



MEDICAL COUNCIL OF CANADA LE CONSEIL MÉDICAL DU CANADA

TESTING ACCOMMODATIONS: ENVIRONMENTAL SCAN REPORT

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May 2018

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BACKGROUND

Many professional organizations require some form of demonstration of knowledge or skills via standardized testing for the purpose of licensure and certification. However, the conditions of standardized testing may be cumbersome to individuals with a functional impairment, let it be physical, mental, learning disability or some form or mix of these three. In accordance with many laws such as Ontario's Human Rights Code or the Americans with Disabilities Act (ADA), testing organizations must make changes to the examination conditions to allow individuals with disabilities to demonstrate their true knowledge and skills. These changes are referred to as testing accommodations. Lovett and Lewandowski define it as "an alteration to the test administration procedure that does not change the test content"¹.

The Medical Council of Canada (MCC) strives for fair and reliable assessment of all physicians who plan to practise medicine in Canada. The MCC grants testing accommodations on the written examinations and the objective structured clinical examinations (OSCE). In recent years, the number of requests for testing accommodations has been growing.

The MCC is one of many testing organizations among health-care and other professionals. Since providing special testing accommodations is law, most testing organizations grant testing accommodations to those who request them provided their request is supported with proper documentation. However, as expressed by Aaron D. Johnson², who attempted to study testing accommodations for dental students with disabilities, there seems to be lack of standardized data on testing accommodations among the testing organizations. The MCC was interested in exploring the opportunity to understand the processes and policies employed by other organizations. In fact, a preliminary scan of a dozen or so testing organizations' websites indicates there is no clear definition of functional limitations and the associated testing accommodations being granted.

In order to further examine our own processes and policies around testing accommodations, we conducted an environmental scan of similar testing organizations to learn about the phenomenon of testing accommodations and their associated processes and procedures.

The scan aimed to answer the following questions:

- Is the frequency of requests for other organizations similar to ours?
- Are the requests for testing accommodations similar?
- Are the processes around granting those requests comparable?

METHODS

An environmental scan of other testing organizations was conducted through an electronic survey (Survey Monkey Enterprise, cloud-based product). The survey was distributed on April 4, 2018 and data was gathered until May 7, 2018. Two survey reminders were sent. The invitation to participate in the survey was sent to twelve organizations. To enrich our data, we reached beyond Canada and contacted the equivalent of the MCC in the US and Australia.

The following organizations were invited to participate in the survey:

- Australian Medical Council (AMC)
- Canadian Alliance of Physiotherapy Regulators (CAPR)
- College of Family Physicians of Canada (CFPC)
- College of Nurses of Ontario (CNO)
- Industry Training Authority of British Columbia (ITA BC)
- Law Society of Upper Canada (LSUC)/Law Society of Ontario (LSO)
- National Board of Medical Examiners (NBME)
- Council of the Canadian Association of Physician Assistants (PACCC)
- Professional Engineers Ontario (PEO)
- Royal College of Dentists of Canada (RCDC)
- Royal College of Physicians and Surgeons of Canada (RCPSC)
- Ontario College of Pharmacists (OCP)

We also added the MCC's data to the respondent data bringing the number of organizations to thirteen.

The survey was designed at the MCC and reviewed and approved by the MCC's Research Advisory Committee (RAC) and Research and Development (R&D) Committee in January 2018. The survey's first question asked for the participant's agreement to participate in the survey, the following nine questions were on testing accommodations (policies and processes) and the final six questions were about the organizations themselves. Given the small number of participants, only descriptive analyses were performed.

RESULTS

I. Respondent Characteristics

Nine of the thirteen invitees (69%) completed the survey. Eight respondents answered the question about the level of credentialing their organization assesses and all levels are represented (provincial, national and international [under "other"]).

The size of the responding organizations also represents a wide range of candidate volumes, ranging from small (testing under 200 candidates per year) to large (testing over 100,000 per year).

All respondents offer multiple assessments (more than one per year). Furthermore, all responding organizations offer a variety of types of assessments (more than one type), from multiple-choice question (MCQ) examinations to performance-type examinations.

Similarly, there is a wide range of representation with regards to the timing of the examinations. Some respondents offer continuous testing whereas others offer periodic testing windows.

With regards to the testing location, three of the respondents indicated they use their own testing centers, whereas six use centers owned by external vendors (please note, the same respondent could be using their center for one form of assessment and an external vendor for another form of assessment). The MCC uses both rented space and space provided by external vendors. One other respondent also indicated that space is rented as needed.

II. Results to Questions on Testing Accommodations

As mentioned earlier, providing testing accommodations is law and most testing organizations grant testing accommodations to those who request them provided their request is supported by proper documentation. Through the survey, we have learned the supporting documentation required is different for the differing organizations. As noted in Table 1, all organizations require a note from a physician and most of the organizations require results of some form of psycho-educational assessment. However, only three of the nine organizations require documentation indicating a history of accommodations previously granted.

Table 1: Question 2 - Required documentation for Testing Accommodations Requests

Question 2: Which documents must candidates submit to be granted testing accommodations? (Please select all relevant options.)		
	Frequency	%
Testing accommodations request form	7	77.8
Documentation from their health-care provider	9	100
Testing results (e.g., psycho-educational assessment result)	8	88.9
History of accommodations previously granted	3	33.3
Personal statement	6	66.7
Other (please specify)	3	33.3

Two of the three “other” options were specified and they are listed below. It appears they confirmed the testing organization’s right to verify the information submitted by the candidate.

- “Authorization of the candidate to contact any of the experts who have provided documentation on his or her behalf”
- “Letters from leader of religious congregation if the testing accommodations are granted on the grounds of a religious restriction (i.e., exam date)”

The next series of questions asked about the candidates’ consent to share the information submitted.

Table 2: Question 3 - Required Candidate Consent Form

Question 3: Do you obtain the candidates’ consent to share the information submitted with others?		
	Frequency	%
No, the information is not shared with any other organization	6	66.7
Yes, to determine whether the candidate suffers from any physical or mental health-related condition or disorder that could affect their ability to practice in the profession they are testing for	1	11.1
Yes, it is shared with the regulators	0	0
Yes, it shared with...	2	22.2

Although the majority of organizations indicated they do not share the information with other organizations (6/9), one of the respondents indicated they do share if the candidate suffers from any physical or mental health-related condition or disorder that could affect their ability to practise in the profession they are testing for. Two organizations indicated they share the information with others including either external exam administrators or the vendors who administer their exams.

The following question asked about the candidate’s consent signature.

Table 3: Question 4 - Candidates' Consent to Accept Testing Accommodations

Question 4: Are candidates required to sign a document confirming acceptance of the granted testing accommodations prior to challenging the exam?		
	Frequency	%
Yes	5	55.6
No	3	33.3
Only under certain conditions	1	11.1

As Table 3 indicates, the requirement of signing a document confirming the acceptance of granted testing accommodations is somewhat split. A closer look at the data does not indicate this would be dictated by the size of the candidate cohort. However, all three organizations that do not require a signature confirming the acceptance of a testing accommodations also indicated that learning-related functional limitations (such as dyslexia, attention deficit hyperactivity disorder [ADHD]) is the most common reason for requesting accommodations.

The following question inquired about the percentage of candidates who require testing accommodations.

Table 4: Question 5 - Percentage of Candidates Requesting Testing Accommodations

Question 5: What percentage of candidates require testing accommodations for your examination?		
	Frequency	%
<1%	1	11.1
1-5%	7	77.8
>5%	1	11.1

As Table 4 indicates, for the majority of respondents, 1 – 5% of their candidates require testing accommodations. Interestingly, the two organizations that indicated they grant testing accommodations to less than 1% or more than 5% of their candidates are the two largest testing organizations that participated in the survey.

Based on the MCC’s analyses of testing accommodation data, we know there is a wide variety of reasons to request testing accommodations. We have attempted to group them into the most common themes and during the survey, respondents were asked to choose only the most common reason. Though most of the MCC’s testing accommodation requests are based on physical functional limitations, the second most common request for testing accommodations is due to learning-related functional limitations.

Table 5: Question 6 - Most Common Reasons Testing Accommodations are Requested

Question 6: What is the most common reason for requesting testing accommodations?		
	Frequency	%
Permanent physical functional limitations (visual loss, hearing loss, diabetes)	1	11.1
Temporary physical functional limitations (breastfeeding, pregnancy, fracture)	1	11.1
Learning-related functional limitation (dyslexia, ADHD)	5	55.6
Mental health-related functional limitation (anxiety, obsessive compulsive disorder [OCD], depression)	1	11.1
Combination of physical and learning-related functional limitations	0	0
Combination of physical and mental health-related functional limitations	0	0
Combination of learning and mental health-related functional limitations	0	0
Combination of all three functional limitations	1	11.1
Other (please specify)	0	0

The most common reason for testing accommodations is related to learning-related functional limitations. For some testing agencies, physical functional limitations (permanent or temporary) and mental health-related functional limitations were the most common source of requests for testing accommodations.

We also asked about the most common testing accommodations granted.

Table 6: Question 7 - Most Common Testing Accommodations Granted

Question 7: What is the most common testing accommodation granted?		
	Frequency	%
Extra time – 50% and under	3	33.3
Extra time – more than 50%	0	0
Private room	0	0
Extended/additional break	0	0
Assistive equipment (left-handed equipment, wheelchair accommodations, hearing interpreter, latex-free environment)	1	11.1
Comfort accommodations (allowing special food or medication)	1	11.1
Combination of extra time and private room	3	33.3
Combination of private room and extended additional break	0	0
Any other combination	1	11.1

As the data in Table 6 indicates, extra time or extra time with a private room are the most common accommodations granted. What we noticed is that learning-related functional limitation usually grants extra time or extra time with private room to accommodate the students. Temporary physical functional limitations (such as breastfeeding, pregnancy, fracture) are accommodated through assistive equipment; mental health-related functional limitation (anxiety, OCD, depression) are accommodated via a combination of accommodations.

A review of the various organizations' websites suggested there is no consistent or standardized approach to testing accommodations. Most organizations approach testing accommodation requests on a case-by-case basis as indicated in Table 7.

Table 7: Question 8 - Set Policy on Granting Testing Accommodations

Question 8: Does your organization have a set policy or clear guidelines specifying what testing accommodations should be granted?		
	Frequency	%
Yes	1	11.1
Yes, but unique cases are considered individually	1	11.1
No, all cases are considered on a case-by-case basis	7	77.8

Question 9 verified the data presented in Question 8 by asking the respondents to confirm the percentage of requests that are considered on a case-by-case basis. It confirmed the majority of the organizations process 100% of the requests-on-case by case basis. (The information provided in question 9 is the same as the information presented in question 8.)

Table 8: Question 10 - Unfair Advantage and Testing Accommodations

Question 10: Have you ever had complaints from students taking the test under standard conditions who feel the testing accommodations grant an unfair advantage to those who receive them?		
	Frequency	%
Yes	2	22.2
No	7	77.8

As Table 8 indicates, two of the nine respondents signaled that some of their examinees questions the unfair advantage of testing accommodations.

DISCUSSION

Although the small number of participants allows for limited analyses, the survey did provide insights into the scale of the testing accommodation phenomenon among the different testing organizations.

Our environmental scan indicates that testing accommodations are granted by all participating organizations. Learning-related functional limitations are the most common reason for granting testing accommodations and extra testing time is the most frequent accommodation granted. The prevalence of learning-related functional limitations as the most common reason was of no surprise as similar information was found in our literature review.³ We also found similar results in the MCC's testing accommodation data. After

comfort accommodations, we found that extra time is the most common accommodation granted (40%).

The range of supporting documents required from candidates who request testing accommodations indicates that different organizations use different systems to support the granting of testing accommodations. Furthermore, it seems there are different approaches as to what to do with the information gathered, and though most of the organizations do not share this information with anybody else, some do.

The fact that seven out of the nine survey respondents have a case-by-case approach to granting testing accommodations suggests that no set policy is used in the process of approving the accommodations. This is not surprising as “no consistent definition of what constitutes a disability exists in Canadian jurisprudence”.⁴ Things become even more complicated by the fact that existing definitions vary from one province to another. As Roberts claims in the *Canadian Journal of School Psychology*⁵, there is presently no one definition of “learning disability” that could be used consistently by clinicians or implemented consistently by testing organizations. “The presence of a diagnosable condition does not necessarily require accommodations or produce functional limitation in all situations”, and yet, it seems that in order to prevent any legal action, testing organizations support the majority of requests for testing accommodations they receive.

The lack of a standardized approach to treating testing accommodations is further illustrated by the fact that some organizations require candidates to sign a document confirming their acceptance of the granted testing accommodations prior to challenging the exam, whereas others do not.

Testing accommodations require significant organizational efforts in ensuring the candidate is able to demonstrate their abilities versus maintaining the integrity of the examination’s purpose and the validity of scores. Ontario’s Human Rights Code stipulates the effort of making such changes has to be substantial to the point of “undue hardship” for the organization. The Ontario code identifies three factors in determining whether a requested accommodation would cause undue hardship: cost, availability of outside sources of funding, and health/safety requirements. Negative impacts on other candidates and staff may also be considered an undue hardship.⁶

As mentioned earlier, the number of requests for testing accommodations at the MCC keeps increasing. A standardized approach to testing accommodations from one organization to another (especially with sister organizations) would make the process easier for both candidates and the testing organizations. Candidates would know what the expectations and requirements are and the testing organizations would benefit as they could make the process of granting testing accommodations more objective and transparent. It would also help the testing organizations from an exam logistics and budget point of view.

We found the data from Question 10 to be quite interesting. The fact that there are voices questioning the fairness of testing accommodations would indicate that a more standardized and transparent process for granting accommodations is needed. Approaching the requests on case-by-case basis may create a perception of unfairness as the same impairment may result in different accommodations depending on the testing organization.

The survey confirmed that all testing organizations who participated deal with the testing accommodations phenomenon and that varied approaches are employed in processing the requests.

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