentation Practices for Services for Learning Disabilities and for DSP&S Funding from the DSP&S Learning Disabilities Eligibility Model manual. The model has adopted guidelines referencing the Association on Higher Education and Disability (AHEAD) for evaluating outside documentation.

When tests that are currently in the model have already been administered, it may be possible to use assessment results directly in specific components. Before deciding to use previous test records, the LD Specialist determines that the source for the records is reliable. Second, previous test records may be used if the circumstances under which the original testing took place have not changed substantially. Recent test records may be an efficient way to avoid over testing, but caution is needed in deciding when and how to use the test results.

Note that raw scores for the tests must be provided if the Computer Assisted Record-keeping and Scoring on the Web (CARS-W) program is to be used to perform calculations for the eligibility components.

**RECORD-KEEPING**

- What principles should be followed in keeping records of assessment data?

Once the assessment process is completed and a student is determined eligible for services as a learning disabled student, he or she will never have to establish eligibility again to receive services at any community college in the state of California. Although not classified as permanent records by Title 5, the eligibility record for each student should be maintained in some form to assure access to these records at any time throughout the student's educational process. This means that many student test records and reports will start to accumulate. Ideally, hard copies of test records and reports are kept confidential and stored, but realistically that may not be possible because of space considerations.

With the revision of CARS to CARS-W many of the issues related to record-keeping have been completely resolved. CARS-W will allow all essential information regarding the assessment and eligibility process to be retained in digital format on a server maintained at the California Community Colleges Chancellor's Office. This information will not only be available to the DSP&S staff at the college where the initial eligibility was completed, but may be made accessible to other California community colleges in the event that a student transfers to another California community college. CARS-W will insure safe and accessible maintenance and storage of these records over time. If the original version of the Computer Assisted Record-keeping and Scoring (CARS 2.0 or 3.0) program was used to create and store the student assessment and
eligibility records, and back-up files were maintained of these records, then records should be able to be maintained indefinitely without tremendous demand on storage space.

In any case, since these records are not classified otherwise, Title 5 considers them disposable. This means that assessment records, including the test protocols and other data used to determine eligibility, must be maintained for at least three years after the student leaves the college before they may be destroyed. Even so, if space is available, it may be prudent to keep the records longer.

**STANDARDS FOR EDUCATIONAL AND PSYCHOLOGICAL TESTS**

- *How can an LD specialist ensure proper practice in test administration?*

  The LD specialist must adhere to the procedures described in the *Standards for Educational and Psychological Tests* developed and revised by the American Psychological Association (1999). Tests must be used only in the manner prescribed in the test administration manuals. For example, the Wechsler Adult Intelligence Scale - III is an *individually administered* instrument and should never be used as a group test. This would constitute educational malpractice for which the LD specialist, DSP&S administrator, and college could be held liable.

**DETERMINATION OF LD ELIGIBILITY**

- *Who can determine the eligibility of an LD student at a community college?*

  LD specialists who meet minimum qualifications and have completed the statewide LD training in the eligibility procedures for certification with the California Community Colleges are authorized to make the determination of LD eligibility. The LD specialist verifies in writing that each of the six eligibility components has been met by the student.

  The purpose of these qualifications is to promote good practice in administering, scoring, and interpreting psycho-educational tests and related student information in order to make sound eligibility determinations. Appropriate coursework, minimum qualifications, and training help to facilitate statewide procedural consistency and safeguard against claims of educational malpractice.

**MINIMUM QUALIFICATIONS FOR LD SPECIALISTS**

- *What are the minimum qualifications that an individual must have in order to make an eligibility determination using the model?*

  Professionals in the position of LD specialist within the California Community Colleges are required to meet the minimum qualifications found in the Discipline’s List on the CCC Website.

**TRAINING IN THE ELIGIBILITY PROCEDURES FOR LD SPECIALISTS**
How do LD specialists receive training in the California Community Colleges Learning Disabilities Eligibility Model?

Training for new LD specialists and for those needing a refresher course is offered by the California Community Colleges Chancellor's Office on a regular basis.

Training Criteria

For admission to training, each participant must meet the following criteria:

1. Provide documentation that he or she meets the minimum qualifications for instructor in learning disabilities as set forward in Title 5;
2. Provide documentation of formal training in the standardized assessment instruments including: theory, test constructs, administration, scoring, interpretation, and decision making. Evidence of administration with professional oversight is required.

The verification must include appropriate training specifically in one of the following aptitude tests and one of the following achievement tests: the Wechsler Adult Intelligence Scale, Weschler Individual Achievement Test, or the Woodcock Johnson Tests of Cognitive Ability and Achievement.

Appropriate Use of Others in the LD Assessment Process

What are appropriate ways in which paraprofessionals and other professionals (e.g., adjunct faculty, LD instructors, and assessment technicians) can be utilized in the assessment procedure?

Paraprofessionals and other professionals assigned to the LD program work under the supervision of an LD specialist and carry out the duties assigned by the LD specialist. These duties may include: (1) assistance in carrying out components of the Student Educational Contract (SEC) for each LD student, and (2) clerical responsibilities in assisting the LD specialist.

Paraprofessionals are not LD specialists. However, paraprofessionals may be encouraged to complete the necessary training required to meet the minimum qualifications so that they may apply for LD specialist positions as they become available.

Assessment of Returning Students

Can a transfer student from another California community college who has been assessed under the LD Eligibility Model receive LD services at the receiving college?
An LD student assessed at another California community college may transfer eligibility for LD services to any community college in California as long as appropriate documentation (copies of the five eligibility components and copies of test protocols or assessment results) has been forwarded to the receiving campus from the previous LD program. The LD specialist at the receiving campus may take a student through additional testing if, in his or her best judgment, assessment should be done to provide a current record of the student or it is necessary to provide information for the development of accommodations and services however, this assessment is not required for eligibility determination. The use of CARS-W with all newly referred students will facilitate this process for students and specialists and will ensure that all appropriate documentation is available to the receiving programs.

- What about students who transfer from a college or university outside of the California Community Colleges system and have been assessed elsewhere?

At this time, all students who have been assessed elsewhere (e.g., CSU, UC, private universities, out-of-state colleges, or by other agencies or individuals) will need to have adequate documentation using the model’s Outside Assessment Guidelines or be assessed as new students requesting services from the LD program. Information and test scores provided by other colleges or agencies may be used in accordance with the guidelines provided in the DSP&S Learning Disabilities Eligibility Model manual. While this may cause some problems for referring agencies, it is important to note that agencies and colleges have used procedures that vary widely, and that these LD eligibility procedures have been devised specifically for California Community Colleges in order to standardize the assessment and eligibility determination process and ensure equity across the state. There are efforts on the part of the Chancellor's Office to articulate eligibility with other systems and agencies. Thorough documentation of assessment and eligibility facilitates acceptance of student records between the California Community Colleges and other systems of post-secondary education and the State Department of Rehabilitation.

ASSESSMENT OF STUDENTS UNDER AGE 18

- How are students who are under the age of 18 assessed using the LD identification and eligibility procedures?

Whereas the original eligibility model did not include norms for students under the age of 18, the newly revised model includes norms from age 16. The LD specialist may, therefore, utilize test results that were obtained when the student was younger than 18. If the student is under 18 when he or she is referred to the LD program for services, and there is no previous testing, or the tests used for previous identification are not the same as those used in the CCC LD Eligibility Model, the LD specialist must gain the permission of the student's parents to assess the student.

Scores obtained from the Wechsler Intelligence Scale for Children (WISC) may be used in the Outside Assessment procedure under the assumption that the intercorrelation coefficients and the reliability coefficients are similar in magnitude to
those of the Wechsler Adult Intelligence Scale (WAIS). In addition, the student must have been at least 16 years of age when the instrument was administered.

**LD Program Eligibility for Minority Students**

- What is the validity of using ability and achievement scores with minority students and students from other underrepresented groups who may be LD and who have not had the opportunity to demonstrate true achievement or ability (components 2 and 3)?

In February of 1987, the Chancellor's Office of the California Community Colleges established a Task Force on Assessment and Bias as a part of the Statewide Learning Disabilities Project. The charge of the task force was to address this important question. The outcome work of this committee was a document and statewide training for LD specialists on sensitivity to cultural and linguistic differences in assessment. Additionally, the findings of the task force were incorporated into the LD eligibility training.

Furthermore, the Chancellor's Office was directed by staff of the Ways and Means Committee of the State Legislature to report on referral, eligibility, and provision of services for students participating in the colleges' learning disabilities programs. Annual reports were submitted between the years of 1987 and 1991 to the California Post-secondary Education Commission (CPEC) regarding the number of students, their ages, ethnicity and gender. In addition, the study made comparisons of students who were referred for possible learning disabilities, those who were considered for eligibility, and those who were served through LD programs in California Community Colleges. Although the study found that there were differences in referral rate among ethnic groups, with Native Americans being over-referred and Filipinos under-referred in relationship to their representation in the college population, once the referral group was established, no noteworthy differences were found across ethnic groups in terms of eligibility.

Guidelines for the assessment of Culturally and Linguistically Diverse (CLD) students are a part of the model and included in all trainings. The section includes background in demographics, understanding cultural differences, characteristics of second language acquisition, normal vs. disordered second language acquisition, and valid/reliable procedures for assessment of CLD students. Support materials including use of interpreters and translators in counseling and testing appointments are provided. Specialized materials to gather information during the assessment process as well as strategies specific to English language learners (ELL) and case studies are provided. Concerns about the potential impact on minority students resulting from changes to the eligibility model were discussed during the development phase of the most recent revision. The consultants who assisted the LD Field Advisory Group in this latest revision provided the group with information about possible differential impact on underrepresented groups. CARS-W will facilitate ongoing data collection and analysis to examine outcomes of the eligibility model and to provide information for adjustments to minimize any differential impact.
LD Program Eligibility and the Americans with Disabilities Act Amended (ADAA)

- Does ADAA require LD programs to serve students who have been previously identified or served as learning disabled by another institution or agency (e.g., a student who was diagnosed with a specific learning disability and served in resource programs in the K-12 system)?

According to the Americans with Disabilities Act Amended (ADAA), a qualified individual with a disability is any person that has a physical or mental impairment that substantially limits one or more major life activities and that has record of such impairment or has been regarded as having such impairment. If requested, it is the responsibility of the college to provide services to any individual who meets these criteria. Although not legally obligated to serve this population, Disabled Students Programs and Services (DSP&S) offices are usually given this responsibility on their campuses. Colleges cannot, however, request reimbursement for services provided to LD students who have not been determined eligible using the California Community Colleges Learning Disabilities Eligibility Model. It may be in the best interest of the LD specialist to reassess these students so that the program can be reimbursed for the services they require.

DSP&S Class Admittance

- Can only LD students be served in courses designed to serve students with learning disabilities?

Under the Education Code every class that does not have a prerequisite that meets Title 5 guidelines for prerequisites is an open class (Section 51006 of Subchapter 1 of Chapter 2 of Division 6.) These guidelines do not allow prerequisites such as "eligibility for learning disability services" or "consent of the LD specialist." In addition, classes cannot be designated "special" unless 50% or more of the students enrolled in the class have a verified disability and are registered with the DSP&S office. The program may add a departmental recommendation such as "designed for students with learning disabilities," to discourage students who are not disabled from enrolling in special classes, but they may not restrict enrollment to disabled students.

It is important to note that with the raising of academic standards and emphasis on the new course requisites and prerequisites, all community colleges will be reviewing each course in the catalog for compliance with the new Title 5 regulations regarding curriculum, Sections 55200-02 (Subchapter 1 of Chapter 6 of Division 6.) Local curriculum committees now have jurisdiction over approval of new courses including special classes designed for disabled students. Coordination between LD specialist, program coordinator, and supervising administrator is critical to ensure that courses already in place are in accordance with the new regulations, or, if necessary, are reviewed and revised in cooperation with the campus curriculum committee.
CURRICULUM REQUIREMENTS OF THE LD PROGRAM

- Can the LD specialist require that several courses be taken by an LD student as a prerequisite to continuing enrollment in the LD program and to receiving supportive services through DSP&S?

No. Specific LD courses may be required of LD students only if they are developed as prerequisites to additional courses in the program. Course prerequisites must meet the Title 5 guidelines for prerequisites and must be valid and necessary for participation in subsequent courses. Supportive services must be provided as a part of the student's educational contract and may not be denied if the student meets Title 5 regulations for eligibility as a disabled student. The LD specialist is not allowed to deny services to those who are making measurable progress, as defined by Section 56010 (Subchapter 1 of Chapter 7 of Division 6) of the Title 5 regulations governing DSP&S.

REPEATABILITY OF DSP&S CLASSES

- How many times may an LD student repeat a DSP&S class?

Recent changes to course repetition in Title 5 regulations permit the repetition of governing DSP&S authorizes districts to permit additional repetitions of DSP&S classes. Specifically, the regulation allows to students to petition to repeat DSP&S classes under any of the following circumstances:

(a) When continuing success of the student in other general and/or special classes is dependent on additional repetitions of a specific class;

(b) When additional repetitions of a specific special class are essential to completing a student's preparation for enrollment into other regular or special classes;

or

(c) When the student has a student educational contract which involves a goal other than completion of the special class in question and repetition of the course will further the achievement of that goal.

MEASURABLE PROGRESS

- What is the definition of measurable progress for an LD student?

As part of the student responsibilities set forth in Section 56010 of Title 5, students receiving services from DSP&S are required to make measurable progress. Measurable progress is determined individually for each student. Using the information gathered through the eligibility assessment process and other diagnostic procedures, goals are established by the LD specialist and the student that meet the specific academic and vocational needs of that student. These goals may specifically define the degree of
improvement in an academic or skill area or may more broadly specify the completion of a particular course or program of study. In either case measurable progress is determined by comparing the student’s achievement to the goal established in the SEC. If the student is enrolled in a regular course, the standards for measurable progress may not be more stringent than the academic standards established by the college pursuant to Subchapter 8 (commencing with Section 55750) of Chapter 6 of Division 6 of Title 5.

SERVING STUDENTS WITH OTHER DISABILITIES

• Can students with other disabilities be served in the LD program?

In order to receive support services in the LD program, a student must be appropriate for the program. That is, the student’s SEC must identify the specific educational limitations and strategies or interventions that are needed and that would be provided through the LD program. The LD assessment model is based on an underlying assumption that LD exists across the ability and disability spectrum. For example, a student with acquired brain impairment may exhibit a visual perceptual deficit for which an LD specialist may be able to provide an appropriate intervention. In that case, a particular LD service may be appropriate for that student.

• How does one assess LD as a secondary disability?

Some students may exhibit educational limitations related to multiple disabilities. For example, a student with a physical impairment may also have limitations related to a processing deficit that is not attributable to their primary disability. In these cases the individual may possess a secondary disability for which accommodations are necessary.

With regard to assessing students with other disabilities, the LD specialist is responsible for verifying any primary and/or secondary disability designated as LD. The LD specialist may or may not do comprehensive testing on a student whose secondary disability is LD. This depends on the expertise of the LD specialist in judging whether there is enough assessment information on file to develop an appropriate Student Educational Contract (SEC) denoting strategies and interventions appropriate for this student, in accordance with the goals and objectives of the particular LD special class or support service provided. The point here is appropriateness of the particular student to be served in the LD program.

LD cannot exist as a secondary disability for funding purposes for students who have been referred to the LD program but who were previously verified with an Intellectual Disability (ID) or students with acquired brain impairment (ABI). Since ID, LD and ABI are neurologically based impairments, it is currently not possible to determine whether these conditions may co-exist or the degree to which each contributes to the student’s educational limitations.

VERIFICATION OF STUDENTS WHO WITH INTELLIGENCE DISABILITIES (ID)

• Who is qualified to assess and verify an Intellectual Disability (ID)
Those qualified to assess and verify ID include the DSP&S Counselor, LD specialist, or Coordinator. The LD specialist may provide an assessment to assist in this verification. Documentation may also include Outside Assessment (e.g., documentation of prior diagnosis or service by Regional Center, Department of Rehabilitation, special education, or sheltered employment), and the student should be referred to the college's DSP&S program.

**APPROPRIATE USE OF INDIVIDUAL ASSESSMENT INSTRUMENTS**

- *Can the LD specialist administer the Woodcock-Johnson Tests of Cognitive Ability and Achievement as group tests?*
- *Can the Wechsler Adult Intelligence Scale be used as a pre- and post-test?*
- *What group tests are appropriate?*

No, the Woodcock-Johnson Tests are *individually administered* with norms based on individual administration. The Woodcock-Johnson Tests of Cognitive Ability and the Wechsler Adult Intelligence Scale should never be administered in a group setting; if they are, test results would not be valid. In addition, ability tests such as the WAIS are not generally used as pre- or post-tests since it is assumed that the construct of ability remains fairly stable throughout life for each individual. Most group and individual achievement tests that are normed for adults would be appropriate to use as pre- and post-tests. The *DSP&S Learning Disabilities Eligibility Model* manual provides a discussion of tests used in the model that may be administered in a group setting. Only those assessments may be considered for group use.

**STANDARD ERROR OF MEASUREMENT**

- *When may the standard error of measurement be used?*

The standard errors of measurement (SEM) for each test used in the LD eligibility model may be found in the *DSP&S Learning Disabilities Eligibility Model* manual. The SEM may be used *only* for Ability Level Components (components 3.0). In Component 3.0 if the student's standard score is less than 85 the SEM may be added to the student's earned standard score. Because of the multiple changes in this revision of the LD eligibility model, a decision was made to require the addition of the SEM for aptitude scores below 85 to avoid an adverse impact on students who would previously have been identified as LD under the prior version of the model where the criterion score for aptitude was 80. This requirement will remain in place until appropriate data analyses have been completed.
This case study demonstrates the use of the eligibility criteria and procedures utilized in the LD Eligibility Model. In this case study, a referral is worked through each of the six components in the model. The intent of this exercise is five-fold:

- To model the use of the California Community Colleges LD Eligibility Model.
- To model the procedures used in the eligibility evaluation process.
- To demonstrate the use of the assessment and scoring procedures and the Intake Screening and Eligibility Record found in the DSP&S Learning Disabilities Eligibility Model manual, hereinafter referred to as the LD Eligibility Manual.
- To demonstrate the correct use and interpretation of the tests used for evaluation.
- To show how the Eligibility Recommendation component is used to analyze and interpret the test results.

The name of the individual described in the following case is fictitious, but this case represents an adult referred for LD evaluation in a typical community college. It is presented from the perspective of the community college learning disabilities specialist. The six components of the LD Eligibility Model are described below.

At the time of referral, Shelly had been attending a California community college for five semesters. Previously, she had been enrolled in a college study skills course, and her instructor suggested that she consider being assessed for LD services. At the time of referral, Shelly was 26 years old. She indicated that she felt she had a hard time with school and had always felt "behind" other students.

1. Intake Screening Component

At her first appointment, Shelly was told about the college's LD program and was asked to sign the consent form in the Intake Screening and Eligibility Record, thereby giving her consent to proceed with the evaluation process.

The LD Specialist completed the intake interview and reviewed it with Shelly. Her responses to the Intake questions indicated that she had successfully completed approximately 40 units of college coursework. She reported that she had received speech services in elementary school, but despite always feeling like she "was behind everyone else", had never been enrolled in special education classes. She reported that her sister had had a reading problem when she was younger and that she (Shelly) had received corrective vision treatment to strengthen a lazy eye. She also indicated that she presently experiences problems with concentration. Her stated goal was to complete her general education requirements for her Associate's degree, but she had not declared a major at that time. After the LD Specialist signed off on the first component, the next component, Measured Achievement, was assessed.
2. Ability Level Component

The Ability Level component is designed to assess the current ability of the student to achieve in the community college setting. The Wechsler Adult Intelligence Scale was administered to assess Shelly's ability level. Shelly's strongest score was on the Perceptual Reasoning Scale. She received a standard score of 99. When compared with other adults within her normative group, Shelly's performance abilities fell within the average range. Procedural and administrative validity checks were positive. Since Shelly's score of 99 exceeded the criterion score of 85, she met the criterion for component 2.0. The examiner recorded her scores in the Intake Screening and Eligibility Record and proceeded to the fourth component, Processing Deficit.

3. Processing Deficit Component

The Processing Deficit Component is intended to identify information-processing deficits, which are likely to be the basis of a learning disability. Shelly was assessed for a processing deficit using the Wechsler Adult Intelligence Scale. Her subtest, scaled, and factor scores were calculated using the Examiner's Manual and the tables contained in the LD Eligibility Manual.

The scores for the Verbal Comprehension, Perceptual Reasoning, GIA, and Full Scale in addition to index scores for Processing Speed, and Working Memory were analyzed. To find the difference score, the Verbal Comprehension score was subtracted from the Perceptual Reasoning Scale score, resulting in a difference score of 18 points. Shelly's difference score exceeded the established criterion scores of 15. Shelly demonstrated a statistically significant discrepancy between her verbal and non-verbal abilities, with the latter representing an area of relative strength and the former an area of relative weakness. These processing deficits would account for many of the problems Shelly experiences in school. She does not process information, particularly verbal information, as efficiently as the average person. Procedural and administrative validity checks were positive. Having met the criteria for multiple processing deficits, Shelly's test scores were recorded in the Intake Screening and Eligibility Record, and the examiner proceeded to the Aptitude-Achievement Discrepancy Component.

4. Aptitude-Achievement Discrepancy Component

The Aptitude-Achievement Discrepancy Component represents a comparison between measures of aptitude and achievement. This comparison provides evidence of how much an individual is achieving in relation to expected achievement. To assess the aptitude-achievement discrepancy, an aptitude and an achievement test were selected and the results compared. Shelly's standard score on the Perceptual Reasoning Index of the Wechsler Adult Intelligence Scale was 99. On the spelling subtest of the WJ-A, she had a standard score of 73. Using the appropriate table in the LD Eligibility Manual, the examiner selected the table comparing the Perceptual Reasoning Index with select achievement scales. Shelly's discrepancy score of 26 was greater than the criterion score of 17, thus meeting the component's criteria. The procedure was considered valid. After
recording Shelly's score in the Intake Screening and Eligibility Record, the LD specialist proceeded to the Eligibility Recommendation Component.

5. Eligibility Recommendation Component

The final step in the LD Eligibility Model is the Eligibility Recommendation Component. At this step in the process, it is the examiner's job to systematically compare and judge the consistency and patterns across all of the information collected in components 1.0 through 4.0. The Eligibility Recommendation is based on the reliability of the test results in the other components, testing conditions, and characteristics of the student that may have affected test performance.

In Shelly's case, meeting the eligibility criterion for each component was a positive indicator of a learning disability. Furthermore, validity checks showed the procedures to be accurate and fair measures of Shelly's abilities. No better alternative explanations could be found for Shelly's academic deficits and processing problems than a learning disability. For these reasons, the LD specialist recommended that Shelly be eligible for community college learning disability services. The LD specialist recorded the determination in the Intake Screening and Eligibility Record, signed the eligibility recommendation, reviewed the results and the eligibility recommendation with Shelly, and obtained her signature on the component. The final step was to complete the form identifying Shelly's educational limitations and documenting recommended accommodations and compensatory strategies.