

Special Issue: De-implementation in School Psychology

De-Implementing Inappropriate Accommodations Practices

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Abstract

Educational accommodations, which alter the manner in which instruction or assessments are administered, are often an appropriate part of a student's academic program. However, accommodations are frequently overused and have significant limitations. De-implementing inappropriate accommodations is a complex task, but one made easier through a clear understanding of the factors that cause and maintain those accommodations practices. In the present paper, we use the logic of functional behavioral assessment to better understand why evaluators and school staff recommend and provide inappropriate accommodations. We identify problematic background beliefs, specific antecedents, and reinforcing consequences for inappropriate accommodations, before describing several effective strategies for de-implementing those accommodations.

Keywords

de-implementation, accommodations, modifications, school consultation

A gap between research and practice has often been noted by school psychology scholars (e.g., Riley-Tillman et al., 2005). This has led to the use of implementation science, which focuses on putting appropriate, research-based techniques into practice in real-world settings. Implementation science is a helpful framework, but it has generally addressed the problem of getting school staff to engage in good practices (e.g., Sanetti

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& Luh, 2019), while neglecting the complementary problem of how to end the use of bad practices. *De-implementation* is the relevant solution to the latter problem.

In the present article, we discuss the de-implementation of inappropriate accommodations practices in educational settings. We begin by describing educational accommodations and discussing their advantages and disadvantages. We then cover a general model for school-based consultation that is well-suited to de-implementation efforts. Finally, we use the logic of functional behavioral assessment to help understand why inappropriate accommodations practices persist, and we describe implications for de-implementing those practices.

Educational Accommodations: Use and Misuse

Educational accommodations involve changes to the manner in which instruction or assessment takes place, while maintaining the same content (Lovett & Lewandowski, 2015). Accommodations include changes to presentation format (e.g., reading test items aloud to a student), response format (e.g., allowing a student to use a laptop to type rather than handwrite class notes), setting (e.g., preferential seating near the teacher), and timing (e.g., lengthening time allotments for exams). Effective accommodations allow students to better access (i.e., participate in) educational programming; this is often appropriate and, in fact, necessary. A student with a visual impairment may have little chance of understanding instruction presented in the typical manner, and a student with a reading disability may have similarly little chance of demonstrating their knowledge on a science test without having the items read to them. Despite these helpful features, accommodations do not directly increase students' skill levels. In contrast, effective *interventions* do increase skills. Therefore, as a general rule, interventions are to be preferred to accommodations, when both are potential responses to a student's disability-related deficits.

Accommodations have two additional limitations as well. First, they sometimes inadvertently reduce standards for students, taking away a natural incentive for skill development. For instance, if a student in fifth grade is provided a laptop due to having slow handwriting, the student has no incentive (or even much opportunity) for improving handwriting fluency. Similarly, if a student in ninth grade is provided class notes, that student never needs to learn how to take notes, and has little incentive to pay attention in class more generally (see e.g., Harrison et al., 2020). A second limitation of accommodations is that they can provide an unfair advantage—that is, a performance boost that is not tied to a disability-related need. A clear case of this is the use of memory aids, where students are actually permitted access to additional information ("cheat sheets") to use during an exam, to help cue memory. Most students, with or without disabilities, would benefit from such aids. Because accommodations can impede skill development and provide unfair advantages, they should only be used when (a) a student has clear disability-related deficits, (b) effective interventions are unavailable or insufficient, and (c) the accommodation does not compromise the integrity of the instruction or assessment.

For many high-incidence disabilities, where effective interventions have been developed (see e.g., Burns et al., 2017), the need for accommodations might seem to be low. However, accommodations are in fact very popular. For instance, Murray et al. (2014) found that of 170 high school students with ADHD who had a formal support plan, 87.9% received extended time on tests and a substantial minority received more intensive accommodations such as modified grading standards and slower-paced instruction. Far fewer students received interventions. Similarly, Hott et al. (2020) reviewed 89 IEPs of high school students with learning disabilities in mathematics, finding that the vast majority received accommodations (an average of five per student!) but most IEPs did not list any specialized instructional services or interventions.

Students with high-incidence disabilities such as learning disabilities and ADHD often receive instruction and complete tests under altered conditions that are mandated by formal plans. This very high rate of accommodation is unlikely to reflect genuine student needs and/or an unavailability of effective interventions. A wide variety of research suggests that accommodations are provided excessively and indiscriminately. First, as mentioned earlier, effective interventions are available for many of the functional impairments associated with common disability conditions. This does not mean that interventions will completely eliminate the impairments associated with the disability, but evidence-based interventions are often not even attempted or delivered with fidelity (King-Sears et al., 2018). Second, teachers have been found to overrecommend accommodations, in comparison with standardized procedures for determining accommodation needs (Fuchs et al., 2000). Third, qualitative research with school-based teams suggests that team members often do not understand the key factors that determine testing accommodation needs, and do not relate accommodation recommendations to validity or access in assessment (Crawford & Ketterlin-Geller, 2013; Rickey, 2005). Specifically, team members often provide accommodations due to affective concerns (anxiety, motivation, and self-esteem) rather than evidence of actual deficits in the skills needed to access tests.

In sum, although educational accommodations are sometimes appropriate, they have significant limitations, and are used excessively. They are therefore often ripe for de-implementation procedures.

Consultation Processes and Skills

Any de-implementation task confronts many challenges and therefore requires expert consultation skills. Erchul and Martens's (2010) Integrated Model of School Consultation is a helpful framework for executing de-implementation processes in educational settings. In this model, effective consultants begin by ensuring that they understand the dynamics of the schools and classrooms to which they are providing consultation. Some of this applies to any consulting task, such as knowing who key decision-makers in the school are, and what the culture of the teachers is like at a particular school. However, the most relevant dynamics for understanding accommodations are that schools are under increased pressure for high performance and test

scores, and teachers face an ever-growing list of demands on their time. Teachers are expected to differentiate instruction for students with disabilities, and test-based educational accountability policies apply to virtually all students in the United States and Canada, including those with disabilities. These factors lead to a climate where anything that could raise performance is desired. In some high-performing schools, much of the pressure for accommodations comes from students and families, particularly with regard to testing accommodations. Students may be in competition with each other, or are simply themselves under pressure for extremely high performance. Regardless of the source, high levels of pressure on teachers for high student performance creates a desire for accommodations.

In the Integrated Model, once consultants understand the dynamics of schools and classrooms, they can enter the service delivery network and begin performing three interrelated consultation tasks (Erchul & Martens, 2010). One is the *problem-solving task*. Briefly, accommodations are considered when there is a perceived problem—specifically, when there is a perception of a possible gap between desired student performance and observed student performance. Typically, consultants initiate a problem-solving process by interviewing consultees and inspecting other data to identify what the problem is and analyze what might be causing it. In the case of accommodations, we often find that process to be much more complex than it first appears. Indeed, there is often disagreement between different school staff, parents, and the student over whether any problem is present in the first place.

A second task is the *social influence task* (Erchul & Martens, 2010). Consultants rarely have any direct, official authority over consultees. Therefore, consultants must creatively use other social influence strategies to affect the behavior of teachers and school administrators. Several such strategies are especially relevant to consulting around issues of de-implementation. For instance, consultants can use expert power when they are perceived by the consultee as having specific expertise on a topic; therefore, consultants who convey more knowledge about accommodations will have more of this type of power—the consultee will likely trust that the consultant is correct. In addition, consultants can exert informational power to rationally persuade consultees to change their behavior (i.e., make different recommendations or decisions about accommodations). Here, the consultee does not simply trust the consultant's expertise but genuinely understands the evidence and arguments that the consultant puts forth and therefore changes their behavior. Finally, in reciprocity power, the consultant offers to assist the consultee, committing substantial time and effort, and the consultee feels a duty to reciprocate by doing what the consultant recommends. Later on, we apply each of these bases of social power with more specific examples.

The third and final consultation task is the *support and development task* (Erchul & Martens, 2010). This involves providing information, training, and emotional support to consultees. Effective consultants elicit consultee concerns and convey empathy, while also providing knowledge and skills. With regard to accommodations, teacher consultees may understandably fear that they will be blamed for poor student performance if accommodations are not given, and teachers may also need training and support in using alternatives to accommodations (namely, interventions). If families are a

source of pressure that leads to inappropriate accommodations, then administrators and other school staff may need training in how to best deal with families in a positive and professional manner while still advocating for appropriate accommodation decisions.

Functional Behavioral Assessment: A Preface to De-Implementation

In functional behavioral assessment (FBA), behavior is thought to be responsive to environmental contingencies. Antecedent variables can cue behavior, and consequences reinforce it. This is true of any behavior, whether adaptive or problematic. To conduct an FBA, a wide variety of information is solicited from informants who have witnessed the behavior, and the behavior and its context are also directly observed (Steege et al., 2019). FBAs are typically conducted in educational settings to address student misbehavior, but they have also been used occasionally to better understand and modify behavior of employees (e.g., Fienup et al., 2013). To understand an institutional practice such as inappropriate provision of accommodations, it is important to understand what variables are causing and maintaining the practice.

FBA-related data on the behavior of making educational accommodation decisions is often easily obtained; in our own consulting work, we collect it deliberately and also obtain it informally. However, such data is rarely published. Two studies have examined the behavioral dynamics of the accommodation process comprehensively, both of them at the middle school level and focused on *testing* accommodations (Crawford & Ketterlin-Geller, 2013; Rickey, 2005). The two studies' results converge with each other, and also with our own observations, having participated in and consulted on instructional and testing accommodation decisions for over a decade across various levels of education. In addition, there is other research specifically on psychologists and their opinions about their role vis-à-vis accommodations (Gordon et al., 2002; Harrison et al., 2013). We use the available published research as well as our own consulting experience to describe FBA-relevant data. Here we discuss three contextual variables that surround accommodations, three of the elements in Steege et al.'s (2019) FBA framework: background beliefs, immediate antecedents, and reinforcements.

Inaccurate Background Beliefs

Inaccurate background beliefs can set the stage for inappropriate practices, and in the case of inappropriate accommodations, several such beliefs are common, such as:

- Higher test scores are more valid; the student is now showing their real skills.
- Accommodations have no downsides.
- Accommodations only benefit students with disabilities.
- If the student does (or will do) better with accommodations, then this is enough reason to provide them.

- If the student has a disability, then they will need accommodations.
- Students should not feel any discomfort, stress, or anxiety when taking tests.

Among evaluators (school psychologists as well as clinical psychologists who perform evaluations), additional inaccurate beliefs are often present:

When a student or family is seeking accommodations, my job is to assist them in obtaining accommodations.

If a student has a past history of receiving accommodations (or reports of such a history), then the student must need the accommodations, and the present evaluation is simply to update the details.

There is no need to worry that a student or family may exaggerate a student's degree of impairment to try to show a need for accommodations.

All of these beliefs are false, contradicted by empirical research (see Lovett & Lewandowski, 2015, for a comprehensive review). Unfortunately, all of these beliefs create a context where the dominant response is to provide an accommodation.

Immediate Antecedents

Providing accommodations is typically a response to at least one of a small set of antecedent stimuli. One is inadequate academic performance, relative to expectations. The key phrases here are "inadequate" and "relative to expectations." What counts as "inadequate" depends on the expectations, and in some settings, a "C" grade is viewed as satisfactory and untroubling, whereas in other settings, an A-minus grade is cause for great concern. Often, the expectations are based on a student's background, and so students from disadvantaged backgrounds are less likely to receive accommodations (Lovett, 2020), since expectations are lower, and relatively low performance is viewed as reasonable.

A second, related antecedent stimulus is *anticipated* inadequate performance in the future. This often occurs when a student switches schools, graduates from one setting to another, or prepares for a major exam (such as an AP/IB exam or a college admissions exam). Although the student has a history of high performance, they (or their parents) are concerned that a new educational environment has higher standards or fewer natural supports, or that an upcoming major exam has requirements against which the student's hitherto-adequate skills cannot succeed. Psychologists and other school staff may be skeptical of the requested accommodation, given the history of unaccommodated high performance, but neither they nor the family can point to any definitive data predicting what will happen in the future, and accommodations allay the concerns over what might happen in the future.

A final antecedent stimulus is the student's discomfort relating to some aspect of the educational program. That discomfort can present as anxiety, sadness, low selfesteem, or even anger and oppositionality, and it may or may not be accompanied by actual evidence of poor academic performance. To take an extreme case, if an elementary school student exclaims "I hate math!" and pouts as a math calculation subtest

begins, even though his score is in the average range, the school psychologist administering the measure may begin to wonder if the student might feel better taking his teacher's math tests with a calculator and some additional time in a separate room where the test proctor is a kindly teaching/resource assistant who the children like to talk to, and who gives hints when the student needs more "memory cues." When children are uncomfortable, parents and school staff understandably empathize and feel uncomfortable as well, leading to powerful escape motivation.

Consequences

What happens after accommodations are provided? Often, student performance improves. The most common accommodation, extended time on tests, tends to yield performance gains for both students with and without disabilities (Cahan et al., 2016). Similarly, if a student was concerned because her foreign language class was bringing down her GPA, and she no longer needs to take the class (a common curricular accommodation in the United States), her GPA will improve. Higher academic performance is desired by virtually all parties: students, parents, teachers, school administrators, and even psychologists. Some private practice psychologists even publicize client testimonials attesting to this, to attract new clients; see, for example, Cognitive Assessment Group (2020). This not only serves as positive reinforcement for providing accommodations, but negative reinforcement as well—parents stop calling the school and requesting evaluations and meetings, and teachers and school administrators stop bothering the school psychologist to do something.

In addition, students with and without disabilities both *perceive* accommodations as beneficial, and so regardless of whether the accommodations are needed or appropriate, the accommodations tend to reduce their discomfort (Lovett & Leja, 2013). The student is therefore provided powerful and direct negative reinforcement for using accommodations. For example, many students who receive extended time accommodations use them even on unspeeded assessments that they finish well within the standard time limit, saying that they still need the accommodations to reduce their anxiety. Unfortunately, accommodations do not teach students to cope with anxiety, and only teach escape and avoidance, which ultimately tend to make anxiety worse (Lebowitz, 2019).

The background beliefs, immediate antecedents, and consequences reviewed above are key to understanding why inappropriate accommodations practices persist. These FBA data serve as the bridge from general consultation skills to de-implementation. Typically, FBAs target inappropriate behavior by students, but in this case, the FBA has helped to explain misbehavior by school staff—the inappropriate provision of accommodations—and suggests techniques for effectively reducing (de-implementing) that misbehavior.

De-Implementation Procedures

We have found several de-implementation procedures to be helpful, and each is based on both the FBA data that we have reviewed, as well as the more general consultation model provided by Erchul and Martens (2010).

Staff Training

Staff training aims to address the background beliefs that too often lead to inappropriate accommodations. School staff should be given research-based training sessions on accommodations and related topics. This is something for which school staff have indicated a need when surveyed (e.g., Davis, 2012). We have given many trainings to school psychologists, teachers, and administrators, reviewing such things as why accommodations are given, the legal regulations governing accommodations provision, what counts as valid evidence of a need for accommodations, and what the effects of accommodations tend to be on the quality of instruction and assessments. Participants are often surprised by the research findings, and also often admit to not having ever fully understood the rules around accommodations.

We start trainings by conveying an understanding of the participants' perspective—a foundation of all good consultation (Erchul & Martens, 2010). Sometimes we ask audiences for the questions about accommodations that confuse or trouble them most, or ask them to describe recent difficult situations where accommodations issues arose. We also acknowledge at the outset the constraints that school staff are under: pressure for high(er) student performance, limited resources, and a need to attend to many tasks other than making accommodations decisions. Then, we can proceed to covering the major topics, culminating in an evidence-based model for accommodation decisions.

Effective trainings on accommodations include both didactic and practical components (Braden et al., 2005). In the latter part of our trainings, participants review sample cases—often taken from the local setting, since participants can better relate to cases similar to those that they typically see. In an initial case, a trainer walks through how to apply the evidence-based model. Then, the participants (often working in small groups) are given additional cases to which to apply the model. Finally, the participants are given feedback on their attempts, and have the opportunity to ask questions to extend the model to other cases.

Throughout the trainings, we weave in the consultation skills that Erchul and Martens (2010) discuss. When the information presented is relevant and provided within a context of understanding the difficulties of the audience members' roles, this fulfills the support and development role of consultants. Clear presentation of data and persuasive, logical arguments concerning accommodations also helps to confer expert and informational power to consultants. To attain reciprocal power, we offer continued assistance to audience members after the training is done. Finally, our use of case studies from the local setting helps to perform the problem-solving task of consultation.

Providing Alternative Responses: Interventions

After completing an FBA, and determining what reinforcement is maintaining misbehavior, alternative behavior options are often suggested, to allow the individual to access the same reinforcement but without engaging in the problem behavior (Steege et al., 2019). Since improved student performance and reduced anxiety/discomfort are the typical reinforcers for the behavior of giving accommodations, alternative

strategies for pursuing those reinforcers must be provided. These alternative strategies are typically interventions for academic skills and for anxiety. School psychology and special education research has yielded many effective interventions for academic skills (see, e.g., Burns et al., 2017), including many skills that are needed for access to instruction and assessment in their standard formats. For instance, training in reading fluency, reading comprehension, and writing skills can reduce a need for extended time, read-aloud, and note-taking accommodations, respectively. Anxiety is also one of the more treatable conditions, even when it is at the level of a clinical disorder, and research has found effective interventions for children (Higa-McMillan et al., 2016). Since test anxiety is often related to a perceived need for accommodations, school staff should be aware that there are specific interventions for test anxiety that have been found effective (Soares & Woods, 2020).

Admittedly, replacing accommodations with interventions is not a simple task. When school staff—who have many responsibilities—have a choice between two alternative courses of action, it is understandable that they will choose the one that is perceived to require less effort. Often, it is less work in the short term to administer accommodations than interventions, and consultants can acknowledge this fact. However, school psychologists should remind teachers and administrators that the end goal, whenever possible, is increasing students' skills, and in the end, effective interventions that raise those skills can prevent further need for accommodations, while supporting students' autonomy and eventual independence after graduation. It is not enough to motivate school staff to want to use interventions; staff must also have sufficient skills to deliver them. The field of implementation science offers many insights into how to address both the motivation and skills of staff to use interventions (e.g., Lyon et al., 2019).

Removing the Antecedents

Taking a wider perspective, school-based psychologists have an opportunity to consult with school and district-level administrators to try to prevent pressures for inappropriate accommodations before they start. First, effective instruction, with additional supports for students falling behind, will reduce the incidence of academic performance problems. Explicit, direct instruction in core academic skills, where students are given frequent opportunities to respond and practice their developing skills, will be effective for most students, but many schools' curricula fall short of these characteristics. If students are falling behind (i.e., not making expected progress over time in academic skills), then they can be given more intensive instruction, often in a smaller group setting. When implemented in a timely manner, such a process will reduce the number of students for whom accommodations will ever be suggested.

Relatedly, the antecedent of distress can be reduced through effective classwide (or schoolwide) socioemotional learning practices. Some of these are formal programs that target emotion regulation skills. For instance, the RULER program (e.g., Brackett et al., 2019) teaches students to identify and modify negative emotions that occur in response to events such as a classroom activity that a student does not like, or an

announcement about an upcoming exam. Other practices that are especially relevant involve stress management skills, because the available FBA-like data suggest that stress leads teachers, parents, and students themselves to all seek accommodations for students. Importantly, the expectation is not that these practices will increase academic achievement, but that they will simply reduce student distress.

Finally, universal design for learning (UDL) involves designing educational programs that are accessible to as many students as possible, which can lessen the need to provide accommodations (CAST, 2018; Ketterlin-Geller, 2005). In the context of instruction, universal design provides multiple ways of representing and expressing information for *all students*. For instance, when presenting information, a teacher will use visual cues as well as speaking. In the context of assessment, similar flexibility is provided, but additionally test-makers (including classroom teachers) carefully define what their target skills are, and try not to measure other skills. For instance, if a test is not designed to measure speed, fluency, or automaticity, then liberal time limits are provided for all students, with further availability of additional time if needed. Removing unnecessary and arbitrary constraints on assessment administration conditions, and providing instruction using multiple formats, keeps students from needing accommodations that differentiate them from peers, and helps to eliminate the unfairness issues that some accommodations lead to.

Conclusion

Educational accommodations are an important part of many students' academic programs, but used inappropriately, they have many limitations. De-implementing inappropriate accommodations is a delicate matter, requiring general consultation skills as well as a careful understanding of what causes and maintains this problematic practice. However, a number of de-implementation strategies are available. Moreover, in our experience, once a school psychologist (or an entire school or school district) gains a reputation for not recommending or providing undue accommodations, people do not automatically expect that accommodations will be provided, resulting in fewer requests to handle.

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Note

Some scholars distinguish between accommodations and modifications. We do not, since
there is no agreement on whether particular alterations (e.g., extended testing time) are one
or the other. We use the term accommodation broadly to encompass any official alterations
to the manner of instruction or assessment.

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