

<p style="text-align: center;"><b>CORRESPONDENCE</b> <b>MEETING OF THE METROPOLITAN DISTRICT OF LIMERICK</b> <b>20<sup>TH</sup> JANUARY, 2025</b></p>
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- Email dated 18<sup>th</sup> December, 2024 from the National Transport Authority in reply to Notice of Motion from Members that Limerick City and County Council writes to the National Transport Authority (NTA) and any other relevant state authority, to seek funding support to provide free buses for all passengers on key routes into Limerick City at weekends, so as to increase footfall and business activity in the City Centre.
- Letter dated 9<sup>th</sup> January, 2025 from the Assistant Principal Officer, State Examinations Commission in reply to Notice of Motion from Members to write to the Minister for Education in support of Dyslexia Ireland's call for young people with dyslexia, and other forms of neurodiversity such as stammers, dyspraxia, ADHD and Autism, be given extra time in state exams.

## Carroll, Siobhan

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**From:** oireachtasliaison <oireachtasliaison@nationaltransport.ie>  
**Sent:** Wednesday 18 December 2024 11:12  
**To:** Metro Meeting  
**Subject:** [EXTERNAL]RE: Resolution adopted at September Meeting of Metropolitan District of Limerick - FAO Mark Leahy

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Dear Mr Leahy,

I refer to your correspondence dated 17<sup>th</sup> September 2024 regarding a motion that was adopted at the September meeting of the Metropolitan District of Limerick. Our apologies for the delay in responding.

The NTA is not in a position to agree to free travel in Limerick City at weekends as there is no funding in the Authority's PSO (Public Service Obligation) budget to support such a proposal. In addition, it would be difficult to justify this initiative without extending it to other cities or nationwide. This would of course have even more significant impacts on the Authority's budget and would reduce funds available for the provision of vital new or enhanced public transport services at a time when demand for public transport continues to grow year on year.

I trust that the above is of assistance.

Yours Sincerely,



**Richard Kelly**  
Higher Executive Officer & NTA Oireachtas Liaison, Public Affairs Unit  
Údarás Náisiúnta Iompair | National Transport Authority  
Teach Mhargadh an Fhéir, Margadh na Feirme, Baile Átha Cliath 7, D07 CF98  
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I gcomhréir leis an mbeartas maidir leis an gCeart chun Dísceangail de chuid an ÚNI, má tá an ríomhphost seo á fháil agat taobh amuigh de ghnáthuaireanta oibre, nílím ag súil le freagra ná gníomh uait taobh amuigh de d'uaireanta oibre féin.  
In accordance with NTA's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours.

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**From:** Metro Meeting <[metrometing@limerick.ie](mailto:metrometing@limerick.ie)>  
**Sent:** 17 September 2024 14:51  
**To:** CEO <[CEO@nationaltransport.ie](mailto:CEO@nationaltransport.ie)>  
**Cc:** Metro Meeting <[metrometing@limerick.ie](mailto:metrometing@limerick.ie)>  
**Subject:** Resolution adopted at September Meeting of Metropolitan District of Limerick

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**Coimisiún na Scrúduithe Stáit**  
*State Examinations Commission*

*Corr na Madadh, Baile Átha Luain, Co. na hIarmhí, N37 TP65.*  
*Cornamaddy, Athlone, Co. Westmeath, N37 TP65.*

Mr. Mark Leahy  
Corporate Services  
Limerick City and County Council  
Corporate Headquarters  
Merchants Quay  
Limerick

09 January 2025

Dear Mr. Leahy,

I refer to your letter of 7 November 2024 addressed to Ms Andrea Feeney, Chief Executive Officer (CEO) of the State Examinations Commission, in relation to resolution adopted at the meeting of the Metropolitan District of Limerick held on 21 October 2024 to support Dyslexia Ireland's call for young people with dyslexia and other forms of neurodiversity such as stammers, dyspraxia, ADHD and autism to be given extra time in State examinations. The CEO has asked that I respond to you on her behalf, and has approved this response.

The following information may be of assistance in understanding the scope and scale of the scheme Reasonable Accommodations at the Certificate Examinations or RACE Scheme. Information about the extensive range of supports available to students with learning difficulties is provided as well as details of how additional time applies in the examinations and the supports provided in lieu of additional time. Finally, I am providing you with details of the planned review of the RACE Scheme by the State Examinations Commission (SEC).

At the outset, I might assure you that the SEC takes very seriously its obligation to provide access to the certificate examinations for students with special educational needs. As an organisation providing a service to the public, the SEC has a duty to make the service equally available to as many people as possible. Many (but not all) of the access arrangements available in the State examinations arise from our duty to provide reasonable accommodations to candidates. To demonstrate this commitment, I can advise that, almost one in four candidates at the 2024 certificate examinations were provided with some form of reasonable accommodations within the RACE Scheme to support them in accessing the Leaving Certificate, Leaving Certificate Applied and Junior Cycle examinations.

**a. Background to the RACE scheme**

*Accessibility by Design*

- Access to the State Certificate examinations is facilitated, in the first instance, by developing examination papers and other test instruments that are designed to be as accessible as possible to the broadest range of candidates, including those with special educational needs.
- All examination materials are reviewed in the course of their development with a view to eliminating inappropriate barriers, and careful consideration is given as to whether the means of assessment rely on a skill

or competence that is not properly part of the focus of the assessment but which could exclude candidates with certain disabilities.

#### *Accessibility through the RACE Scheme*

- In addition, the SEC has for many years facilitated access to the certificate examinations by candidates who would have difficulty in accessing the examination or communicating what they know to an examiner because of a physical difficulty (including medical, sensory, behavioural and mental health difficulties as well as physical difficulties); visual and hearing impairments, or a learning difficulty. The category of learning difficulty encompasses a range of conditions such as dyslexia but also general learning difficulties.
- The purpose of the scheme is to allow candidates who have special educational needs that interfere with their capacity to engage with the standard examination arrangements to demonstrate what they know and can do, without compromising the integrity of the assessment. This involves such students being held to the same standard as other candidates with regard to what the examination is intended to measure.
- The RACE scheme has been designed and implemented with care and consideration of this dual purpose, of providing maximal access to the examinations while retaining their integrity. A central tenet of the RACE scheme is to ensure equitable treatment for all candidates and the range of accommodations provided within the scheme has been designed to ensure fairness for all when facilitating candidates in demonstrating their level of achievement.
- In common with similar schemes which operate in other jurisdictions, the focus of the RACE scheme is on the need to remove barriers to accessing the examinations, while retaining the need to assess the same underlying skills and competencies as are assessed for all other candidates, and to apply the same standards of achievement as apply to all other candidates. The range of accommodations provided within the scheme has been designed to ensure fairness for all when facilitating candidates in demonstrating their level of achievement of the objectives of the course concerned.
- Eligibility criteria apply to the various types of accommodations which can be approved under the scheme and accommodations are provided in accordance with the principles and requirements of the scheme.
- The RACE scheme is underpinned by the Report of the Expert Advisory Group (2000) and a Framework of Principles which has been updated to take account of advancements in language and terminology relating to the education of persons with special educational needs.
- The scheme is operated within the context of the annually issued [\*Instructions for Schools\*](#), which is the definitive handbook on RACE policy and operation, and all applications for reasonable accommodations are considered within a published Framework of Principles. Comprehensive information about the scheme is available from the SEC's website at [www.examinations.ie](http://www.examinations.ie). A *Guide for Students* is also provided.

#### **b. Developments in the RACE Scheme**

From the 2016/17 school year, the RACE scheme underwent fundamental reform. The reform focussed on ensuring greater integration of the RACE Scheme with overall Department of Education special educational needs policy; enabling greater access to the scheme by students with learning difficulties and allowing greater autonomy to schools and certainty to students about the examination supports which will be available to them.

The candidate centred changes were informed by engagement with stakeholders which included representatives of students including those with special educational needs such as the Dyslexia Association of Ireland, the Special Needs Parents Association; school management and leadership bodies; Government agencies and statutory bodies including the National Council for Special Education and the National Disability Authority, and with the Department of Education and the National Educational Psychological Service.

Some of the main features of the scheme since the reform are;

- The access arrangements made for the examination should be reflective of the arrangements normally made by the school to support learning for students with an identified need.

- Assessment of eligibility for reasonable accommodations is based on appropriate evidence of need and not on a diagnosis of any specific condition. For some accommodations evidence of need requires school-based testing to be undertaken.
- The application process is school based and the expectation is that applications for reasonable accommodations will be made by schools on behalf of candidates whose special needs have already been identified and who are being provided with appropriate learning interventions as part of a continuum of support in the school.
- Schools have devolved authority to recommend to the SEC the supports, from among those available within the RACE scheme, that should be put in place at Junior Cycle and at Leaving Certificate.
- In general, the SEC will accept the recommendation of the school.
- Accommodations granted at Junior Cycle can be reactivated at Leaving Certificate subject to confirmation by the school.
- This model of decision making gives certainty, from an early stage of a student's post primary education, about the supports that they will have in the State examinations.
- In cases where a candidate or parent are unhappy with the decision to refuse an accommodation, they may access the RACE Independent Appeals Committee (IAC). All members of the IAC are drawn from outside the SEC.
- The Ombudsman or, in the case of students under 18 years of age, the Ombudsman for Children also have a role in reviewing decisions of the SEC in relation to the RACE Scheme.

Since this reform, the RACE Scheme has been subject to a process of ongoing review and improvement by the SEC. Recent enhancements to the scheme include the introduction of deferred examinations for Leaving Certificate candidates who miss their examinations in the main sitting due to close family bereavement, or serious accident, illness or injury. More recently, we have introduced a pilot scheme for the provision of digital examination papers for candidates who are vision impaired.

### **c. Range of accommodations for candidates with Learning Difficulties**

Applications for RACE accommodations can be made on one of four grounds;

1. Physical difficulties
2. Learning difficulties
3. Hearing impairment
4. Vision impairment

The needs of some candidates are such that their application spans more than one of these grounds. As your question relates to learning difficulties I am providing more detailed information about the range of supports available on that ground of application.

An extensive range of accommodations is available to candidates with dyslexia and general learning difficulties<sup>1</sup>, to assist them in accessing the examinations. These include;

- An Individual Reader to read the examination papers, without elaboration or explanation.
- A Reading Assistant to read occasional words or phrases of examination papers without elaboration or explanation.
- An Exam Reading Pen to scan text and convert it to speech which can be listened to using earphones.
- A word processor.
- A recording device to record the candidate's responses.

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<sup>1</sup> Learning difficulty includes conditions such as dyslexia but as noted there is no need for a candidate to have a diagnosis of a specific condition in order to access supports under the RACE scheme.

- A waiver from the assessment of spelling, punctuation and certain elements of grammar in language subjects.
- In exceptional circumstances, access to a scribe if a word processor or recording device would not be an appropriate accommodation.
- Additional time for any candidate who is using a scribe to provide for the time overhead in dictating answers.

The SEC will also consider applications for use of other forms of assistive technology in the examinations as set out in the *Instructions for Schools*.

#### **d. Additional time in the examinations**

Additional time is not an accommodation that can be sanctioned in its own right under the RACE scheme. However, it is available within the RACE scheme in a number of limited circumstances. It should be noted that additional time is not available in the Leaving Certificate examinations in Irish, English, History and Geography as these subjects have additional time built into the time for the examinations for all candidates. In all other subjects, additional time, at a rate of 10 extra minutes per scheduled hour, or part thereof, of each examination paper, may be provided to candidates in the following circumstances:

1. Candidates for whom the use of a scribe has been sanctioned - as there is a time overhead in dictation and otherwise in dealing with a scribe.
2. Candidates who are eligible for RACE supports arising from a visual impairment – such candidates should be under the care of the Visiting Teacher Service.
3. Candidates who meet the eligibility criteria for the use of a mechanical aid (laptop/tablet) but who are unable to make adequate use of these aids under examination conditions.

Any consideration of the question of additional time in which to complete examinations cannot be viewed in isolation from the policy context in which the SEC provides the scheme of reasonable accommodations. In its consideration of additional time, the Expert Advisory Group (2000) recognised the particular challenge in providing time related accommodations as follows;

*“The provision of extra time has the clear potential to allow a candidate to provide additional information in response to questions or to attempt additional questions. On the face of it, then, additional time could confer an unfair advantage on individual candidates. On the other hand, it can be argued that for some candidates, additional time would do no more than enable them to access the test instrument in a way available to all candidates. To ensure that extra time is restricted only to those who would achieve no advantage is well-nigh impossible. It would require intensive screening of each individual applicant by professionals and, even then, given the variation in the nature and severity of special needs, it would be extremely difficult to decide how much time was required by a candidate and whether or not the additional time conferred an advantage in the examination”*

The assignment of time to specific categories of candidates named above stemmed from the Expert Advisory Group review. The challenge in determining the allocation of additional time for candidates with learning difficulties, including dyslexia, was recognised by the Expert Advisory Group and it led to two particular measures being introduced to the scheme in consequence;

1. Additional time of 20 minutes per examination paper was introduced in 2000 for all candidates in the Leaving Certificate subjects, Irish, English, History and Geography. This was introduced to meet the needs of candidates with special educational needs by making the time element of these examinations less critical. It remains the case that the examinations in these subjects are 20 minutes longer than the time they were designed to require.
2. The introduction of a waiver from spelling, grammar and punctuation in the language subjects which was specifically developed to address the time issue for candidates with learning difficulties.

Recent commentary on the issue of additional time in examinations notes that extra time in second-level exams is the norm in most other European countries, and that Ireland is an outlier in this regard. In response, it should be noted the waiver from spelling grammar and punctuation in language subjects, which essentially exists in lieu of additional time, is to our knowledge unique to the Irish examinations system.

It is also suggested an Expert Advisory Group recommended to the SEC to introduce additional time in the examinations. However, the recommendation made by this group in relation to additional time and other accommodations available to students with learning difficulties was not straightforward. This expert Advisory Group made recommendations, as follows, in their published report from 2009;

*“The Advisory Group recommends that the pilot project of 10 additional minutes per hour for some selected papers for all students be discontinued at the earliest possible date. Accommodations of additional time – normally to a maximum of 10 minutes per hour- should continue to be made available for candidates with special educational needs or a specific learning disability. In exceptional situations, the amount of additional time might be as much as 25% extra”*

*“The Advisory Group recommends that serious consideration be given by the State Examinations Commission to the withdrawal of the spelling and grammar waiver in those subjects where it is currently permitted.”*

So, while recommending that additional time might be available for candidates with learning difficulties the Group also recommended the withdrawal of;

- a) additional time which applies to this day to all candidates taking Irish, English, History and Geography and
- b) the spelling and grammar waiver which is the most commonly provided accommodation in the scheme for candidates with learning difficulties.

#### **e. Review of the RACE Scheme**

As noted earlier, the RACE Scheme has been subject to a process of ongoing review and improvement by the Board of Commissioners of the SEC since the fundamental reform of the scheme in the 2016/17 school year. Recent enhancements to the scheme include the introduction of deferred examinations, within the policy context of the scheme, for Leaving Certificate candidates who miss their examinations in the main sitting due to close family bereavement, or serious accident, illness or injury. They also include the introduction of a number of specific examinations initiatives for candidates who are vision impaired including, on a pilot basis, access to digital versions examination papers in the 2023 and 2024 examinations.

It is absolutely acknowledged by the SEC that there is increasing complexity in the special educational landscape and, by extension, the impact on candidates with special educational needs taking the certificate examinations. Some areas of recent focus by commentators and stakeholders in relation to RACE include the provision of supports for candidates who have processing or cognitive issues including those with Autistic Spectrum Disorders; the range of supports appropriate to those who are vision or hearing impaired and the adequacy of additional time within the scheme.

In the context of Senior Cycle Redevelopment, the SEC has commenced work on a comprehensive system wide review of the RACE Scheme which will seek to address all of these issues and many more. A focus of the review will be increasing the use of Assistive Technology to enhance access and integrity and to further support independent learning. The review is being overseen by the Board of Commissioners which has recently agreed the terms of reference for the review. The review will consider all relevant issues and take account of best practice internationally. The composition of the structures that will underpin the review is being finalised. There will be extensive consultation and engagement with as broad a range of stakeholders as possible including young people with special educational needs, their families, and representative organisations.

I trust that this information is of assistance to you.

Yours sincerely

Chris Monahan

Assistant Principal Officer

RACE Review & Deferred Examinations

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