

# **RACE review Consultation submission**

## **David Redmond**

As someone with a visual impairment, I know firsthand the importance of reasonable accommodations for state examinations.

I worked with a reader and scribe for all state examinations, as well as using modified non visual papers for some subjects.

While I would be mostly positive regarding my own personal experience, I have become aware of a concerning decline in recent years that absolutely needs to be reversed.

I work independently in full time employment, with the support of assistive technology such as a screen reader. I have heard some argue in recent years that provision of certain reasonable accommodations for state examinations is not helping students as it is not a reflection of how things work in the “real world”. This argument is made a lot in relation to scribes with people arguing that technology should be encouraged as an alternative.

I strongly believe that this is a dangerous position to take, unfairly disadvantages students, and increases pressure and health risks.

Ensuring that a student has a reasonable level of comfort is just as important as ensuring a reasonable level of

accessibility. Examinations are already extremely stressful by nature and can exacerbate certain medical conditions. If we want to provide fair exams which should be the aim, then we need to accommodate students in the way that feels right to them. We can provide guidance, but candidate autonomy must always be prioritised within the confines of providing a fair assessment.

Reasonable accommodations for state examinations should in my view be set around a few core principles.

1. Examinations should be designed with accessibility and inclusion in mind for all students.
2. Certain reasonable accommodations should be built directly into examination day and be available to all students without prior application.
3. Variety and flexibility should be provided in the range of reasonable accommodations that are available, and where an application for those reasonable accommodations is necessary, a student should be able to make that application without the support of any school, visiting teacher, service provider, medical professional, or any other organisation.
4. Decisions to refuse a reasonable accommodation request should only happen in exceptional circumstances, and should never happen without the involvement of someone with a disability. In other words, someone without a disability irrespective of qualification should not have sole authority on refusing a reasonable accommodations request without consulting with a disabled person.
5. Reasonable accommodations should be well resourced, and should be normalised. They should not be seen as

something special. This includes readers, scribes and alternative formats.

## **Universal access**

All state examination papers should follow best practice for document accessibility. This should not be a reasonable accommodation.

As well as this, accessibility should be built into the examinations environment by default

1. Clear print guidelines from Vision Ireland, the national association of deaf people (NAD), and the national adult literacy agency (NALA) should be followed.
2. A WCAG AAA standard of colour contrast should be met for all visual examination material.
3. Time allocation for exams should far exceed the expected time to complete a paper. This should be a universal principle across all exams, with additional extra time on top of this available to students who need it.
4. Spelling should not be considered during the marking of papers unless absolutely necessary.
5. Where possible exam centres should be on a ground floor, and should be easy to access.
6. Exam centres should have and follow safe air procedures, and have continuous CO<sub>2</sub> monitoring.
7. All examiners and adjudicators should undergo mandatory disability awareness training. It is highly likely that in every state examinations cohort there is going to be a number of people with some disability.

## **Universal reasonable accommodations (no prior application)**

Students should be able to request certain reasonable accommodations immediately before starting or during an exam. Schools should be provided with The appropriate materials to accommodate these requests.

1. Schools should have a supply of large print papers by default that can be requested by any student.
2. Schools should have exams printed on appropriate coloured paper that can be requested by any student.
3. Non-distracting sensory supports should be available to any student who requests them.
4. Water and tissues should be available to any student who needs them during the exam process.

## **Reasonable accommodations requiring applications**

A student should have the ability to apply for all of the below reasonable accommodations, without the support of any third-party agency or medical professional. A huge number of people need these supports but may not have the ability to prove it. This is a separate issue, but we need to account for it nonetheless.

This should be as straightforward as an email or phone request, and an informational document explaining reasonable accommodations should be provided to all candidates.

## **List of standard accommodations**

1. Scribe
2. Reader
3. Special Centre
4. Extra time (30 mins per hour if needed)
5. Rest breaks
6. Wordprocessed responses
7. Audio or video recorded responses
8. Digital exam papers
9. Modified exam papers
10. Braille exam papers
11. Use of assistive technology tools such as magnifiers or OCR solutions.
12. A tailored reasonable accommodation based on a specific disability. (This triggers mandatory review by another disabled person.) In all cases, the aim should be to accommodate the candidate and find a comfortable solution.

A decision on a reasonable accommodation must be given to a student in a timely manner, and cannot later be revoked.

If a student has reasonable accommodations for junior cycle. These can automatically be transferred to leaving certificate examinations or other state examinations without reapplying.

## **Specific guidelines for accommodations**

### **Scribes/Readers**

Scribes and readers need to have a few core skills:

1. The ability to write at a natural speaking pace. (I've personally found stenographers to be the best at this in the past.)
2. The ability to accurately represent a dictation.
3. Fluency in the language of the examination, as well as the candidates primary language.
4. Ability to read examination material at a comfortable pace, as well as the ability to read back the candidate dictation accurately.
5. Where necessary, the ability to convey mathematical equations accurately as described by the candidate. This may also require directed use of a calculator as a proxy for the candidate, and reading of responses.

A candidate should know who the scribe will be well in advance of exam day, and be able to do at least one rhythm finding exam exercise in advance.

### **Digital exams**

Digital exams should be required to meet at least WCAG 2.2 AA levels of accessibility, with AAA levels of access as the aim.

1. Systems should be tested in advance, with this including access audits.

2. System availability should be monitored in real time during all examinations
3. In the event of a technical failure, this should be communicated no more than 5 minutes after an exam starts, or no more than five minutes following the issue arising if during an exam.
4. Technology support with accessibility experience should be on standby.

## **Use of assistive technology**

Technology is always evolving. Candidates need to be able to use technology that works for them, with the only exceptions being use of externally connected AI apps or internet connected tools.

It's worth considering if a custom exam RAG model with no external knowledge could be used to improve access in a controlled exam environment, but this is a bigger conversation.

1. Screen readers and magnifiers should be devices or software that the user is familiar with.
2. Backup devices should be on standby where possible.
3. Basic supplies such as AA batteries should be available as required.

Ultimately, you're trying to limit risk.

## **After the exams**

1. Modified papers should be made available online at the same time as standard papers.
2. A report should be published online each year evaluating the SEC's implementation of reasonable accommodations.
3. Feedback should be gathered from students each year.
4. Continuous evaluation of available assistive technologies and accessibility best practice should be conducted regularly. This should happen in consultation with disabled people, as well as organisations like Vision Ireland, Feach, and the NCSE.
5. All SEC staff should undergo regular disability awareness training.

## **Conclusion**

I could go on, but I think my core principles have been conveyed. We need to get much better at providing reasonable accommodations, and disabled people need to be guiding that.

The question should never be if a disabled person can complete the leaving cert? We should be asking how we can make these students comfortable to a point where they can complete their exam without significantly more challenges compared to their counterparts.

This is about more than exams, it's about candidate dignity.

We need to do better, and doing better isn't as hard as it seems.