Documentation Requirements for Learning Disabilities

Armstrong State University's Office of Disability Services is committed to working with students with disabilities to assess their needs and to assist with academic accommodations that may be necessary and appropriate due to their disability.

Services are available to students who:
1. Self identify to the Office of Disability Services
2. Participate in an intake interview with the Director or Coordinator of Disability Services to determine needs and accommodations
3. Provide appropriate documentation of the disability (see below) that supports the accommodations being requested.

Definition of Disability
An individual must demonstrate that his/her condition meets the definition of a disability under the Rehabilitation Act (1973) and/or the Americans with Disabilities Act (ADA, 1990, and its Amendment, 2008). The ADA defines a disability as a physical or mental impairment that substantially limits one or more major life activities when compared to most people in the general population.

Whether a condition is substantially limiting to support an accommodation request is a decision made by qualified professionals based upon multiple sources of information using an individualized assessment. The condition, manner, or duration of an individual’s performance of a major life activity may be useful in determining whether impairment results in a substantial limitation.

Notably, a clinical diagnosis is not synonymous with a disability. As described in the most recent version of the Diagnostic and Statistical Manual of Mental Disorders, diagnosis of a clinical disorder is insufficient for establishing a disability because “diagnosis does not imply a specific level of impairment or disability” and “impairments, abilities, and disabilities vary widely within each diagnostic category” (APA, 2013, p. 25). Greater information regarding functional limitations in major life activities is required to substantiate a disabling condition relative to most people in the general population.

Generally, the availability of mitigating measures to lessen the effects of a person’s disability will not change the analysis of whether the person has a qualifying disability.

Documentation Considered
The general and specific documentation guidelines detailed below are written for disability service providers, evaluators, and others who are responsible for making determinations of eligibility for academic accommodations in the University System of Georgia (USG) colleges and
universities. The guidelines are intended to influence and direct the review of documentation by disability service providers, and encourage consistency of disability service delivery across the USG. During documentation reviews, all eligibility and accommodation decisions will be made on a case-by-case basis and will be informed by an interactive process. Notably, the criteria of the general and specific guidelines need not be met via a single stand-alone psychological, psychoeducational, or neuropsychological report. Institutions will consider all documentation, data, and information provided as potential evidence of a disability and need for accommodation. Considerable weight will be ascribed to documentation of previous diagnoses, disability determinations, and modifications and accommodations received (e.g., Individualized Education Plans [IEPs], Section 504 Plans, confirmation of accommodation eligibility on the SAT). Although considerable weight will be given to the information in various types of documentation, evidence of current substantial limitation should be indicated in the documentation so that appropriate accommodations can be provided. No single criterion in the specific documentation guidelines, in its presence or absence, will rule-in or rule-out eligibility.

Professionals seeking to provide a comprehensive evaluation that will document a disability and verify need for accommodations are encouraged to adhere to the USG guidelines.

**General Documentation Guidelines**

All institutions are required to have written policies and procedures for review of documentation submitted by students with disabilities. Academic accommodations are provided by the disabilities services office or a designated office at an individual college or university. Decisions for system-level accommodations for cognitive/linguistic disabilities (i.e., learning disabilities, ADHD, autism spectrum disorders, acquired brain injuries, communication disorders, and psychological disorders) are made by the associated Regents’ Center for Learning Disorders. All disability eligibility and accommodation decisions are made on a case-by-case basis.

In order to establish disability status and eligibility for disability services, institutions of the University System of Georgia require documentation from a qualified evaluator that:

- attests to the presence of a disabling condition as defined by the ADA and
- demonstrates substantial limitations impacting performance in the academic environment when compared to most people in the general population.

Documentation is used to determine eligibility for disability services, as well as to inform accommodation decision-making.

General documentation guidelines pertain to all disabilities. The following are provided to guide evaluators, students, and family members as they seek to document a disability under the ADA.

**Appropriate evaluators**

- Evaluators must be licensed qualified professionals whose training and credentials are consistent with expertise in the disability for which they provide documentation and/or eligibility classification under the IDEA/Section 504.
- Evaluators may not be friends or family members of the student.
Documentation of a physical and/or mental impairment

- A diagnostic statement based on the most current Diagnostic and Statistical Manual of Mental Disorders (DSM) and/or International Classification of Diseases (ICD) should be included, unless the evaluator is unable to do so due to school system regulations.
- Evaluators should demonstrate how the assessment results meet diagnostic criteria.
- The progression of the condition should be detailed if its impact on the student’s functioning is expected to change over time.
- Because diagnostic methodologies vary by disorder, further guidance for meeting this requirement can be found in the specific guidelines.

Documentation of a current substantial limitation in a major life activity

- The substantial limitation in a major life activity should be described.
- Quantitative and qualitative information should be used to demonstrate that the difficulties are substantially limiting when compared to most people in the general population.
- Evidence that the difficulties are substantially limiting to the student in the academic environment should be presented.
- Because substantial limitations may vary by disorder, further guidance for meeting this requirement can be found in the specific guidelines.
- In some cases, documentation of a current substantial limitation in the educational domain may be difficult to produce due to use of effective accommodations and interventions. In such cases, the documentation of the substantial limitation should include a description of the substantially limited abilities and skills, the accommodations and interventions implemented to address those limitations, the degree of the effectiveness of each, and justification for continued need.

Accommodation recommendations

- Any accommodation recommendations made must be supported by a rationale that explains the necessity based on the student’s measured impairments and current substantial limitations.
- Documentation of accommodations approved in the past is encouraged but does not guarantee approval at the postsecondary level.

Recency

In order to determine eligibility for disability services and provide the most appropriate accommodations and services, documentation should provide an adequate representation of the student’s current functional abilities. Conditions served vary by developmental course and functional impact. As a result, guidance regarding recency requirements is provided in the specific documentation guidelines for each disorder. However, professional judgment will be used in determining the acceptability of any documentation provided.

Provisional accommodations

For students with a documented history of disability whose documentation fails to meet USG guidelines, institutions are encouraged to provide accommodations provisionally for a period of
time (usually one semester) that would be reasonably sufficient for the student to gather the necessary information.

**Learning Disabilities**

Learning disabilities is a general term that refers to a heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning, or mathematical skills. These disorders are intrinsic to the individual, presumed to be due to central nervous system dysfunction, and may occur across the life span. Problems in self-regulatory behaviors, social perception, and social interaction may exist with learning disabilities but do not, by themselves, constitute a learning disability. Although learning disabilities may occur concomitantly with other disabilities (e.g., sensory impairment, intellectual disability, serious emotional disturbance), or with extrinsic influences (such as cultural differences, insufficient or inappropriate instruction), they are not the result of those conditions or influences. (From the National Joint Committee on Learning Disabilities, Learning Disabilities: Issues on Definition)

Specific documentation guidelines for Learning Disabilities include the following:

- General documentation guidelines listed above.
- Documentation should reflect data collected within the past three years at the time of request for services or after the age of 18 so long as the documentation continues to represent current functioning.
- Clear and specific identification of a learning disability must be stated. For example, the terms “Learning styles” or “Learning differences” are not synonymous with a learning disability.
- Documentation of a developmental and educational history consistent with a learning disability.
- Documentation of learning disabilities should include standardized measures of academic achievement, cognitive/linguistic processing, and/or intellectual functioning that have normative data representing the general population. All standardized measures must be represented by standard scores and percentile ranks based on published age-based norms.
- Documentation of one or more cognitive/linguistic processing deficits that is associated in a meaningful way with the identified area(s) of academic limitation. Cognitive/linguistic processes commonly associated with academic achievement (selection dependent upon case) include the following:
  - Fluency/Automaticity
  - Executive functioning
  - Memory/Learning
  - Oral Language
  - Phonological Processing
  - Orthographic Processing
  - Visual-Motor
  - Visual-Perceptual/Visual-Spatial
• Documentation suggesting that the academic limitations are unexpected is necessary. As a result, evidence that substantially limited areas of achievement fall significantly below higher-level cognitive and/or linguistic abilities (e.g., broad intellectual functioning, reasoning, vocabulary, crystallized knowledge) must be included.

• Objective (quantitative and qualitative) evidence that symptoms are associated with significant functional impairment in the academic setting. In the case of Learning Disabilities, documentation must include evidence of substantial limitation(s) in one or more of the following areas of academic achievement:
  ○ Reading (decoding, fluency, and/or comprehension)
  ○ Mathematics (calculations, math fluency, and/or applied reasoning)
  ○ Written Language (spelling, fluency, and/or written expression)

• Academic impairments, processing deficits, and evidence of intact functioning in other domains (e.g., higher-level cognitive functioning), should be evident on multiple measures.

• Documentation that alternative explanations for the academic and cognitive/linguistic limitation(s) have been considered and ruled out (e.g., low cognitive ability, other mental or neurological disorders, lack of adequate education, visual or auditory dysfunction, emotional factors such as anxiety or depression, cultural/language differences, poor motivation, symptom exaggeration).

For additional information, contact the Office of Disability Services by phone at (912) 344-2572 or by email at disability.services@armstrong.edu. Our fax number is (912) 344-3068.