# **Documentation Needs for the NBME**

### **Letters of Support**

Generally speaking, letters of support should come from a licensed medical or psychological professional with experience and expertise in diagnosing the disability. In addition to a provider letter of support, the Director for DGSOM Disability Services will complete the required form for documenting the student’s use of accommodations in medical school and create a detailed letter regarding the student’s eligibility under the ADA for accommodations.

**Provider Letter of Support**

Providers letters should include qualitative information about the disability and how it impacts the student in the medical school setting. This letter should also include a statement about the approved accommodations at DGSOM and the provider’s rationale for recommending/supporting the accommodations. This letter and the student’s statement should include information about any changes to the accommodations and any extenuating disability related issues that support the application for accommodations on the exam. The goal for the letter is to capture information about the **need\*** for accommodations and how the disability impacts the student in academic and personal settings.

\*Providers should avoid using phrases such as “would benefit from…” or “to ensure their success on…” as they may indicate a focus on success rather than access.

### **Supporting the History of Disability**

To the extent information is available, DGSOM Disability Services will assist the student in gathering other articles to serve as “evidence” of a disability. However, if students have mentioned or discussed signs of the disability that went previously unnoticed during appointments, it can be helpful to include this in the provider letter of support.

The goal of the DGSOM Disability Services Office is to assist in building an “air tight” argument reflecting that the student is:

1. A student with a disability
2. The disability acts as a barrier to the exam
3. Accommodations will level the playing field, making the exam accessible

Provider letters that clearly outline the functional limitations while linking the disability barrier(s) and requested accommodation(s) are critical in creating a strong request for accommodations on the USMLE Step examinations.

# **Types of Accommodations**

Commonly requested accommodations and points of consideration for each:

#### Extended time (standard time +25%, 50%, 75%, 100%)

Extended time accommodations are more likely to be approved if the request is based on concrete evidence from the documentation that supports the disability-related need for the accommodation, and if the student has a history of receiving such accommodation. The request and suggested accommodation(s) should be based on the amount of time the student has received historically. For example, a student should not request 100% extended time if they have never been approved for 100% extended time before. There should be a clear rationale for all requests in the application.

#### Additional or extended rest breaks

For the USMLE, all test takers are given 45 minutes of break time for authorized breaks during the exam; however, students may request to have additional rest breaks added to the exam day as an accommodation.

Instead of requesting an accommodation for multiple brief rest breaks, the student can request to have additional time added onto a standard break provided to all students taking the exam.

[**Directly From the NBME: BREAK TIME**](https://www.usmle.org/bulletin/testing/)

*If you have ADHD or another disability that benefits from the opportunity to take a brief break to clear your head, this accommodation may be worth considering. On the USMLE exams, it may be more appropriate than extended time as it gives you the opportunity to refocus your thoughts versus extended time, which can lead to exhausting testing conditions.*

*If you have health concerns that need monitoring, you may also wish to request additional breaks to check blood sugar levels, grab something to eat, or to take medications. (See also: personal item exemptions). You should request the specific amount of time needed for each break (e.g. a 10-minute break at the end of each exam section) as well as the frequency of breaks (e.g. after each section of exam or every hour of exam time).*

*Pregnant or new mothers may request additional break time for restroom breaks or for lactation needs. Requesting additional break time may entails filling out a* [*brief form*](https://www.usmle.org/pdfs/test-accommodations/additional_break_time_standard_testing_time_request_form.pdf) *and providing relevant supporting documentation. The wait time for a response from the NBME is typically 30 days if you are requesting additional break time only.*

If this accommodation is approved, the NBME will tell the student how the approved breaks will be structured so they are prepared on the day of the exam for what will be provided.

#### Multi‐day testing

This accommodation may be of significant benefit to someone whose cognition, physical ability and energy level, or eyesight fatigues over a period of intense focus. Supporting documentation should specify the amount of time a test taker can work on an exam per day.

If the student is requesting breaks and/or additional time, it should be noted that the exam will automatically be split over two days.

#### Testing in a Private Environment

If the student experiences high levels of anxiety, distractibility, inattention, panic attacks, or similar disability related concerns they may wish to request this accommodation. If the student requires a private space for talking out loud or briefly stepping away from the computer to assist with comprehension, focus, or managing anxiety they may find that a private environment is necessary to allow them to use these key techniques to maximize their performance and to manage the symptoms without disturbing others.

**Note:** It is important to decide whether breaks might be helpful in order to use calming techniques in addition to, or in lieu of, this accommodation.

#### Personal item exemptions

If the student needs to bring anything into the exam that is related to their disability and considered “non-standard” such as food, water or medication, a special cushion, hearing aids or cochlear implants and other medical devices, they will need to have this approved in advance of the exam. Some students are asked to send a photograph of their device as part of the approval process. These requests generally do not require the same “burden of proof” that other accommodations require. Often the documentation requirement is a letter of support from a medical doctor stating the nature of the condition and the reason why the item is needed. We have reports of students needing to declare items like leg braces, crutches, etc. A good rule is to declare ANYTHING and allow the NBME to determine if such a declaration is not needed.

**Note:** The number or type of accommodations requested by the student will not impact the likelihood of an approval or denial – only the clear demonstration of disability and associated functional limitations. Students may ask for less than they currently utilize for fear they will look unreasonable. Alternatively, the student may ask for more assuming they will only receive partial approval (example: currently utilize 50% additional time, request 100% additional time for Step). This has not been demonstrated to be the case. Our recommendation is for the student to ask for any accommodations required to mitigate the disability impact during the exam, and most often, in alignment with the accommodations they have have been receiving in medical school.

#### Newly Diagnosed or No History of Accommodations

If a student does not have a history of accommodation or has been recently diagnosed with a disability, it is helpful if the provider can speak to the “why now?” The NBME will want to know why the student has successfully gained entry to medical school without accommodations, but now experiences difficulty accessing the education curriculum.

References:

* Clifford, GC. Disability Access in Higher Education: Documenting as University Health Service Providers. In J. Vaughn & A. Viera (Eds.), Principles and Practice of College Health. Switzerland: Springer Nature AG. 2020.
* Jain NR, Meeks LM, Lewis C. Requesting Accommodations on Certification, Licensing, and Board Exams: Assisting Students Through the Application. New York, NY: Springer Publishing. In: Meeks L M, Jain N R, & Laird E P (Eds), Equal access for students with disabilities: The guide for health science and professional education, 2nd edition. New York, NY: Springer Publishing Co.; 2021.
* Meeks LM.  Coalition for disability access in health science education student resources. Retrieved from HSM Coalition: http://www.ahead-archive.org/conf/2017%20Conference/ Handouts/7.2/UCSF-USMLEpacketforstepexams.pdf. 2016

**Documentation Quick Reference Outline for Providers**

Providers should include the following in their letters of support:

* Credentials/qualifications
  + Submitting a current CV in place of a narrative is acceptable
* History of interaction/service provision with the student
  + If the student was transitioned to a new provider due to position transitions making them inaccessible for documentation requests, the new provider may make direct reference to information included in the student’s clinical notes
* Diagnosis/Diagnoses
* How the diagnosis was reached
  + Tests/Measures utilized in the determination (if any) should be included
  + If the diagnosis was based on self-report, the provider should be as detailed as possible about the statements or observations made that led to the diagnosis
  + If the diagnosis was given by another provider, the current provider should state that and mention any personal observations or statements that reaffirm the diagnosis
* Functional limitations created by the disability
  + Providers should be as detailed as possible about the impact the disability has on the student’s life
  + Include examples of impact to academic, social, and (if applicable) professional life
* Clearly state **required** accommodations and clear link to the disability barrier it reduces or removes