Review of the Reasonable Accommodations in Certificate Examinations (RACE) Scheme

Submission from Dyslexia Ireland, May 2026

Introduction

Dyslexia Ireland welcomes the opportunity make a submission to the current review of the Reasonable Accommodations at Certificate Examinations (RACE) being carried out by the State Examinations Commission (SEC). We recognise that this review is an important opportunity to bring the RACE scheme in line with international best practice ensuring, that it meets the needs of our candidates with dyslexia, dyscalculia and other additional needs.

In this submission we set out a range of issues that present difficulties for dyslexic students when they are undertaking examinations as part of the Junior Cycle and Leaving Certificate. This is based on our many years' experience as the national advocacy groups for students with dyslexia and dyscalculia. It has also been informed by a recent extensive survey of parents/guardians and students. We have shared some statistics and illustrative quotes from our survey in this submission to highlight key issues.

This submission takes a solution focused approach to assist the review process where we set out the issues but also go on to propose practical and tangible steps to address each. We feel that if these recommendations are implemented then it will improve the experience of dyslexic candidates, remove existing barriers and ensure that they are supported to achieve their potential in formal state exams.

1. Accommodations

1.1 Reading Assistance

We are not sure how easy or optimal it is for a candidate to share a reader with other students. We feel that there is real risk that sharing a reader may involve students having to wait if the reader is assisting other students. And asking for their attention at any point is also an additional interpersonal demand that takes time and might not be suitable for a candidate who is less assertive. Meeting a reader for the first time on an examination day can also be challenging, making students uncomfortable and also having no experience of the readers accent or intonation.

> "Sharing a reader among 8 students in a room is unhelpful. My daughter is not comfortable having to constantly ask the reader."

Recommendations:

1. Individual readers should be maintained and shared readers discontinued. The candidate should have the opportunity to meet with the reader to explain how the process works and to practice within the parameters of what is permitted.

2. Candidates should be provided with a digital examination booklet that can be read aloud using text-to-speech technology. This can be combined with the use of a laptop for students who require this. Candidates should be provided with past papers to practice the technical skills required, as well as having the opportunity to sit school tests and mock exams under these conditions before the state exams.

1.2 Spelling and Grammar Waiver

It has sometimes been suggested that the Spelling and Grammar waiver exists 'in lieu' of extra time. We would strongly contest the logic and sentiment of this statement. Extra time accommodates a whole range of different issues that are not addressed with the provision of a waiver. It accommodates reading speed issues, processing speed issues, writing speed issues, tiredness and fatigue. Also, a waiver exists in only language subjects and so, even if it did act as an alternative instead of extra time, (which it doesn't) it does not address these needs in all other subjects. Removing the spelling and grammar waiver would constitute direct disability discrimination, penalising dyslexic candidates for a difficulty that is a core feature of their neurodivergence.

> "No Leaving Cert dyslexic student will spot their spelling errors when under pressure. They may also dumb down their written expression for fear of misspelling a word."

Recommendation:

3. The spelling and grammar waiver should be maintained for any subject where spelling grammar and/or punctuation is part of the marking rubric.

1.3 Extra Time

Adequate extra time helps to overcome the disadvantage caused by dyslexia, dyscalculia and other learning difficulties in timed examinations, and will level the playing field in line with international best practices at second level, and with third level practice here in Ireland.

The interim measure of 10 minutes per exam is clearly not enough. Only 5% of surveyed parents and students felt it was sufficiently helpful. Extra time also needs to be a stand-alone option accessible alongside the other accommodation options. Some candidates may only need extra time, while the degree of other candidates' challenges may require access to several accommodations in order to have their disadvantage addressed.

Extra time would address needs not accommodated by existing available accommodations, including the spelling and grammar waiver. Standalone extra time is particularly needed for students with dyscalculia, some of whom currently receive no accommodations as criteria is based primarily on literacy scores.

85% of our survey respondents said that there should be a minimum of 25% extra time.

> "Extra time is needed for me to be able to read these questions and understand them to the best of my ability without having to stress and read it fast so that I will get the exam done in time."

> "Sitting high-demand exams for several hours places a disproportionate burden on students with learning differences."

With the provision of an appropriate amount of extra time per hour of any exam, the overall exam timetable will need to be modified to allow for longer breaks between morning and afternoon exams. There needs to be commensurate reduction in the length of the overall exams for all, but this is a desirable change aligned with Senior Cycle reform as shorter exams harm nobody.

> "Why do we insist on making children hand write their exams for 3 hours. This is not a fair test of ability. It is simply an endurance test that favours the few."

> "Extra time should not mean that students receiving it get suboptimal break time between exams."

Recommendations:

4. Extra time of at least 25% per hour of an exam should be introduced as a stand-alone accommodation for all subjects. The criteria to access extra time must not be based only on literacy test scores. Candidates should be able to combine extra time with other accommodations as required. Sufficient break time between exams should be ensured.

5. Extra time should also be made available in end of term school tests and mock exams, to the same level that will be allowed in terminal exams, so that students have practice opportunity with additional time. If this involves the use of a separate centre, then this should also be provided in conditions as close as possible to those of the formal Junior and Leaving Certificate exams.

1.4 Assistive Technology

There is a need to provide students who are using a laptop to complete their answers with an editable PDF document, that is pre-formatted in the same way as the hard copy exam answer book, so that students do not have to take time to set out question numbers and format the blank page, with the risk of errors that could lead to losing marks if those marking the paper are unclear as to the intentions of the candidate (e.g. wrongly numbering an answer or omitting an answer number causing confusion for the marker).

Students using a laptop also need to be provided with clear steps and support to guide the student around saving and or submitting/printing their answers.

The use of familiar text-to-speech and speech-to-text functionality (e.g. Dictation or Read Aloud in Microsoft 365) should be made accessible to interact with the editable digital

answer book. 75% of parent/student respondents felt that speech-to-text should be supported as this mirrors student's normal way of working. Over half of students/parents felt that candidates should be permitted to use their own device in the exam, rather than an unknown device, as again this would reflect their normal way of working.

Recommendations:

6. For any exam where a laptop is being used, candidates should be provided with a pre-formatted digital examination answer booklet that can be completed in a way commensurate with their peers who are using a hard copy answer booklet. They should also be able to use either their own laptop or a device they are familiar with.

7. Students should have training with this technology using practice examples (e.g. past papers provided in this format) so that they are familiar with the technical requirements (e.g. moving between text boxes, how to submit the paper at the end of the exam). None of this should be new to the student, or school, on the day of the exam.

8. Dyslexic students who make significant use of text-to-speech and speech-to-text as their normal way of working in school, should have access to this same technology in state examinations and this should be compatible with the digital examination answer booklet. This technology should also be available in practical exams, not only in the final June exams, requiring the SEC to make earlier decisions.

2. Eligibility Criteria

The current reliance on rigid testing cut-offs as part of RACE criteria risks excluding students whose difficulties are genuine and well-recognised in everyday educational settings. Whilst the current guidance refers to 'normal way of working' as a principle of establishing eligibility, the reality is that there are strict disqualification criteria for each accommodation, including arbitrary cut off scores in word reading or spelling, and similar arbitrary cut offs for error count and speed of reading/writing.

Using single scores, of one skill, on one day, to determine access to potentially life-changing accommodations, flies in the face of all best practice in term of educational testing and wider moves here in Ireland towards a needs-based model of resource allocation.

With regard to word reading and spelling, there is no scientific evidence to justify the specific use of the score of 85 as a cut off, apart from the property of it being a standard deviation from the norm – a statistical property that has no rationale for use to establish a threshold of educational need.

A student may read individual words accurately yet still face substantial barriers due to slower processing speed, increased cognitive load, fatigue, and difficulties with comprehension under exam conditions. Reading accuracy alone is not an adequate indicator of exam access needs. The ability to decode text does not guarantee understanding,

interpretation, or efficient response. Greater weight must be given to processing speed and the functional impact of a student's difficulties. Depending on an error count score from previous tests may not reflect the fact that many students will actively avoid words that they may misspell, which renders error count as evidence of need invalid.

Finally, schools are often very nervous about putting in place accommodations during term time and school exams for fear that the student becomes dependent on them but is then refused these accommodations as part of RACE. Yet the SEC also asks schools to consider what has worked for the student during the year and what their normal way of working is. This in effect creates a disincentive arising from the current arrangements.

> "Stop stripping students of accommodations simply because they passed an in-school test which does not mimic real examination conditions."

> "A scheme intended to ensure fairness should not place students in the position of having to "qualify" for support while their functional difficulties are effectively minimised."

> "I wish I could have gotten what I needed instead of what one test showed."

> "I would have been in the top 10% for junior cert English if they hadn't revoked my spelling exemption. I was deducted the full 10% of marks they can deduct. There is no world where I could have done better. "

> "My daughter missed out on the spelling waiver by 0.8% even though her English & Spanish teacher said she needed it. She is absolutely devastated and has been very stressed about these 2 subjects for her mock exams. Dread the stress for her in June."

Recommendation:

9. Eligibility for accommodations should be based on evidence that does not include the use of single score testing, and should move to evidence of need better reflecting students' normal way of working.

3. Timeline for Applications and Decision

Junior Cycle students are currently only advised on the outcome of RACE applications late in Third Year, and in some cases only a few weeks before examinations commence. This is unnecessarily late. It causes undue uncertainty about what accommodations will be provided, preventing the student to practice with the accommodations including during school tests or mock examinations. Almost two thirds of parents surveyed commented that they did not find out about the outcome of their application early enough, to be able to practice with the accommodation in school tests or mock exams.

All students should know well in advance what accommodations will be available to them in their exams for Junior Cycle and Leaving Certificate. This would provide clarity, reduce anxiety, and most crucially allow students to practice with their accommodations in school tests and mock examinations. Contingency arrangements should continue to be provided for

later applications as per current practice, where needs were late identified or where needs increased necessitating additional accommodations.

The lack of guarantee about accommodations can also lead to schools discouraging the formative use of an accommodation (e.g. use of a laptop) earlier in a young person's school career, as it is seen that it may disadvantage the student if they come to depend on an accommodation that is subsequently taken away from them for state examinations. The stress of being denied an accommodation, or just the worry of being denied it, causes students untold stress and anxiety that is completely avoidable if RACE decisions were made and communicated earlier.

This is the case even for students whose normal way of working is to use a laptop, or students for whom a grant was provided by the Department of Education to help with the purchase of necessary assistive technology. And yet even in these cases there is no guarantee that these students will be allowed to use this technology in an exam.

Some contributors to our survey have also suggested that evidence from primary school (e.g. Student Support Plans) could contribute to the RACE eligibility application, as often needs have been well evidenced over time, even before moving into a post-primary environment.

> "I would love to see race applications complete in the years prior to exam years."

> "Maybe do the assessment in first year. Can still repeat it if it comes out borderline."

Recommendation

10. All students should know by December of Second Year the accommodations that will be available to them for Junior Cycle examinations (and reactivated for Leaving Cert.). Timelines for RACE applications should adjust to enable this. Students can then work with the accommodations in class (e.g. laptop) with confidence, and have ample opportunity to access school tests and/or mock exams with the same arrangements, as well as avail of the accommodations in any project or practical examination components done ahead of the terminal exams.

4. Universal Design Approach

Many dyslexic learners have commented on the unnecessarily complex vocabulary, phrasing (e.g. double negatives) and high word count in exam papers, which creates an undue barrier for individuals with dyslexia and other additional needs. Research has shown that Ireland does not compare well on this issue of readability of exam papers when compared with other equivalent jurisdictions.

Recommendation:

11. Rules on the readability level of exam papers should be established, and all exam papers should be checked against these each year to check that they align with plain English/clear language principles, and to ensure that they are accessible by design.

5. Engagement with Service Users

Where 60% of parents/students are reporting 'extreme stress' or 'significant stress' caused by the RACE application process, there is clearly scope for improvement.

Schools need to be more proactive with parents, as parents felt that they often had to lead or kickstart the RACE application process despite their child being known to the AEN department and having clear identified needs. Students should not be depended on as the interlocuters between home and school. Schools could have an annual RACE information evening or webinar for relevant parents.

Iterative evaluation of the RACE scheme should be carried out with a survey of all candidates (not only those who were granted accommodations but all potential applicants) and parents/guardians on the application process, how well arrangements worked for them, and ideas for how the system might be improved. A system without this annual feedback loop will be blind to what, and how, improvements could be made. An evaluation should also be carried out with schools with a focus on the practical arrangements at the level of an individual exam centre, and to understand the challenges schools face in operating the scheme at local level.

Young people commented that the eligibility criteria and application process makes them feel like it serves more as an opportunity to take away something, rather than confirm eligibility based on genuine need, and normal ways of working. It also implies that this is some sort of benefit that they should be grateful for, rather than something that is their right as a reasonable accommodation under the Equal Status Act. This can lead to shame or guilt about receiving certain accommodations, or deep anxiety if something is removed that is their normal way of working.

Recommendation:

12. Service users should be surveyed each year (both successful and unsuccessful applicants), and results published by the SEC. Opportunities to make iterative changes to the next year's scheme should be implemented in a timely manner.

Concluding Comments

Dyslexia Ireland welcomes the opportunity make a submission to the current review of the Reasonable Accommodations at Certificate Examinations (RACE) scheme. We recognise that this review presents a significant opportunity to bring the RACE scheme in line with best practice to meet the real needs of dyslexic and dyscalculic exam candidates.

The following final quotes allow the voices of students and their parents to illustrate the importance of keeping the service user central in the design and implementation of the RACE scheme, and any improvements that can be made. We deliberately choose to conclude this submission by giving them the final words…

> "The current system is a shambles. An exam is supposed to assess what a person knows. The current system hinders [dyslexic] students and does not provide a level playing field."

> "It feels like the department is actively encouraging schools to have as few students with accommodations as possibly (sic). The schools circular and documentation are outlining that visits, audits and reviews will occur if a school has too many students applying for RACE who had not previously received accommodations at Junior cycle."

> "[There is a need to] be more supportive of the issues of kids .. go in to schools speak with the student who are doing the exams. Total lack of understanding of how difficult and stressful the exams are, never mind the pressure."

> "The attitude towards the accommodations [needs to change]. I am not looking for my child to have an unfair advantage in applying for these accommodations"

> "The SEC are too defensive - they need to have actual conversations with actual parents and students and not try to just make the easiest system work."

> "The exam system needs to change because it is very hard for me to find the will to go to school. I hate school so very much because I feel stupid and dumb and over looked.

> "My experience for Junior Cycle was awful. I was told my daughter didn't meet the criteria needed. I was sent back and forth between the school and RACE with each blaming the other on different things for weeks. On trying to appeal I was told there was nothing to appeal as my daughter didn't meet the necessary criteria regardless of the diagnosis (which is considered irrelevant) and RACE had no paperwork about my daughter as she didn't meet the criteria. I still don't understand how we can't appeal or what the appeal process is about, if you can only appeal if you received accommodations. I don't see why it would be necessary to appeal if you had received accommodations. I tried everything I could I was in touch with the school, RACE, SEC, DAI, politicians and all in the very short space of time before the exams. In the end my daughter was so stressed our doctor had to advocate for her to get a shared centre because of anxiety. This did help a great deal but even fighting for this was stressful with us only finding out at 5pm the day before she sat her first exam."

> "It really feels with the current arrangements as if they really don't want students with AEN to succeed or truly do well, not to the point where they are able to perform to the same level as equally skilled peers in a given subject."

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