**Guidance for Universities on Adapting to Changes in Secondary Education Documentation for Students with Disabilities**

Recent shifts in how disabilities and special educational needs (SEND) are documented and accommodated at the secondary level have significant implications for higher education institutions. These changes, aimed at providing more equitable access to learning support, reduce the reliance on formal documentation from clinical professionals for accessing accommodations. As such, universities must adapt their policies and practices to accommodate students transitioning from secondary education without traditional forms of disability documentation.

**Understanding the Changes**

**Transition from Clinical to Educational Assessments**

* **Shift Focus**: Secondary education in Ireland is moving towards educational assessments (Assessment of Educational Need - AON) to determine the need for accommodations, reducing the emphasis on clinical diagnoses.
* **Impact on DARE and Other Access Schemes**: This shift may affect eligibility criteria for schemes like the Disability Access Route to Education (DARE) and the provision of reasonable accommodations in higher education.

**Reasonable Accommodations at Certificate Examinations (RACE)**

* **Long-term Accommodations**: If accommodations are granted at the Junior Certificate level, there’s an assumption they will continue through the Leaving Certificate, pending need verification, simplifying the process and reducing the burden on students and families.

**School Inclusion Model**

* **Timely and Relevant Support**: The new model emphasizes support based on individual needs rather than a disability diagnosis, aiming for immediate access to support.

**Guidance for Universities**

**Adapting Admission and Support Systems**

1. **Review Admission Criteria**: Universities should consider how changes in secondary education documentation impact admission criteria, particularly for access schemes like DARE.
2. **Flexible Documentation Requirements**: Develop more inclusive documentation requirements that accept various evidence types, including statements of accommodations from secondary schools and AON reports.

**Enhancing University Disability Services**

1. **Broaden Acceptance of Evidence**: Train staff to recognize and accept a broader range of documentation for disability support services.
2. **Proactive Engagement**: Establish proactive engagement strategies with incoming students to identify those who may require accommodations based on their secondary education experiences.

**Implementing Universal Design for Learning (UDL)**

1. **Incorporate UDL Principles**: Revise curricular and instructional designs to incorporate UDL principles, ensuring that learning environments accommodate a wide range of learners.
2. **Faculty Development**: Provide faculty with training and resources to implement UDL in their teaching practices effectively.

**Collaborating with Secondary Education Stakeholders**

1. **Establish Communication Channels**: Create formal channels for communication and collaboration with secondary education institutions to facilitate a smooth transition for students requiring accommodations.
2. **Share Best Practices**: Engage in the exchange of best practices with secondary education providers regarding the assessment and accommodation of students with SEND.

**Policy Review and Continuous Improvement**

1. **Regular Policy Review**: Regularly review and update policies related to disability support and accommodations to ensure they reflect current practices in secondary education and legal requirements.
2. **Stakeholder Feedback**: Incorporate feedback from students, faculty, and disability services staff into policy revisions to ensure that accommodations effectively support students' needs.

**Supporting Transitioning Students**

1. **Transition Support Programs**: Develop and offer transition support programs for incoming students with disabilities to orient them to university-level accommodations and support services.
2. **Enhanced Orientation**: Include specific sessions or materials in orientation programs addressing the needs and support available for students with disabilities.

**Conclusion**

As secondary education continues to evolve in its approach to supporting students with disabilities, universities must adapt their policies and practices to ensure these students have equitable access to higher education. By embracing flexible documentation requirements, implementing universal design principles, and enhancing disability services, universities can provide a supportive and inclusive educational environment for all students. Collaboration between secondary and higher education institutions, continuous policy review, and stakeholder engagement will be crucial in navigating these changes effectively.

## Policy changes in second-level education in Ireland

Several policy changes introduced by the Department of Education over the past five years are likely to significantly impact the provision of evidence of disability by prospective and incoming students, as required for funding purposes.  These are set out in the following sections.

**Reasonable Accommodations at Certificate Examinations (RACE)**

The scheme of Reasonable Accommodations at the Certificate Examinations (RACE) facilitates post-primary students who would have difficulty in accessing the examination or communicating what they know to an examiner due to a physical, visual, hearing and/or learning difficulty. The scheme assists candidates with SEND to demonstrate their learning without compromising the integrity of the assessment. The focus of the scheme is on removing barriers to access, while retaining the need to assess the same underlying skills and competencies as are assessed for all other candidates, and to apply the same standards of achievement as apply to all other candidates.  The scheme provides accommodations for students with a variety of complex special educational needs including learning difficulties as well as permanent or temporary physical, visual, hearing, medical, sensory, emotional, behavioural or other conditions.

In 2017, the State Examinations Commission (SEC) made significant changes to the RACE scheme changing the emphasis on the application process from Leaving Certificate to Junior Certificate in that if accommodations are granted at Junior Cert level there is an assumed need for them to be retained for Leaving Cert, once the SEC are satisfied that the need is still present.  Where previously this evidence had to be provided by external professionals (e.g., a psychoeducational assessment by an Educational Psychologist for Specific Learning Difficulty), the new regulations permitted schools to use [school-based assessments](https://www.examinations.ie/schools/cs_view.php?q=23c5e7e2fe3a2712503dd9040040800987a46ab6) to apply for accommodations in State exams.  This removed the necessity for parents to purchase expensive assessments and diagnostic reports as part of the application process.

In practice, this means that many students entering third-level settings request registration with the Disability Service and access to the same Reasonable Accommodations provided for the Leaving Certificate, with only a statement of examination accommodations issued by the SEC.

**School Inclusion Model**

In 2018 the National Council for Special Education (NCSE) piloted the new [School Inclusion Model](https://ncse.ie/wp-content/uploads/2019/11/Progress-Report-Policy-Advice-on-Special-Schools-Classes-website-upload.pdf) based on the premise that students with additional needs required timely and relevant support from a range of professionals based on individual need rather than a disability diagnosis, this model being more equitable as it provides immediate and consistent access to supports.  Schools deploy supports based on the Continuum of Support Framework which is delivered by the school in collaboration with the National Educational Psychology Service (NEPS) who work with school staff to identify levels of individual need and appropriate interventions which are not based on formal diagnosis of SEND.  The Continuum of Support provides a framework for schools to enable them to identify and respond to student’s needs in a flexible way. This process is also supported through engagement with external professionals, as required by collecting information that will inform what level of support is required, as follows:

**Identification of Educational Needs through the Continuum of Support Process**

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| Whole-School and Classroom (Support for All)  | The Post-Primary Continuum of Support contains a range of ideas and resources to assist in identification, intervention and monitoring of outcomes. The subject teacher considers how to differentiate the learning programme effectively to accommodate the needs of all students in the class. Identification of those needing additional support can be informed by: * Intake screening
* Collection of information from primary schools, including Student Passport
* Teacher observation
* Teacher assessment
* Learning Environment Checklist
* Student Support Team involvement
* Standardised tests of literacy/numeracy
* Student consultation
* Parental consultation

Where students continue to present with significant difficulties, despite whole-school interventions (such as differentiated teaching, a mentoring programme or social skills group), School Support (for Some) is initiated.  |
| School Support (for Some)  | At this level a Support Plan is devised and informed by: * Teacher observation records
* Teacher-designed measures / assessments
* Parent/student interview
* Learning environment checklist
* Diagnostic assessments in literacy/numeracy
* Formal observation of behaviour including ABC charts, frequency measures
* Functional assessment as appropriate, including screening measures for social, emotional and behavioural difficulties

 Support at this level can take many forms, for example: team-teaching, small group or individualised tuition, peer mentoring, inclusion in social skills groups, behaviour reward and consequence systems.  A Support Plan operates for an agreed time and is subject to review.  |
| School Support Plus (for a Few)   | At this level, subject teacher(s), parents, and special education teachers, in collaboration with outside agencies, as required engage in a more detailed and systematic approach to information gathering and assessment. This involves using a broad range of formal and informal assessment and diagnostic tools, including teacher observation, student interview, measures of cognitive ability, and social, emotional, behavioural, and adaptive functioning, as appropriate. Data generated from this process are used to plan an appropriate intervention and serve as a baseline against which to map progress. A Support Plan at this level is likely to be more detailed, individualised, and to involve longer term planning and consultation.  |

The requirement for a formal, clinical diagnosis of specific disability is not stipulated.  This relieves parents of the burden of seeking costly, private assessments.

In practice, this means that many students entering third-level settings will request registration with the Disability Service and access to the same educational supports as those provided in post-primary school, without evidence of disability to support that request.

**Assessment of Educational Need**

The Assessment of Need (AON) is a statutory process under the Disability Act (2005) whereby the Health Service Executive (HSE) reports on the health needs, and more recently, the education needs of a child/young person. All children/young people born on or after 1st June 2002 are eligible to apply for an Assessment of Need (AON) under the Disability Act (2005).

Following a legal judgment in 2021, the Department of Education published guidelines for a new strategy in October 2022 – the Report of Education Needs for the purpose of Assessment of Need (Disability Act 2005).  Under the Disability Act (2005) Section 8 (3) if the HSE Assessment Officer forms the opinion that there may be a need for an education service to be provided to an applicant she/he will request the NCSE to nominate a person with the appropriate expertise to assist in carrying out the assessment of education needs. An information note has been issued to inform schools of these recent changes and a template document has been devised for schools to complete a ‘[Report of Education Needs for the purpose of Assessment of Need’](https://www.gov.ie/en/publication/91c1c-report-of-education-needs-for-the-purpose-of-assessment-of-need-disability-act-2005/). A ‘Guidance Note for Schools’ has also been developed for schools to aid in the process of completing this report.

In practice, this means that many students entering third-level settings will request registration with the Disability Service and access to the same educational supports as those established in the Report of Education Needs, potentially without a full AON of need for disability to support that request.

**Disability Access Route to Education**

The Disability Access Route to Education (DARE) is a third-level alternative admissions scheme for school leavers under the age of 23 as of 1st January in any year whose disabilities have had a negative impact on their second-level education. DARE offers reduced points places to school leavers who, because of having a disability, have experienced additional educational challenges in second-level education.  To be eligible for DARE students must meet both the DARE Educational Impact criteria and DARE Evidence of Disability criteria.

[Evidence of disability documentation](https://accesscollege.ie/wp-content/uploads/2023/01/DARE-2023-Handbook.pdf) is used by DARE to establish eligibility criteria and is used by colleges and universities to determine the kinds of support students may need.   Some applicants may submit a report which they already have, other applicants may need to have the Evidence of Disability Form completed by the appropriate professional, in addition, some evidence may be required to have been completed within a particular timeframe.  For students with an existing diagnosis but who have difficulty accessing the appropriate professional for confirmation or an updated report, a General Practitioner can complete the Section C Evidence of Disability form.   In recognition of the absence of formal psychological assessment as a function of RACE and the School Inclusion Model, the DARE scheme has made amendments to the acceptable evidence for Specific Learning Difficulty (Dyslexia).  Where no psychologist report is available, the school must complete Section D of the Education Impact Statement indicating levels of support and providing evidence of assessed literacy scores.

In practice, this means that many students entering third-level settings will request registration with the Disability Service and access to the educational supports based on the DARE Evidence of Impact Statement.

**HEA Fund for Students with Disabilities**

The purpose of the Fund for Students with Disabilities (FSD) administered by the Higher Education Authority (HEA) is to assist higher education institutions in ensuring students with disabilities have the necessary assistance and equipment to enable them to access, fully participate in, and successfully complete their chosen course of study. The FSD is one of the main funding sources supporting participation by students with disabilities in approved higher education courses in Ireland. It also supports students from Ireland to study on approved courses in other EU (European Union) countries and in the UK (United Kingdom), including Northern Ireland.  Eligible students on an approved course can receive assistance from post-leaving certificate to doctoral level during any year of study.

To be eligible for support under the FSD, a student on an approved course must have a verifiable disability.  Currently, guidelines for this evidence require:

1. a report that meets the criteria as set out in the [FSD 2023 requirements](https://hea.ie/assets/uploads/2018/06/FSD-Guidelines_2022-23-Final.pdf), or

2. the CAO/Disability Access Route to Education (DARE) evidence of disability form that meets the same criteria where the student has completed this step as part of a CAO application. The CAO/DARE evidence of disability form is not considered acceptable as evidence of disability in the case of specific learning difficulties (dyslexia and dyscalculia) and students with DCD-dyspraxia/dysgraphia.

Where the CAO/DARE evidence of disability form is furnished, the requirements as stated on the form must be met (including that it be accompanied by the qualified health professional’s stamp, business card or headed paper; or where the information from the qualified health professional is provided by a GP, it be accompanied by the GP’s stamp, business card or headed paper).

Providers of reports must be appropriately qualified professionals and members of

professional/regulatory bodies. Reports should be signed and on headed paper.

A GP’s own diagnosis of a disability/condition is not acceptable as evidence of disability for the purposes of the FSD.

In practice, this means that many students entering third-level settings will request registration with the Disability Service and access to reasonable accommodations and supports but may not have evidence of disability that meet the criteria for funding.