

Disability Documentation, the Americans with Disabilities Act Amendments Act, and the Summary of Performance: How are they linked?

Stan F. Shaw
Walter R. Keenan
Joseph W. Madaus
Manju Banerjee
University of Connecticut

Abstract

Disability documentation has been an ongoing challenge for Office for Students with Disabilities personnel. Initial lack of consistency and inadequate documentation data resulted in the promulgation of detailed documentation guidelines in the 1990s. Discontinuity between approaches to transition assessment and disability documentation in secondary and postsecondary schools has been exacerbated by court decisions and divergent legal requirements. The recently implemented Americans with Disabilities Act Amendments Act (2008) significantly impacts the postsecondary disability documentation process. The Summary of Performance (SOP) requirement of IDEA 2004 is discussed in regard to the range of data it adds to the review of functional performance and determination of reasonable accommodations. Recommendations regarding the application of the SOP to the new reality of disability documentation are presented.

“Policy is not a static commodity. It is a dynamic road map that periodically should be reviewed within the context of legal precedents, evolving developments in the field, and emerging ‘best practices.’” (Brinckerhoff, McGuire, & Shaw, 2002, p. 248).

There is no issue in postsecondary disability services where that statement is more apropos than in regard to disability documentation. There have been major differences among postsecondary institutions in regard to what constitutes acceptable documentation for various disabilities. There are significant discontinuities between secondary and postsecondary institutions in regard to the use, recency, emphasis, and comprehensiveness of documentation data necessary to determine a disability and the need for accommodations. Policy has also been impacted by conflicting legal mandates between the prescriptive Individuals with Disabilities Education Act (IDEA) in public schools and the more generic requirements of Section 504 of the Rehabilitation Act of 1973

in postsecondary education. In addition, court rulings related to what constitutes a major life activity and the role of mitigating measures have further “muddied the waters.” Combined, each of these issues has contributed to major changes in perspective related to disability documentation over the past 15 years.

What is not in doubt is the divide between secondary and postsecondary institutions regarding assessment of disability and documentation policies. This disconnect has frustrated professionals, confused consumers, and undermined the agreed upon intent to provide equal access to college for students with disabilities. In the past five years, the confluence of two significant legal events related to students with disabilities, namely the reauthorization of the IDEA (2004) and the passage of the Americans with Disabilities Act Amendments Act (ADAAA, 2008) have attempted to clarify the appropriate use of and need for disability documentation. These changes have impacted the interaction of the assessment data provided by secondary schools and how postsecondary institutions determine eligibility for services

and need for accommodations. As of January 1, 2009 substantial revisions in the ADA, and, as a result, Section 504, have statutorily spelled out the legal requirement for establishing a “substantial impairment” of a major life activity. The strict interpretation of a substantial impairment has been broadened and now includes a more expansive definition of major life activities requirement, including additional major life activities. It has now become a very broad and liberal threshold requirement (Keenan, 2009). Professionals working in the Office for Students with Disabilities (OSD) need to be aware of these changing dynamics and take a leadership role in reviewing and modifying their policies and procedures as needed.

Secondary/Postsecondary Disconnect

The ADA/Section 504 as applied to institutions of higher education mandates equal access to educational opportunities for “otherwise qualified” individuals with documented disabilities—not the Free and Appropriate Public Education (FAPE) as required for all students with disabilities in public schools (Shaw, Madaus, & Dukes, 2010). Students with disabilities and their families are often surprised to discover that the Individualized Education Program (IEP) mandated by the IDEA or a high school Section 504 plan does not serve as sufficient documentation for accommodations and services in college (Madaus & Shaw, 2004). Some parents are even unaware that IDEA simply does not apply in postsecondary settings. In addition, students may not receive the exact accommodations in college that they received in high school (Shaw, 2006). IDEA 2004 amendments, that have now restructured the nature and extent of formal assessment previously provided to students with disabilities, may result in increasing challenges for students and families in gathering the assessment data needed to qualify for supports and accommodations in postsecondary education settings (Madaus & Shaw, 2006). For example, many postsecondary institutions require documentation that is time sensitive for specific disabilities and identifies current functional limitations and substantial impairment to a major life activity. However, IDEA 2004 amendments no longer require school districts to complete a full re-evaluation of students every three years, if the student’s condition has not changed. Such evaluations may be updated if the IEP team determines it is necessary, but many school districts facing fiscal constraints may be unwilling to pay for assessments that are not mandated

by federal legislation (Shaw et al., 2010).

The problem of procuring disability documentation that meets established postsecondary guidelines is exacerbated by different expectations in regard to what constitutes appropriate assessments on the part of secondary and postsecondary schools. Secondary schools are focusing less on formal testing and more on monitoring student progress (i.e., the collection of performance-based information regarding abilities and limitations), such as Response to Intervention (RTI), Positive Behavior Supports (PBS), and curriculum-based assessment, to serve a variety of students’ needs in inclusive settings (Kovaleski & Prasse, 2004; National Joint Committee on Learning Disabilities, 2005). IDEA 2004 encourages more schools to use this data for determining disability rather than relying on psycho-educational evaluations. While more K-12 schools may use RTI/PBS data to diagnose a disability, postsecondary documentation guidelines (Brinckerhoff et al., 2002) have uniformly called for comprehensive psycho-educational or neuropsychological evaluations to establish the presence of a specific disability and to document a student’s current need for accommodations.

Postsecondary disability service providers may lack the training, background, or experience in understanding assessment instruments (Ofiesh & McAfee, 2000). A recent study of disability service providers indicated that only 27% received their training in reading documentation from their academic program. The vast majority (65%) received this training via professional conferences, while 9% reported not having any training in this area (Madaus, Banerjee, & McGuire, 2009). Postsecondary personnel typically adhere to documentation guidelines that specify the needed information. Documentation guidelines, such as those developed by the Association on Higher Education And Disability ([AHEAD], 1997) and the Educational Testing Service ([ETS], 1998), were intended as frameworks to assure adequate disability documentation and foster an appropriate match between student needs and accommodations (Madaus & Madaus, 2001). A productive outcome of these guidelines had been the provision of accommodations and services only to students who have documented disabilities as specified in ADA/Section 504.

As a result of growing concerns that the “guidelines” were being rigidly applied, however, AHEAD withdrew its guidelines and posted in its place a set of best practices (AHEAD, n.d.). Nevertheless, 40% of the respondents in the Madaus et al. (2009) study

still reported using the AHEAD Guidelines, 22% used the AHEAD Best Practices, and 24% reported using institution specific guidelines. An additional 7% used ETS Guidelines. Unless the discontinuities in disability documentation between secondary and postsecondary education are fully addressed, parents and students will continue to be caught in the schism between these entities that want to foster transition, not create barriers (Banerjee & Shaw, 2007; Shaw, 2005; 2006).

Americans with Disabilities Act Amendments Act (ADAAA)

The ADAAA of 2008 provides a much broader definition of who is an individual with a disability. The ADAAA specifies that the term “major life activities” includes, but is not limited to caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. Furthermore, major life activities include major bodily functions, including but not limited to functions of the immune system; normal cell growth; digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions (Keenan, 2009).

Congress amended the statute to include nonexclusive examples of major life activities and major bodily functions that are considered to be major life activities. These examples were not present in the statute prior to the ADAAA. The definition of disability set forth in the ADAAA specifies that disability shall be construed in favor of broad coverage of individuals to the maximum extent permitted. The term “substantially limits” shall be interpreted consistently with the findings and purposes of the ADAAA. An impairment that substantially limits one major life activity need not limit another major life activity to be considered a disability. Episodic or in remission impairments are still considered disabilities if they would substantially limit a major life activity when active. Determination of substantial limitation shall be made without regard to ameliorative effects of mitigating measures, which includes medication, medical supplies, equipment or appliances, low-vision devices (but not glasses or contact lens), prosthetics, hearing aids/cochlear implants or other implantable hearing devices, mobility devices, or oxygen therapy equipment and supplies, use of assistive technology, reasonable accommodations or auxiliary aids or services, or learned behavioral or adaptive modifications. However, ordinary eyeglasses or contact lens shall be considered

in determining whether the impairment substantially limits a major life activity (Keenan, 2009).

The implication is that entities will not be able to selectively choose evidence or data from disability documentation, that is, “cherry pick” to either substantiate or refute eligibility as an individual with a disability or the request for reasonable accommodations (Heyward, 2009). A determination of disability is now only a threshold issue. The next consideration is to look at the disabling condition as it impacts the current functional capacity of a student. The ADAAA now requires that the impact on functional capacity must be determined without consideration of mitigating measures. The focal point is the impact of the disability on a student’s capacity to perform academic related tasks. As always, assessment of functional impact and residual functional capacity must be documented. Objective documentation is necessary to evaluate functional deficit to assist in determining appropriate accommodations.

The original intent of the ADA was to protect the civil rights of people with disabilities to ensure equal access and opportunity. Congress did not intend to impose an extensive legal analysis as to whether a person is disabled within the parameters of the ADA. In other words, the issue of whether a person has a disability was intended to be a threshold point for ensuring non-discrimination. However, judicial interpretation by the Supreme Court and lower federal courts, altered the original intent of Congress and implementation of the ADA. Restrictive analysis by the Supreme Court requiring a severe limitation in activities of central importance to most people’s daily lives, and having to take into consideration mitigating measures, should not be the focus of analysis when addressing claims under the new ADAAA.

The purposes section of the ADAAA explains the intent to reinstate a broad scope of protection under the ADA, and a rejection of the 1999 *Sutton v. United Air Lines* requirement that ameliorative effects of mitigating measures must be considered in determining substantial impairment of a major life activity. The ADAAA further rejects the standards enunciated in *Toyota Motor Manufacturing Kentucky v. Williams* (2002) that the terms “substantially” and “major” in the definition of disability under the ADA “need to be interpreted strictly to create a demanding standard for qualifying as disabled.” It also rejects the interpretation that to be substantially limited in performing a major life activity “an individual must have an impairment that prevents or severely restricts

the individual from doing activities that are of central importance to most people's daily lives" (*Toyota Motor Manufacturing Kentucky v. Williams*, 2002, p. 198). The standard in *Toyota* for substantially limits applied by the lower courts has created an inappropriately high threshold of limitation necessary to obtain coverage under the ADA. The intent of the ADA is that the primary object of attention of cases brought under the ADA should be whether the entities subject to the ADA have complied with their obligations under the law. The question of whether an individual's impairment is a disability under the ADA should not demand extensive legal analysis (Keenan, 2009).

The ADA thus restores the original intent of the ADA that the focus should be whether an individual with a disability, which was intended to be a very broad category, is being granted equal access through reasonable accommodations and modifications (i.e., is not being discriminated against by the entity subject to the provisions of the ADA). The broad standard is demonstrating that the person has a disability (i.e., substantial limitation of a major life activity but under the new more broadly defined ADA standard). Once disability is established, it is incumbent on the entity to consider reasonable accommodations and modifications to ensure equal access. This new statutory definition of disability, as opposed to the former judicially imposed definition of disability, creates a substantial change in how eligibility as an individual with a disability is determined (Shaw, et al., 2010). This change in the ADA addresses the issue of who is deemed to be an individual with a disability under the statute. There is no change in terms of assessment of the functional impact of a disabling condition and the determination of reasonable accommodations.

The New Focus of Disability Documentation

Disability services providers will now be hard pressed to find that a student who received services under IDEA or Section 504 in high school is not an individual with a disability under ADA. However, postsecondary disability service providers will continue to require documentation to determine disability. Additionally, functional impact of the disabling condition must be documented to determine reasonable accommodations. The focus of analysis will shift to determining the functional impact of the disability as opposed to whether the person is an individual with a disability. Disability is determined first and then functional impact related to the specific disability is evaluated to determine the need

for accommodations. In other words, disability documentation guidelines may not change, but the emphasis within documentation review will be altered (Heyward, 2009). As prior to enactment of the ADA, appropriate use of documentation should always be required to identify functional impact in determining academic accommodations. Eligibility for protection under the ADA will be weighted more by the appropriateness or reasonableness of a requested accommodation, rather than disability status. The determination of reasonable accommodations is separate from determining disability status. Assessment of the need for accommodations continues to be based upon analysis of the functional impact of a student's disability. A narrow interpretation of substantial limitation will no longer be an impediment to invoking protection under the law. Disability services providers at postsecondary institutions will have to rethink approaches to the ongoing debate about the adequacy of disability documentation for eligibility.

Documentation standards that question the presence of a previously diagnosed disability or require a strict statement of disability diagnosis may be found to contravene the new standards set forth under the ADA. Likewise, documentation standards that arbitrarily require "current" documentation and ignore valid prior disability evaluation data may run afoul of the liberal definition of disability under the ADA. However, the age of documentation is still an important consideration. The current functional impact of disability is key in determining the need for accommodations. All evaluations of disability, regardless of when they were performed, should provide objective evidence of functional impact. Simply having a statement of a diagnosis is inadequate. Postsecondary disability service providers must continue to request and review documentation. The issues of mitigating measures and remission/exacerbation of a condition, on the other hand, may no longer be viewed to negate a determination of disability under the ADA.

The focus of legal analysis will be whether entities subject to the ADA/Section 504, including postsecondary education institutions, are discriminating against individuals on the basis of disability. Students with disabilities who meet the broader disability definition will be eligible for reasonable accommodations and modifications. Strict documentation requirements regarding eligibility of disability status may violate the new ADA/Section 504 standards, especially by requiring current documentation for students who have a record of disability that is arbitrarily deemed by the postsec-

ondary institution to be too old. For example, the data reported by Madaus et al. (2009) indicated that 44% of respondents stated that it was “required” that measures of aptitude be less than 3 years old, while 51% reported that it was required that measures of achievement be less than 3 years old. Such standards may require reanalysis. Eligibility under the ADA/Section 504 is now a lower threshold requirement. The current functional impact of a student’s impairment should increasingly guide postsecondary disability services providers in determining reasonable accommodations and modifications. In other words, service providers will need to seek relevant evidence of functional limitations due to the disability. The data collected in schools implementing the school-wide support models, particularly Response to Intervention and Positive Behavior Supports, will provide a great deal of useful information on the academic and behavioral impact of the student’s disability (Shaw, et al., 2010)

Determination of Eligibility and Reasonable Accommodations Under the ADA

It may be argued that the perennial “floodgates” will be opened and the cohort of students with disabilities receiving academic accommodations will increase. However, the original intent of the law still prevails. The impact of an individual’s disability on functional ability should be the focal point of the determination as to what is a reasonable academic accommodation. The critical issue then becomes the determination of the impact of a disability on a student’s functional performance, and demonstration of the need for a specific accommodation. Determination of accommodations by service providers will need to be more nuanced than in the past. Postsecondary service providers will need to look beyond standardized scores as derived from a diagnostic battery to consider historical evidence attesting to the use or lack of use of accommodations and discussion of why accommodations may not have been necessary previously, but are currently needed (Banerjee & Shaw, 2007). Students receive a Summary of Performance (SOP) document when they graduate from high school. Disability service personnel in postsecondary settings need to consider whether the SOP can provide data on the appropriateness of accommodations.

The Summary of Performance

Most high school students with disabilities receive special education and related services under IDEA. Upon transition to a postsecondary education institu-

tion, these students no longer receive services through IDEA, yet may be eligible for academic accommodations under Title II or Title III of the ADA, depending on whether they attend a public or private postsecondary institution, or under Section 504. Documenting a disability for eligibility for academic accommodations at the postsecondary level can be difficult and may impose a serious impediment for high school students with disabilities arriving at college. Traditionally students transitioning from high school have been able to obtain triennial updates to their disability documentation prior to graduation in preparation for college. An update to a psycho-educational evaluation report, however, may no longer be available. The SOP may become one of the few elements of disability documentation now available to graduating seniors (Madaus & Shaw, 2006). Amendments to IDEA in 2004 require a newly mandated mechanism for transition from secondary to postsecondary education, which is commonly referred to as a SOP. The law states that high schools “shall provide the child with a summary of the child’s academic achievement and functional performance, which shall include recommendations on how to assist the child in meeting the child’s postsecondary goals.” (Individuals with Disabilities Education Act [IDEA], 2006/2007).

Can the SOP document be utilized by postsecondary disability services personnel to document a qualifying disability for purposes of providing academic accommodations under the ADA/Section 504? Some would suggest that the answer is in the affirmative, that students who transition to postsecondary education from secondary education with a comprehensive SOP will present strong evidence of the current functional impact of a disability for determining reasonable academic accommodations under the ADA/Section 504. A well-constructed and comprehensive SOP is a blueprint that provides past evidence of the academic accommodations that have been utilized, and the extent to which such accommodations have been effective.

The SOP, a required document for all special education students graduating with a regular diploma or aging out of school under IDEA 2004, has the potential to be an important piece of documentation for the postsecondary institution to consider in making academic accommodation decisions under the ADA/Section 504. The IDEA statute and regulations mandate that the SOP must contain a summary of academic achievement and functional performance. However, there is no further specificity concerning the scope or format of an SOP.

Prior to implementation of the SOP regulations, experts in the field from both secondary and postsecondary education held a series of national summit meetings to address the issue of designing a comprehensive SOP that would provide useful documentation to postsecondary education institutions. It resulted in the development of a National Template SOP Form (Shaw, Kochhar-Bryant, Izzo, Benedict, & Parker, 2005) that can provide much information useful at the postsecondary level in documenting a disability and current functional limitation of the student's ability to learn (Madaus & Shaw, 2006). This National SOP Template was approved by many national organizations including the Council for Exceptional Children (CEC), Learning Disability Association of America (LDA), Higher Education Consortium for Special Education (HECSE), and the Council for Learning Disabilities (CLD).

The key to this documentation is the thoroughness and elaboration of detail that is employed by high school professional personnel in completing the SOP. Again, for purposes of meeting the legal standards under the ADA/Section 504, the focus of documentation presented to the postsecondary education institution should be on the current functional limitation imposed by the student's specific impairment. The ADA makes it clear that the focus is not so much documenting the existence of a qualifying disability, but rather the functional limitations that are imposed by the disability. The SOP can provide a specific and clear statement of how the student's functional level is affected. For example, a student with AD/HD may be substantially limited in his or her ability to sit and concentrate for periods in excess of 30 minutes, affecting the ability to take exams or lecture notes for periods in excess of this time limit (See Banerjee & Shaw, 2007, for a comparison of similarities and differences between the SOP national template and a psycho-educational evaluation report).

Information that is specific and objective, and documents the student's functional levels as a senior in high school should readily transfer over to the postsecondary level as documentation of a substantial limitation to learning. The National Template SOP form provides information pertaining to the student's current levels of performance in the domains of academic, cognitive, and functional skills. Dukes, Shaw, and Madaus (2007) describe how the productive data on student progress and performance collected through efforts such as Response to Intervention, Curriculum-Based Assessment

and Positive Behavior Supports can be captured in this section of the SOP. Data such as student performance using different accommodations or the utility of varying amounts of extra time can provide substantial information that describes current functional limitations and need for accommodations that can be interpreted and considered by the OSD.

Once postsecondary personnel establish the functional impact of the disability in the postsecondary setting, the logical sequential analysis is to then determine the reasonable academic accommodations that will be effective in ameliorating the limitations of a student's disability. The National Template SOP form also provides information about accommodations, modifications, and assistive technology the student has received that were essential for participation in high school. This information specifically documents the academic accommodations that were utilized in high school. The template SOP form goes on to provide "Recommendations to Assist the Student in Meeting Postsecondary Goals" to enhance access to education in the postsecondary environment. This is also a requirement of the IDEA 2004. The National Template notes that secondary personnel and consumers need to be aware that postsecondary education personnel have different expectations and obligations than secondary schools. It is, therefore, clear that the specified accommodations or supports are just recommendations that do not limit the independent decision-making of personnel from the Office for Students with Disabilities. It is important to note that if a comprehensive SOP is part of disability documentation, it has great potential to specify functional limitations imposed by a student's disability, and further demonstrate academic accommodations that have been effective in the past (Banerjee & Shaw, 2007).

To what extent are the SOP's being presented to OSD personnel likely to provide the information that has been discussed? Are personnel from the OSD interested in encouraging the development of SOP's that can be used as a key element of this new approach to disability documentation with its focus on determining accommodations? A recent study on the implementation of the Summary of Performance reviewed SOP forms developed by 43 states (Miller, Madaus, Shaw, Banerjee & Vitello, 2009). Preliminary data indicates almost 90% of the state forms included all three elements required by IDEA 2004: (a) a statement of academic achievement; (b) a statement of functional performance; and (c) recommendations to help the student achieve post-

secondary goals.

In regard to the National Template, 21% of the states not only adopted the Model SOP template but also attributed their form to the National Summit. More than half include a description of the student's disability and present levels of accommodations and assistive technology in academic, cognitive, and functional areas and 40% require attaching disability documentation that are requested in the Model SOP form. These data suggest that SOP's from many states can provide the data needed under ADAAA to describe functional limitations and indicate a history of accommodations. A challenge for postsecondary service providers would be to work with secondary schools and states in their area to encourage use of productive SOP's.

Just as some K-12 schools and State Education Agencies have been reluctant to implement comprehensive SOP's because of the time commitment involved, some postsecondary institutions have been reticent to accept the SOP. At several discussions with hundreds of postsecondary disability service providers many concerns were raised (Shaw & Parker, 2006). There were issues related to not wanting to be "subject" to IDEA when it had no standing in postsecondary education. Postsecondary personnel indicated their comfort with the current disability guidelines and the use of psycho-educational assessment to make documentation decisions. They did not believe that the data provided by the SOP would be helpful or objective enough to support documentation decisions. In a statement by the AHEAD Board related to the SOP, it was noted that the "Board feels that the SOP should provide meaningful information, while maintaining the integrity and independent decision-making of professionals in higher education, in order to insure that DSS service providers can be effective" (AHEAD, 2005, p. 1). It may be time for postsecondary personnel to reconsider the value of the SOP and work with secondary schools and states to enhance the utility of the SOP given the changes to the ADA/Section 504.

The new ADAAA has made adherence to rigid documentation guidelines no longer legally defensible. In this light, the information provided in a comprehensive SOP becomes more relevant. AHEAD's (n.d.) recent "Best Practices" in disability documentation notes that documentation must both establish disability and "provide adequate information on the functional impact of the disability so that effective accommodations can be identified" (p. 2). In that document, AHEAD specifies

documentation principles that include a call for flexibility "allowing for the consideration of alternative methods and sources of documentation" (p. 4). The "Best Practices" specify seven elements of quality documentation including a call for a "description of current functional limitations," a "description of current and past accommodations" and "recommendations from professionals with a history of working with the individual" (pp. 6 & 7). Since not all states have comprehensive SOP forms and others allow local school districts to use their own forms (Miller, et al., 2009), it would be productive for AHEAD, AHEAD state affiliates and postsecondary disability personnel to work with state departments of education and local schools to implement an SOP that will be useful for documentation decision making. They can jointly review the National Template SOP (2005), an example of a potentially useful SOP model, freely available at the Council for Exceptional Children (2006) web site. Comprehensive SOP's are available at state department of education special education web sites in Iowa, Connecticut, Wisconsin, and California; local schools (see <http://www.vase.k12.il.us/Forms/sop.html>) can also be useful starting points for collaboration. Given the importance of self determination for students with disabilities attending college (Field, Sarver, & Shaw, 2003) a student-directed SOP can be a valuable tool (Martin, VanDyke, D'Ottavio, & Nickerson, 2007). The Oklahoma Department of Education has an example of an SOP that features student involvement (http://sde.state.ok.us/Curriculum/SpecEd/pdf/Docs_Forms/English/Form_15.pdf). Meetings between state AHEAD chapters and the state department of education transition coordinator could lead to productive revisions of SOP forms and mutual understanding of transition documentation. At the same time, postsecondary institutions should heed AHEAD's call to review "documentation practices every 3-7 years in order to consider innovation in the art and instrumentation of disability evaluation, evolving professional practices, and changes in the legal landscape" (AHEAD, n.d., p.1).

Conclusion

Under federal law, postsecondary education students with disabilities have legal rights to reasonable academic accommodations. However, between 1999 and 2008 the Supreme Court and lower federal courts applied restrictive legal standards contrary to original congressional intent. Beginning January 1, 2009, these restrictive judicial interpretations have been explicitly addressed

by Congress through implementation of the ADA. Specifically, the definition of disability under the ADA/Section 504 and what constitutes a substantial limitation of a major life activity has new meaning. A more relaxed legal standard is now in place to establish eligibility for reasonable academic accommodations in postsecondary education. These changes in the law provide both students and postsecondary disability service providers with alternatives that go beyond traditional disability documentation to ensure non-discrimination and equal access to academic opportunities. While we are certainly not saying that the SOP is the only necessary piece of disability documentation, we are recommending that a comprehensive SOP should be considered a significant element of documentation.

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About the Authors

Dr. Stan F. Shaw is Senior Research Scholar and Associate Director at the University of Connecticut's Center on Postsecondary Education and Disability. He is the lead author for *Preparing Students with Disabilities for College Success: A Practical Guide for Transition Planning* published by Brookes in 2010. His areas of interest are transition to postsecondary education, postsecondary services for students with disabilities and special education law.

Walter R. Keenan, J.D., is an Associate Research Scholar at the Center on Postsecondary Education and Disability, and Adjunct Professor in the Department of Educational Psychology, in the Neag School of Education at the University of Connecticut. His primary areas of interest are transition to postsecondary education, legal rights and obligations under the ADA and Section 504 and documentation of learning disabilities and AD/HD.

Joseph W. Madaus, Ph.D., is the Director of the Center on Postsecondary Education and Disability, and an Associate Professor in the Department of Educational Psychology, in the Neag School of Education at the University of Connecticut. His research and publication interests include documentation of learning disabilities, transition, assessment, and postschool outcomes of adults with LD.

Dr. Manju Banerjee is a Senior Research Scholar in the Center for Postsecondary Education and Disability, and the Associate Director of the Center for Students with Disabilities at the University of Connecticut. Her primary areas of research and interest are disability documentation guidelines, universal design for instruction and assessment, high stakes testing, transition to postsecondary education, and research methods.