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Learning Disabilities in the Israeli Education System

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This document was prepared at the request of MK Masud Ganaim, and it addresses learning disabilities in the Israeli education system. The document presents the standard definitions for learning disabilities as used in the Israeli education system, reviews the process of identifying and diagnosing learning disabilities in students, and describes the test accommodations provided to students with learning disabilities take tests. Since the Ministry of Education has no data on the total of students who were diagnosed with learning disabilities or on the number of assessments conducted for such disabilities, the document provides data on students who have been granted testing accommodations in the past few years, broken down by population sector and socioeconomic status. The document's conclusion discusses MeLakuyot Lelmida (From Disabilities to Learning), the system-wide program for students with learning disabilities, which was first implemented in the 2017/18 school year as a pilot. If, as planned, the program is implemented within a few years in all junior high schools, it is expected to change the way the education system addresses learning disabilities. We note at the outset that though learning disabilities are sometimes identified in students who also suffer from attention deficit hyperactivity disorder,¹ this document does not address diagnosing or treating ADD.

The document indicates that the rate of students granted testing accommodations differs noticeably between sectors and socioeconomic strata. At the same time, the rate of such students was somewhat higher across all student groups than the rate indicated in the academic literature. With this in mind, the Ministry of Education recently started to gradually implement a system-wide reform to shift the focus in dealing with students who have learning disabilities from testing accommodations to accommodations in teaching and learning methods.

Summary

The document discusses the following points, among others:

- A learning disability is a chronic neurodevelopmental disorder that affects the brain's ability to function efficiently and accurately during cognitive activities. According to the academic literature, 5–15% of the population suffers from learning disabilities to one degree or another.

¹ Committee for Shaping Policy Principles for Treating Students With Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, p. 7 [Hebrew].



- For some time, various professional bodies have warned that the education system—and the general public—place too much emphasis on **granting students testing accommodations and on the assessments that are carried out in order for said accommodations to be granted**. Consequently, many students undergo assessments for learning disabilities despite not suffering from any such disabilities, and at least some of the students taking matriculation exams are deemed eligible for testing accommodations unnecessarily.
- When it comes to learning disabilities, the education system is currently in an interim stage in which it essentially works in parallel with two different definitions for learning disabilities. The first definition was detailed in a Director General Circular, which sets forth the procedures for identifying learning disabilities and addressing them in secondary schools and **emphasizes the gap between a student's academic achievements and the achievements expected of this student based on his or her attributes**. The second definition is included in MeLakuyot Lelmida (From Disabilities to Learning), the system-wide program for students with learning disabilities and attention deficit disorders, which is in place as a pilot project and—according to plan—will be introduced to all junior high schools within a few years. This latter definition goes beyond the achievement gap and **stresses the need to conduct an ongoing, targeted educational intervention in the difficulties exhibited by the student as a prerequisite for defining the learning disability**.
- According to Ministry of Education procedures, the school's educational staff carries out the process of identifying students who might suffer from a learning disability, which is supposed to include a learning function assessment combined with the implementation of educational interventions. If the evaluation is that the student's learning disabilities harm his or her functioning despite spite of the educational interventions, the student is referred for a diagnosis by a dedicated professional.
- The goal of diagnosing learning disabilities is to explain the student's learning difficulties and point to a causal connection between the manifestations of the disability and the cognitive mechanisms that form the foundation of basic learning skills. The diagnosis may focus on learning skills (didactic diagnosis), cognitive-emotional-behavioral issues (psychological diagnosis), or a combination of the two (psycho-didactic diagnosis). According to the Ministry of Education, **didactic diagnosis is performed by a didactic diagnostician or a learning disabilities diagnostician, but the ministry has no formal definition of a diagnostician or a procedure for recognizing diagnosticians**. A



psychological diagnosis is performed by an expert psychologist. The diagnosis must meet the professional standards set out in the guidelines for diagnosticians published by the ministry.

- Schools that provide the highest level of psychological services (A-level service) are visited by an educational psychologist once a week, on average. As part of their standard work, these educational psychologists perform 5–10 diagnoses a year in each school they service. The Ministry of Education does not have data on the number of schools at this service level, and, as such, it also lacks data about the number of diagnoses performed in this manner. Additionally, Educational Psychological Service (EPS) centers, which operate in local authorities, perform diagnoses for secondary school students from underprivileged families (which are funded by the Ministry of Education), diagnoses funded by the local authority, and diagnoses paid for by students' parents. The Ministry of Education does not have any data on diagnoses performed in Educational Psychological Service centers except for those funded by the ministry: some 1,000 diagnoses for secondary school students in Arab education and some 1,000 diagnoses for secondary education students from underprivileged families were performed in each of the last few years at an overall cost of some NIS 4 million a year. There are also diagnosis centers operating in local authorities as well as private centers, but we have no data on the number of diagnoses they conduct. Many diagnoses—whether conducted in Educational Psychological Service centers or by private entities—are paid for by students' parents, but we have no information about the extent of this phenomenon.
- Students with learning disabilities may receive **approval for testing accommodations**. These accommodations allow for the removal of aspects of the test that are not relevant to assessing students' knowledge but which prove an obstacle to expressing this knowledge in light of their learning disability. Accommodations may change the manner of presenting the test, the manner in which students answer the test questions, the duration of the test, or the very nature of the test. Accommodations are divided into three levels, according to the extent of the changes made to the test format and the impact on the essence measured by the test. The decision to grant Level 1 accommodations—those that have no impact on the nature of what the test measures—is usually made by a school committee and, in some cases, does not require didactic or psycho-didactic diagnosis. Level 2 and 3 accommodations may only be granted following a decision by the regional accommodations committee.



- In 2016, some 44,000 students who took the matriculation exam (comprising 45% of all the examinees) were eligible for testing accommodations. The percentage of students granted testing accommodations was higher in the Hebrew education system (including the ultra-Orthodox education track)—50%—and especially in the Hebrew non-religious State education system—53%. By contrast, examinees in the Arab education system were granted accommodations at a notably lower rate (29%), and the rate was even lower (23%) in the ultra-Orthodox education track.
- Nearly a quarter of the students throughout the entire education system who were granted testing accommodations were granted Level 3 accommodations—those that change the essence of the test and are therefore meant to be granted only in special cases. In the Arab education system, 10% of students granted accommodations are eligible for Level 3 accommodations (the highest level), as compared to 26% of those students in the Hebrew education system granted accommodations.
- The rate of students taking matriculation exams who were granted accommodations (45%) was ten percentage points higher in 2016 than five years previously, in 2011. This upward trend is not new. The percentage of students who were granted accommodations in both the Hebrew and Arab education systems has increased in the past few years, although more prominently in Arab education.
- Differences also exist between students from different socioeconomic backgrounds as regards the granting of accommodations. **As a rule, the percentage of students taking the matriculation exams who are granted accommodations increases the higher the socioeconomic cluster of the locality where the students live.**
- Though the rapid growth in the rate of accommodation recipients in the Arab sector has helped reduce the gap in the rate of accommodation recipients between the different sectors, these gaps are still prominent, and they parallel the gaps that were found between socioeconomic strata. However, **given the high percentage of students from all population groups who have been granted accommodations and the gap between this rate and the rate of students who—according to the data in the professional literature—are expected to need accommodations in order to deal with learning disabilities (3–15% of students, according to the Ministry of Education), there does not seem to be a problem of under-diagnosis in certain student groups, at least according to the macro-level data available to us.** In 2014, a professional committee from the Ministry of Education came to the conclusion that most of the gaps in the rate of accommodation recipients between different population groups can be attributed to an



inclination to label students' functional difficulties—which do not receive proper treatment and may not, in fact, stem from learning disabilities—as "learning disabilities." **However, since testing accommodations—at least some of them—do grant an advantage to those who receive them over those who do not, they do privilege students of certain population groups.**

- **In light of what the Ministry of Education has described as an overuse of testing accommodations, the ministry has begun gradually implementing a system-wide reform for identifying and treat students with learning disabilities and ADHD.** The reform was first implemented as a pilot in 76 junior high schools in 15 local authorities during the 2017/18 school year; it is expected to expand in the 2018/19 school year to another 100 junior high schools in 23 authorities. In the 2018/19 school year, the pilot will implemented in authorities in socioeconomic clusters 1–8: ten of which are Arab authorities (four of which began the program in 2017/18) and the rest are Jewish authorities. According to the Ministry of Education's plan, the reform will be implemented in all the junior high schools in Israel within 5–6 years at a cost of NIS 75 million.
- **The main change the reform seeks to inculcate is a shift of the focus of treating students with learning disabilities from testing accommodations to teaching and learning accommodations.** For this purpose, the school must promote continuous, processive, and documented work with students with difficulties who are identified through tests at the beginning of 7th grade. The school must construct intervention plans to advance all struggling students and follow up regularly on their progress while examining the efficacy of the interventions. Only in 9th grade—after interventions and reviews of the need for testing accommodations among students who continue to struggle—can a decision be made to refer the student for diagnosis of a learning disability, after which a decision can be made regarding the student's eligibility for testing accommodations. This plan is based on the assumption that with early identification and proper intervention, most struggling students will acquire tools and skills that would allow them to circumvent their difficulties without the need for testing accommodations. The diagnosis of learning disabilities will be partly or fully funded by the Ministry of Education and performed in dedicated centers that will be established in the Educational Psychological Service offices. **Under the reform, the ministry will only recognize recommendations for accommodations in matriculation exams from**



diagnoses performed in centers under its supervision, although it will continue to recognize private diagnoses for other purposes and age groups.

1. Introduction

A learning disability is a neurodevelopmental disorder that affects the brain's ability to function efficiently and accurately during cognitive activities, such as perceiving and processing verbal and nonverbal information. The disability compromises academic skills such as reading, reading comprehension, written expression, spelling, calculation skills and mathematical reasoning. Learning disabilities are common in the population; the accepted figure in the academic literature is 5–15% of the population who have learning disabilities, to varying degrees.²

Numerous individuals have warned for some time that many students are diagnosed with learning disabilities despite not suffering from any, and at least some of the examinees in matriculation exams are deemed eligible for testing accommodations for no reason. In 2012, the State Comptroller pointed to a considerable increase since 2006 in the number of examinees who had been granted testing accommodations for learning disabilities and suggested that some—perhaps a significant portion—of the accommodations granted in the general Jewish track and the Jewish religious track were approved for students who do not suffer from learning disabilities.³ In late 2013, the Ministry of Education formed a committee to examine the policy principles for treating students with learning disabilities (hereinafter: the Margalit Committee). In the wake of the continued increase in the number of accommodations and further to developments in scientific knowledge and changes in professional perceptions, the committee found that **the Ministry of Education tends to include students' functional difficulties—which do not necessarily stem from learning disabilities and which are not properly treated—under the umbrella of "learning disabilities."** The committee concluded that the education system and public perception both focus on testing accommodations and on the evaluations performed to receive them.⁴

² Committee for Shaping Policy Principles for Treating Students With Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, pp. 9–10 [Hebrew].

³ State Comptroller, Annual Report 63c for 2012 and the accounts of Fiscal Year 2011, [Follow-up Findings: Accommodations for Students with Learning Disabilities on Matriculation Exams](#), 8 May 2013, p. 1135 [Hebrew].

⁴ Committee for Shaping Policy Principles for Treating Students With Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, pp. 6–7 [Hebrew].



Against this backdrop, during the 2017/18 school year, the Ministry of Education started to gradually implement a system-wide program called "MeLakuyot LeImida" to reform the diagnosis of learning disabilities and ADHD among students. This program, which seeks to shift the focus of treating students with learning disabilities from testing accommodations to teaching and learning accommodations, is discussed in greater detail in the final section of this document. **Currently**, the education system is in an interim period during which the reform has only been partially implemented, and **it is essentially operating using two different definitions for learning disabilities:**

In a Director General's Circular published by the Ministry of Education in 2013,⁵ which set out the valid procedures for diagnosing and treating students with learning disabilities in secondary education, the definition of a learning disability is based on the one found in the fourth edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM-IV) from 1994.⁶ According to this definition, **students are diagnosed with a learning disability when learning difficulties cause a significant, persistent gap between their academic achievements and the achievements expected from someone of their age, years of schooling, and level of intelligence as measured using objective IQ tests.**

The development of clinical and academic knowledge regarding learning disabilities and attention deficit disorders in the past two decades, together with the most updated academic knowledge on neuroscience, has led to changes in the perception of the process of locating, identifying, diagnosing, and intervening with learning disabilities and attention deficit disorders.⁷ With this in mind, **the system-wide program for treating students with learning disabilities, MeLakuyot LeImida**—which, as mentioned above, was first implemented as a pilot in the 2017/18 school year⁸—defines a learning disability using the definition in DSM 5 from 2013.⁹ In this program, **a learning disability is termed a "Specific**

⁵ Ministry of Education, [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003 [Hebrew].

⁶ American Psychiatric Association, Diagnostic and Statistical Manual of Mental Disorders, 4th ed., 1994.

The manual, intended to diagnose and categorize mental illness according to their symptoms, is published by the American Psychiatric Association. The most updated edition is the 5th edition published in 2013, which replaced the revised 4th edition published in 2000.

⁷ Committee for Shaping Policy Principles for Treating Students With Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, Page 10 [Hebrew].

⁸ Ministry of Education, Psychological Counseling Service, [MeLakuyot LeImida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date [Hebrew].

⁹ American Psychiatric Association, Diagnostic and Statistical Manual of Mental Disorders, 5th ed., 2013.



Learning Disorder (SLD),"¹⁰ a phrase that stresses the need to conduct an educational intervention as a prerequisite for defining a learning disorder. The learning disorder may make it harder to acquire basic academic skills (reading, writing, and arithmetic) and is expressed only when students struggle to meet the educational requirements expected from them based on age and lack the ability to implement methods of compensation to express their knowledge and achievements suited to their abilities.¹¹

Diagnosis of a specific learning disorder requires four conditions:¹²

- Persistent difficulties (at least six months) with using academic skills and learning, **despite the provision targeting intervention for dealing with difficulties.**¹³
- Academic skills influenced by the disorder are clearly and measurably below what is expected based on the individual's chronological age, which causes a significant disorder in study performance and other areas of life, as indicated in standardized achievement tests.
- Learning difficulties began during the school-age years, but the full extent of the difficulty might be revealed only at a later stage, as the demand for academic skills rises.
- Learning difficulties are not accounted for by an intellectual disability, general developmental delay, hearing or vision problems, mental or other neurological disorders, psychosocial distress, a lack of proficiency in the language of instruction, or inadequate educational instruction.¹⁴

The diagnostician is required to define the level of the disability's severity on a three-tier scale. The severity level is determined by the level of the student's ability to compensate for

¹⁰ The use of "learning disorder" instead of "learning disability" was first presented DSM-IV, which shifts the focus of the student's suffering from a disability—a significant and persistent difficulty that exists within the person—to a disorder, a condition that makes it harder for a person to function. Ehrenreich, 2013, in Ministry of Education, Psychological Counseling Service, [MeLakuyot Lelmida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, page 11.

¹¹ Ibid, p. 12.

¹² Ibid.

¹³ The report by the Margalit Committee—a professional committee established by the Ministry of Education to provide recommendations for shaping policy principles for treating students with learning disabilities, which it submitted in 2014—states that these difficulties include inaccuracy or slowness when reading words, difficulty with reading comprehension, difficulty spelling, difficulty with written expression, difficulty with grasping numerical concepts, numerical facts and arithmetic and difficulties with mathematical reasoning. Committee for Shaping Policy Principles for Treating Students with Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, p. 9.

¹⁴ The Margalit Committee Report clarifies that according to the new definition, the existence of a gap between IQ and educational achievements is not a prerequisite for determination of a learning disability, but it does rule out an intellectual disability. Ibid, p. 6.



the difficulty and by the necessary intensity level of the intervention. The severity level defined for the disability dictates the resources allocated to the student.

Unlike with previous definitions of learning disabilities, the contemporary definition used by the program distinguishes between a learning difficulty and a learning disability. **According to the new definition, a student cannot be said to have a learning disability without also being assigned an intervention. This change has significant repercussions on the process that the educational staff uses to work with students who have been recognized as struggling. The first phase of the treatment process consists of an intervention that focuses on difficulties. Only after no progress has been observed, the student will be referred for a diagnosis.** Therefore, the definition also requires following up on the teaching and learning processes that involve the student; it also demands close cooperation between the diagnostician and the school, because the diagnostician must examine the attempted intervention methods in order to provide an accurate diagnosis.¹⁵

2. Identifying and Diagnosing Students with Learning Disabilities

The Ministry of Education unit in charge of learning disabilities is the Department of Learning Disabilities and ADD in the Psychological Counseling Service (hereinafter: PCS).

For all age groups, in schools that provide regular psychological services (i.e., schools that have been assigned the highest of the three service levels—A-level service—where an educational psychologist arrives once a week, on average), the educational psychologist performs diagnoses as part of his or her regular work, as necessary, and in accordance with his or her workload. **The Ministry of Education estimates that the educational psychologist performs 5–10 diagnoses a year in each A-level school (elementary and junior high) that he or she services, but it does not have information on the number of schools that have been assigned this service level, as that is set by the local authority.**¹⁶

The process of identifying and diagnosing secondary school students with learning disabilities is presented in the 2003 [Director-General Circular 5764/4\(b\): 25-4.3 Testing](#)

¹⁵ Ibid, pp. 12–13.

¹⁶ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018; Hava Friedman, Director of the Psychology Department, Psychological Counseling Service, Ministry of Education, email of 1 July 2018. The educational institutions' level of service (A, B or C) is determined by each local authority based on the supply of personnel at the EPS center; the ratio between the number of psychologist positions in the EPS center and the number of students and educational institutions in the authority; and the needs of the various educational institutions: kindergartens and schools, both regular and special education. Hava Friedman, Director of the Psychology Department, Psychological Counseling Service, Ministry of Education, email of 1 July 2018.



[Accommodations for Internal and External Examinees with Learning Disabilities](#). According to the model presented in the circular, **the first phase—identifying students who might have learning disabilities—is performed at school, after which a diagnosis is performed by a dedicated diagnostician, if necessary.** According to the model, the teacher plays a key role in finding, identifying, and assessing difficulties among his or her students; drafting and executing an intervention plan within the educational framework; and following up on the student's progress. **Following is the work model according to the Director-General Circular for identifying and diagnosing students with learning disabilities.**

2.1. Identify Learning Difficulties and Assessing Study Performance¹⁷

- The process begins by **identifying learning difficulties** that are expressed first and foremost in the ineffective execution of one or more basic academic skills: reading, writing (penmanship, spelling, and expression), and arithmetic. The teacher can identify these difficulties by using diagnostic tests designed for this purpose as well as by observing the student in class and by examining and analyzing his or her work (assignments and tests).
- After identifying the difficulties, the teacher (homeroom teacher or subject teacher) must perform a learning function assessment, which consists of reviewing the student's achievements in reading, writing, and arithmetic and examining learning patterns across different subjects such as learning strategies, organizational skills, and execution of learning assignments. **The evaluation process is supposed to show the extent of the gap between the student's performance and what is expected of him or her based on age and educational stage.**
- After evaluating the student's difficulties, **an educational intervention program** will be created, which is tailored to the student's specific difficulties in different content areas and which aims to advance his or her learning skills and achievements.
- The intervention program will be implemented with support from an multidisciplinary team, which usually includes the homeroom teacher, school counselor, educational performance assessor, school psychologist (if one exists), and subject teachers as necessary. **If the team finds that the student has not made**

¹⁷ Unless stated otherwise, the information in this section is taken from Ministry of Education, [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, Sections 2.1.3–2.1.7.



sufficient progress (study performance has not improved, or the progress that has been made has not narrowed the learning gap with the rest of the class) and is deemed to be functioning at a level that does not match his or her capabilities due to learning disabilities, he or she will be referred for a diagnosis.¹⁸

2.2. Diagnosing Learning Disabilities

The purpose of diagnosing learning disabilities is to explain the student's learning difficulties and point to a causal relationship between aspects of the disability and cognitive mechanisms that underpin basic learning skills (such as processes related to cognitive processing in spoken and written language and those related to visual, depth, and auditory perception). In addition to the focus on the nature of the learning disability and related mechanisms, the diagnosis must address the learner's educational background and the teaching strategies and methods to which he or she is exposed; developmental, emotional and social aspects such as motivation and diligence (rather than avoidance); and the relationship between all the various aspects.¹⁹

There are three types of diagnosis:²⁰

- **Didactic diagnosis**—meant for students whose failures in school can be assumed—based on documented educational intervention over time and familiarity with them and their performance—to stem from primary learning disabilities, without evidence of any other difficulties. Didactic diagnosis maps the student's learning difficulties and skills, outlines the student's behavior in the areas of learning, identifies the student's learning strategies, and examines the cognitive mechanisms that underpin his or her study of basic academic skills. Didactic diagnosis is the foundation for constructing an educational plan for the student or improving his or her current plan.

¹⁸ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018; Ministry of Education, [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, sec. 2.2.1.

¹⁹ Ministry of Education, [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, sec. 2.2.1.

²⁰ Ibid, sec. 2.2.2. If the student is suspected of having a **medical or paramedical disorders**, he or she is referred to an additional professional diagnostician: a psychiatrist or neurologist for suspected neurological spectrum disorders—ADD, Tourette syndrome; a psychiatrist for suspected psychiatric spectrum disorders—Asperger's syndrome; a speech therapist for a suspected language disorder; an occupational therapist's diagnosis for suspected motor disorders; an ophthalmologist for suspected eye disorders; and an audiological test for suspected hearing disorders.

For detailed information on the process and components of diagnosis see: Sec. 2.2.3 of [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003; Ministry of Education, Department of Learning Disabilities and ADD, Diagnostic Data Sheet, no date; Ministry of Education, Psychology Department, [Instructions for Writing a Psychological Opinion](#), May 2014.



- **Psychological diagnosis**—used to assess students' strengths and weaknesses in the intellectual, cognitive, emotional, and behavioral fields, which includes the interaction of these fields and their influence on the student's academic performance and other functions. The purpose of psychological diagnosis is to construct an expanded program for addressing the various sources of the difficulty.
- **Combined diagnosis (psycho-didactic)**—composed of both didactic and psychological diagnoses. The student is referred for a combined diagnosis when his or her difficulties stem from a variety of different factors and when the learning failures are particularly severe. The goal of combined diagnosis is to assess the abilities and difficulties in the personal, emotional, behavioral, and social fields as well as the intellectual and cognitive functions at the foundation of learning, and to examine their impact on the student's academic performance.

After the diagnosis is completed, an opinion is drafted, which includes, among other things, a description of the findings from the diagnosis as well as a coherent analysis. Thus, the findings are not left to speak for themselves but, rather, an explanation is provided to reconcile the student's learning difficulties with the cognitive findings and his or her intellectual and emotional abilities, if assessed. Furthermore, the opinion includes a conclusion as well as therapeutic and educational recommendations within the educational framework and outside of it, including recommendations for special testing methods, if necessary.²¹

2.3. Diagnoses of Learning Disabilities

Diagnoses of learning disabilities are performed at Educational Psychological Service (EPS) centers, which operate in local authorities in accordance with the policy outlined by the Ministry of Education and which are partially funded by the ministry,²² or on a private basis.

²¹ [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, sec. 2.2.3.

²² The policy regarding the operation of EPS centers in local authorities is determined by the Education Ministry's Psychological Counseling Service, in collaboration and cooperation with the Federation of Local Authorities. The Ministry of Education funds some two-thirds of the psychologist positions it allots to the EPS. Director General's Circular 5770/8(a), 3.7–61: Outline of the Educational Psychology Service, 7 April 2010. According to the Ministry of Education website, there are currently some 270 EPS centers operating in 250 local authorities. Ministry of Education, Psychological Counseling Service website, Educational Psychology Services—Stations and Information List, updated 17 February 2018, accessed 1 August 2018.



As mentioned above, in schools for all age groups where regular psychological services are provided (A-level service), the educational psychologist performs 5–10 diagnoses a year in each school, as part of his or her regular work. We also noted that the Ministry of Education does not have information on the number of schools that have been assigned this service level, as that is determined by the local authorities.²³

In addition, the EPS center performs Education Ministry–funded diagnoses for secondary school students from underprivileged families (more on Ministry of Education diagnosis grants below), diagnoses funded by the local authority, and diagnoses paid for by students' parents. **The cost of didactic diagnosis at an EPS center is some NIS 1,300, and the cost of psycho-didactic diagnosis at an EPS center is some NIS 2,500.**²⁴

Alongside the EPS centers, there are diagnosis centers operated by local authorities and private centers,²⁵ but we unfortunately have no data on the number of diagnoses they perform.

The Ministry of Education was asked to provide data on the number of diagnoses carried out for students, the number of diagnoses performed in EPS centers, and the number of diagnoses funded by the Ministry of Education. It was asked to provide this data broken down by diagnosis type, educational stage, and sector (i.e., Hebrew or Arab education). **The Ministry of Education stated that, aside from the diagnoses it funds (data on which will be presented below), it has no data on diagnoses performed within EPS centers or outside of them. It further stated that it has begun efforts to establish a computerized database regarding diagnoses performed in EPS centers, which would allow for the collection of data on the local, regional, and national levels.**²⁶ In the absence of data on the number and breakdown of diagnoses, the document will present data on students who have been granted testing accommodations; because these are granted, in part, after a diagnosis, they can provide an indication as to the scope of the phenomenon.

²³ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018; Hava Friedman, Psychology Department Director, Educational Psychological Service, Ministry of Education, email of 1 July 2018.

²⁴ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018.

²⁵ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letters of 13 and 24 June 2018.

²⁶ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letters of 13 and 24 June 2018.



2.3.1. Diagnoses Recognized by Education System

According to the Director General's Circular, a didactic diagnosis may be performed by anyone certified to do so. The response by the Education Ministry to our query noted that didactic diagnoses are performed by didactic diagnosticians or learning disability diagnosticians but that the ministry has no formal definition for diagnosticians or a procedure for recognizing diagnosticians.²⁷ Psychological diagnoses are performed by specialist psychologists. Combined diagnoses may be performed by specialist psychologists trained to perform didactic diagnoses, or as two separate diagnoses (didactic and psychological), provided the conclusions, differential diagnosis, and recommendations derived from both diagnoses are summarized in an opinion by a specialist psychologist. The Ministry of Education stated that whether diagnoses are performed at an EPS center—which operates in local authorities on behalf of the Ministry of Education and under its supervision—or by private entities,²⁸ they must meet the standards specified in the instructions for diagnosticians published on the PCS website.²⁹

In contrast to the situation described above regarding the certification of diagnosticians of students in the education system, according to the [Law on Rights of Students with Learning Disabilities at Post-Secondary School Institutions, 5768-2008](#) (which regulated accommodations for students with learning disabilities in institutions for post-secondary education), eligibility for testing accommodations requires a diagnosis of a learning disability by a recognized diagnostician. A certificate of recognition will only be awarded to one of the following: specialist psychologist; specialist doctor in one of the following fields: neurology, psychiatry, pediatric neurology, and child and adolescent psychiatry; a doctor specializing in pediatrics with three years of experience in child development; someone with a master's degree in occupational therapy or communication disorders; someone with a master's degree in another field who was deemed to have the appropriate training to be recognized as a diagnostician.³⁰

²⁷ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letters of 13 and 24 June 2018.

²⁸ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018.

²⁹ Ministry of Education, Department of Learning Disabilities and ADD, [Diagnostic Data Sheet](#), no date; Ministry of Education, Psychology Department, [Instructions for Writing a Psychological Opinion](#), May 2014.

³⁰ Sections 3 and 6 of the [Rights of Students with Learning Disabilities in Secondary Education Institutions Law](#), 5768-2008. In the Rights of Students with Learning Disabilities in Regular Education Bill, 5776-2015 (P/20/2210) sponsored by MK Yakov Margi and others,



It should be noted that the tender for operating a database of experts in diagnosing learning disabilities for the PCS (for diagnoses performed in EPS centers) required didactic diagnosticians to have either a master's degree in treating learning disabilities or a bachelor's degree and didactic diagnostician certificate (a 500-hour program, at least), four years of teaching experience in the education system, and experience diagnosing at least 30 students within the education system. ³¹ Although the September deadline for the 2017, the procurement procedure has yet to be concluded. ³²

2.4. Funding for Diagnoses

It appears that many diagnoses, whether they are performed by EPS center or by private entities, are paid for by students' parents, but we have no data on the extent of this phenomenon. The following section presents partial information on sources of funding for diagnoses other than the students' parents.

2.4.1. Diagnoses Funded by Ministry of Education

As noted above, the Ministry of Education has no data on the number of diagnoses performed annually—using ministry funding—by educational psychologists in elementary and junior high schools where regular psychological services is provided (schools assigned A-level service). ³³ Besides funding these diagnoses, **the Ministry of Education allocates some 1,000 grants to fund diagnoses for students in secondary education who come from underprivileged families across all the sectors of society.** Through this framework, a budget is allocated annually for grants to provide fully funded diagnoses to students in grades 8–10. **In general, the grants are intended for psycho-didactic diagnoses.** Sometimes, if the

which was submitted to the Knesset prior to a preliminary vote, the sponsors seek, among other things, to define a recognized diagnostician in a manner similar to the existing definition in the Rights of Students with Learning Disabilities in Secondary Education Institutions Law, 5768-2008. Identical bills were submitted to the 15th, 16th, 17th, and 18th Knessets.

³¹ Ministry of Education, Department of Procurement, Tenders and Contracts, [Variable Scope Tender 7.2017/21: Provision of Specialized Services for Various PSC \(Psychological Counseling Service\) Activities](#), 20 July 2017, Page 13.

³² Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, phone call of 20 June 2018

³³ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018; Hava Friedman, Psychology Department Director, Educational Psychological Service, Ministry of Education, email of 1 July 2018.



student has already undergone a didactic or psychological diagnosis, the funding just covers the missing diagnosis.³⁴

Grants are allocated to Ministry of Education districts according to an index based on the number of students in each district. The allocation of grants to students is approved by a district-level committee, which discusses requests submitted by the schools.³⁵ Besides the criteria indicating the need for the diagnosis (for example, the extent of the student's educational gaps and the inefficiency of the educational interventions that have been implemented), **grant eligibility is assessed using an economic index that measures the income per minor in the student's family** (i.e., the family's net income divided by the number of persons below 18). Students whose family income is up to NIS 2,000 per person are assigned level-one eligibility, while students whose family income is NIS 2,000–2,500 per person are assigned level-two eligibility. The committee first allocates grants to students deemed eligible for a level-one grant, and if any grants remain, they are allocated to students eligible for a level-two grant.³⁶

Besides the diagnosis grants available to all students in the education system, **under the five-year plan for Arab education,³⁷ diagnosis grants are allocated strictly for this sector. In the past three years, some 1,000 grants were allocated annually.** The grants are intended for students in grades 9 and 10 who need accommodations and were not diagnosed at an earlier age. The grants are allocated to the districts, which allocate them to schools based on the size of the relevant population. Diagnoses are performed by psychologists approved by the EPS inspectorate. The five-year plan ended with the 2017–18 school year, but the Ministry of Education stated that a new plan will begin with the next school year and that it, too, will cover diagnoses to an extent to be determined by the approved budget. **We note that the cost of a diagnosis under the five-year plan (approximately NIS 1,400) is considerably lower than the cost of a diagnosis performed in EPS centers (where, as noted,**

³⁴ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018.

³⁵ The committee is comprised of a general superintendent who represents the district director or anyone on their behalf (committee chairman), a district psychologist or their representative, a counseling supervisor or their representative and a learning disabilities counselor at the district.

³⁶ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018 and phone call of 20 June 2018; Ministry of Education, Department of Learning Disabilities and Attention Deficit Disorders, [Procedure for Approving Grants for Diagnosing Underprivileged Students—5777, June 2017](#), updated 13 January 2018, last entry: 19 June 2018; [Criteria for Approval of Diagnosis Grant Request](#) (Appendix 2 to the Procedure for Approving Grants for Diagnosing Underprivileged Students—5777, June 2017), no date.

³⁷ Ministry of Education, [Five-Year Plan in Arab Sector for 2013–2018, 5773–5778](#), no date.



a psycho-didactic diagnosis costs some NIS 2,500).³⁸ We have found no explanation for this cost gap.

The following table presents the number and cost of grants allocated in the past four years:

Table 1: Number of Allocated Grants, Grant Budget and Budget Utilization, 2015-2018³⁹

Year	2015	2016	2017	2018
Number of system-wide grants	1,000	1,000	1,000	1,000
Number of grants for Arab education	600	1,000	1,151	1,000
Total budget allocation	NIS 3,516,550	NIS 4,090,200	NIS 4,306,828	NIS 4,090,200

The Ministry of Education stated that the cost of a diagnosis is NIS 1,434–2,656. The price range stems from the varying costs of different types of diagnoses and from the fact that the cost of a diagnosis under the five-year plan is lower than the cost of diagnoses in EPS centers.⁴⁰

During a discussion in the Knesset Committee for the Rights of the Child in February 2018, the Director of the Department of Learning Disabilities and Attention Deficit Disorders noted that the ministry does not utilize all of the diagnosis grants it budgets for, as there is no real need to do so.⁴¹ However, the Ministry of Education reported in the response to our query that the grant budget had been fully utilized in 2015 and 2016, the 2017 budget for the five-year plan for Arab education was fully utilized, and that 92% of the system-wide 2017 grant budget had been utilized by 1 June 2018. According to the ministry's response, there are several reasons for the delay in utilizing the grant budget. In some cases, a great deal of time

³⁸ Irit Biran, Deputy Director of Pedagogy Administration, Ministry of Education, letter of 27 June 2018; Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018.

³⁹ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018.

⁴⁰ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018, phone call of 20 June 2018.

⁴¹ The Knesset Committee for the Rights of the Child, Record 200, [Diagnosing Learning Disabilities in Children from Underprivileged Families](#), 20th Knesset, 6 February 2018, pp. 16–17.



passes between the date application for a diagnosis grant is submitted and the date the budget for it is approved, and during this time, some schools find other budgetary sources to fund the diagnosis, which obviates the need for the budget approval. In other cases, the student and his or her family fail to cooperate and the student fails to show up to the diagnosis on the determined date (however, the funding is returned for allocation to another student only after several failures to show up for the diagnosis). The Ministry of Education stated that the budget is fully utilized every year and in cases of partial utilization, the budget is rolled over to the following year.⁴²

In the wake of the discussion by the Committee for the Rights of the Child on diagnosing learning disabilities in children from underprivileged families, in which it was reported that the grant budget is not fully utilized, as mentioned above, the committee concluded that the failure to fully utilize the grant budget stems from a lack of information regarding these grants. Consequently, the committee called on the Minister of Education to act to inform parents and educational staffs of the existence of these grants and to encourage them to use them.⁴³ In the response by the Minister of Education to the committee's conclusion, he stated that the Department of Learning Disabilities and Attention Deficit Disorders released a circular reminding principals, superintendents, and school counselors of the existence of diagnosis grants and calling on them to submit grant applications for students who need them.⁴⁴

2.4.2. Additional Funding Sources for Diagnoses

The Ministry of Education reported that there are other sources of public funding for diagnosing students with learning disabilities, including government programs such as the National Program for Children and Youth at Risk and Derech Hadasha (a Ministry of Education program that advances the inclusion of Ethiopian students in Israeli society and the education system), as well as local authorities' sources of independent funding and

⁴² Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018.

⁴³ The Committee for the Rights of the Child, [Committee Conclusions on Diagnosing Learning Disabilities in Children from Underprivileged Families](#), 20th Knesset, 11 February 2018.

⁴⁴ Naftali Bennett, Minister of Education, [Comments on the Committee Conclusions on Diagnosing Learning Disabilities in Children from Underprivileged Families](#), 25 February 2018.



donations they raise. The ministry's response to our query noted that some localities established diagnosis centers using their own funding.⁴⁵

Moreover, the health funds' additional health services (AHS, complementary insurance) offer partial funding for diagnosing learning disabilities, with a deductible of NIS 550–1,014 for didactic diagnoses and NIS 950–1,550 for psycho-didactic diagnoses (the sum of the deductible depends varies by health fund and the level of patients' insurance).⁴⁶

2.4.3. Proposals to Increase State Funding for Diagnoses

The Committee for the War against Poverty in Israel (Elalouf Committee) recommended that the State consider participating in funding the diagnoses of learning disabilities for children who live under the poverty line and who need it. The committee estimated a need for 4,000–6,000 diagnoses in every age cohort (10–15% of the approximately 40,000 children at each age who live in poverty). According to the committee, the current cost of funding the diagnoses would be NIS 10–15 million a year (at NIS 2,500 per diagnosis), after a one-time expense of NIS 100–150 million to diagnose children currently studying in the relevant classes (grades 2–11). As mentioned above, in 2018, the Ministry of Education allocated some NIS 4.1 million to fund 2,000 diagnoses.⁴⁷

Further to the committee's recommendation, a bill was submitted in the Twentieth Knesset to set forth criteria whereby children from underprivileged families would be eligible for a free diagnosis of learning disabilities.⁴⁸ In December 2015, the Ministerial Committee for Legislation decided that the Government would support the bill in its preliminary reading and that the bill would be advanced subject to budgetary coordination with the Ministry of

⁴⁵ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letters of 13 and 24 June 2018.

⁴⁶ Clalit Health Services, [Didactic and Psycho-Didactic Diagnoses](#), accessed 19 June 2018; Leumit Health Services, [Didactic Diagnosis](#), accessed 19 June 2018; Meuhedet Health Services, [Meuhedet C Regulations: Supplementary Health Insurance Plan](#), November 2017; Maccabi Healthcare Services, [Didactic or Psycho-Didactic Diagnosis from Age 6 and Above—Terms of Eligibility](#), updated 1 April 2018, accessed 19 June 2018.

⁴⁷ The Committee for the War against Poverty, [Committee Report, Part 1: Plenary Report](#), 23 June 2014, p. 33.

⁴⁸ MK Yoav Ben Tzur and a group of Knesset members, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill, 5775-2015](#) (P/20/1252). Two identical bills and one that was largely similar were submitted to the Knesset before a preliminary vote: MK Orly Levy Abekasis, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill, 5776-2016](#) (P/20/2923); MK Orly Levy Abekasis and MK Yakov Margi, [Psycho-Didactic Diagnosis for Needy Children Bill, 5776-2016](#) (P/19/2924); MK Masud Ganaim, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill, 5778-2018](#) (P/20/5281). Another bill seeks to regularize the rights of students with learning disabilities, while seeking to determine that learning disability diagnoses will be given for free or payment will be set according to socioeconomic standards determined by the Minister of Education. MK Yakov Margi and a group of Knesset members, [Bill Proposal on the Rights of Students with Learning Disabilities in Regular Education, 5776-2015](#) (P/20/2210).



Finance and the Ministry of Education and in coordination with the Ministry of Economy and Industry and the Ministry of Social Affairs and Social Services.⁴⁹ The bill was thereafter approved in its preliminary reading,⁵⁰ but it has not been advanced since then.

At the request of the Committee for the Rights of the Child, the Knesset Research and Information Center conducted a cost estimate of implementing the bill. According to this estimate,⁵¹ the bill would cost some NIS 24 million a year to implement, after a one-time expense that could reach up to NIS 257 million to diagnose students already in the system (assuming all eligible students realize their eligibility.)⁵² The Ministry of Finance, which also performed a cost estimate of implementing the bill, estimated that about half of students eligible for diagnosis had been diagnosed before or did not realize their eligibility for diagnosis for various reasons, and it therefore estimated the onetime cost of implementing the law at some NIS 147 million and the ongoing cost at some NIS 25 million a year.⁵³

3. Testing Accommodations for Examinees with Learning Disabilities⁵⁴

As stated in the Director General's Circular, at the conclusion of the diagnosis, the diagnostician must summarize his or her opinion on the student's learning disabilities and recommend therapeutic and educational methods of helping the student address these disabilities—including testing accommodations, if necessary.⁵⁵

Testing accommodations allow students with learning disabilities to sidestep areas of difficulty by removing aspects of the test that are not relevant to assessing students'

⁴⁹ Resolution 907 of the 34th Government, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill, 5775-2015 by MK Yoav Ben Tzur et al., \(P/1252\)](#), 31 December 2015.

⁵⁰ 20th Knesset, *Knesset Record*, [Session 77](#), 6 December 2015, pp. 93-98.

⁵¹ Estimate based on the Ministry of Education assessment that 20% of the students should be referred for diagnoses—of whom about half will be identified as suffering from learning disabilities—and data from the National Insurance Institute, according to which 31% of children were living under the poverty line in 2014.

⁵² Anat Yaron, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill—Cost Estimate](#), Knesset Research and Information Center, 8 March 2016.

⁵³ Noa Heymann, Education Coordinator, Ministry of Finance Budgets Department, 10 January 2016, in Anat Yaron, [Eligibility for Diagnosis of Learning Disabilities in Children from Underprivileged Families Bill—Cost Estimate](#), Knesset Research and Information Center, 8 March 2016.

⁵⁴ Unless otherwise noted, the information in this section is taken from: Ministry of Education, [Director-General Circular 5764/4\(b\): 25-4.3 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, Sections 3.1-3.4; [Testing Accommodation for Students with Learning Disabilities and ADD testing in School Year 5779 \(follow-up and submission of files to the committee in 5778\)](#), 18 October 2017. It should be noted that the Ministry of Education recently initiated a comparative review on testing accommodation policies in different countries. See: Malka Margalit, [Testing Accommodation Policies for Children and Youths with Learning Disabilities](#): US: New York and California; Australia; New Zealand; England; Scotland; and Ontario, Canada, review commissioned by the Office of the Chief Scientist and the Department of Learning Disabilities and ADD at the Ministry of Education, 7 May 2018.

⁵⁵ [Director General Circular 5764/4\(b\): 4.3-25 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, Section 2.2.3.



knowledge but that instead serve as obstacles to expressing this knowledge due to a learning disability. This allows students with learning disabilities to give the knowledge they have acquired suitable expression on an equitable basis. Accommodations are not given to students with learning disabilities to grant them an advantage over students who do not receive accommodations.

Testing accommodations take several forms: **changes to how the test is presented to students**—such as reading questions out loud and larger fonts on the exam—which allow the students to understand the exam assignments despite the limitations of their disability; **changes to how students answer the questions**—such as ignoring students' spelling mistakes and cleaning up students' penmanship—which allow students to answer exam questions without compromising the evaluation of their knowledge; **changes to the duration of the test**, i.e., giving more time to students who work more slowly; and **changes to the essence of the exam**, such as an oral exam and a reduction of the exam material. The nature of the accommodation is determined in accordance with the specific difficulties that have been diagnosed in the student.

Accommodations are divided into three levels, based on the extent and nature of the changes to the exam:

Level 1—Accommodations that have no impact on the nature of what is measured by the test. This type of accommodation usually has no impact on students without learning disabilities (i.e., granting the accommodation will not improve the achievements of someone who does not suffer from any learning disabilities). These accommodations include transcribing the students' answers, typing the answers using a computer, granting extra time, enlarging the questionnaire, and using an expanded formula sheet.

Level 2—Accommodations that primarily affect the exam conditions but not the exam content and that could partially compromise the nature of what the test measures, such as reading the questions out loud and dictating answers to a neutral tester. Note that starting in the 2018–19 school year, these accommodations will be granted only by computer—i.e., questions will be read aloud by a computer and the answers will be typed on a computer.

Level 3—Accommodations that include changes to the test conditions and content, which change the nature of what is measured by the exam. These include an oral exam in English



or text-intensive subjects; a modified test;⁵⁶ reading aloud or dictation in Arabic- or Hebrew-language subjects; and replacement of the math test with another science subject. **Because accommodations on this level changes the nature of the test, they are to be granted only in special cases, where Level 1 and Level 2 accommodations are insufficient.**

Level 1 accommodations are usually granted by a school committee⁵⁷ (with the exception of allowing transcription or dictation of answers, which is granted by a district committee) and some (transcription, extra time, larger questionnaire) do not require didactic or psycho-didactic diagnosis. Level 2 and Level 3 accommodations require a decision by the district accommodations committee.⁵⁸ Students must undergo didactic diagnosis in order to receive Level 2 accommodations, while Level 3 accommodations require a psycho-didactic diagnosis. Schools must submit applications for accommodations to the district accommodations committee at the end of the school year that preceded the year the exams are to be taken.⁵⁹

3.1. Data on Accommodations in Advance of Matriculation Exams

According to the Ministry of Education, the professional and academic literature states that 3–15% of students are expected to need some kind of testing accommodations in order to overcome their learning disabilities.⁶⁰ **In 2016, some 44,000 students who took the matriculation exams (45% of all examinees) were eligible for testing accommodations due to learning disabilities (note that some of the accommodations—primarily extra time—are now granted even in the absence of a diagnosis of a learning disability⁶¹).**

⁵⁶ A modified test grants the student greater choice among the exam questions or allows him or her to answer fewer questions, while ensuring that the student is tested on the same material as the rest of the students. Ministry of Education, Psychological Counseling Service, Department of Learning Disabilities and ADD, Adjusted Tests for Students with Learning Disabilities, 8 August 2017.

⁵⁷ The committee will be composed of the school principal or his or her representative (committee chairperson), homeroom teacher, school counselor, guidance counselor, subject teachers, school psychologist (if available), educational performance assessor (if available), and learning disabilities and accommodations coordinator, as well as other people at the school's discretion.

⁵⁸ The committee will include the district director or his or her representative (committee chairperson), district psychologist or his or her representative, counseling inspector or his or her representative, and a didactic diagnostician appointed by the district director.

⁵⁹ Schools were required to submit accommodation requests for tests to be held in the 2018–19 school year by 3 June 2018.

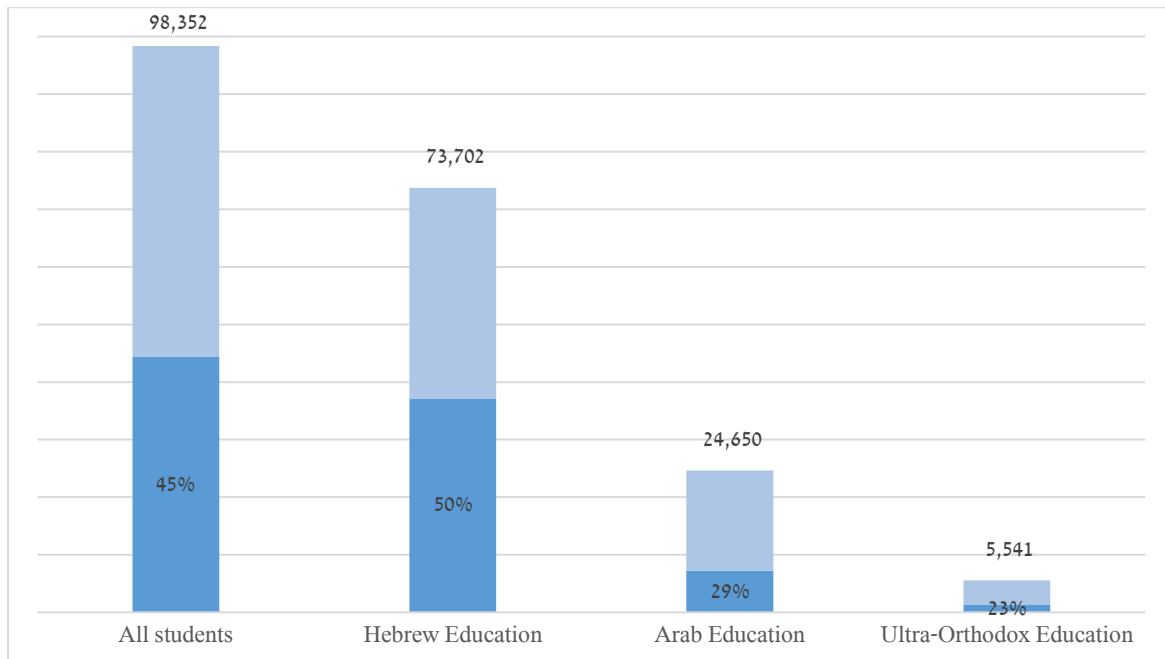
⁶⁰ Psychological Counseling Service, [MeLakuyot Lelmida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), Ministry of Education, no date, Page 7.

⁶¹ We note that the Ministry of Education stated that it decided three years ago not to condition the approval of extra time for a test on a diagnosis. This was due, on the one hand, to the large number of cases in which students sought diagnosis only to get a recommendation for extra time and, on the other hand, to the understanding that the teaching staff is sufficient skilled to identify students who express capability and knowledge but do their everyday classwork slowly. According to the ministry, this change led to an increase in recent years in the number of students who receive extra-time accommodations (we note that CBS data do not point to an increase in the rate of level-1 accommodations—including extra time—but these data are current as of 2016, only one year after the aforementioned policy change). The ministry stated further that due to the change, there is currently no way to know the percentage of students who receive extra time on tests and actually do suffer from a learning disability or ADD that requires extra



The following chart presents data on examinees and accommodation recipients, broken down by sector.

Chart 1: Number of Examinees and Rate of Accommodation Recipients, by Sector, 2016⁶²



In the Hebrew education system (including the ultra-Orthodox track), the rate of accommodation recipients among examinees (50%) was higher than it was among all students; this rate was particularly high in the State Hebrew education track (53%). By contrast, the rate of accommodation recipients was quite low in the Arab education system (29%). The rate of accommodation recipients among those who took matriculation tests was lowest in the ultra-Orthodox track, at 23%.

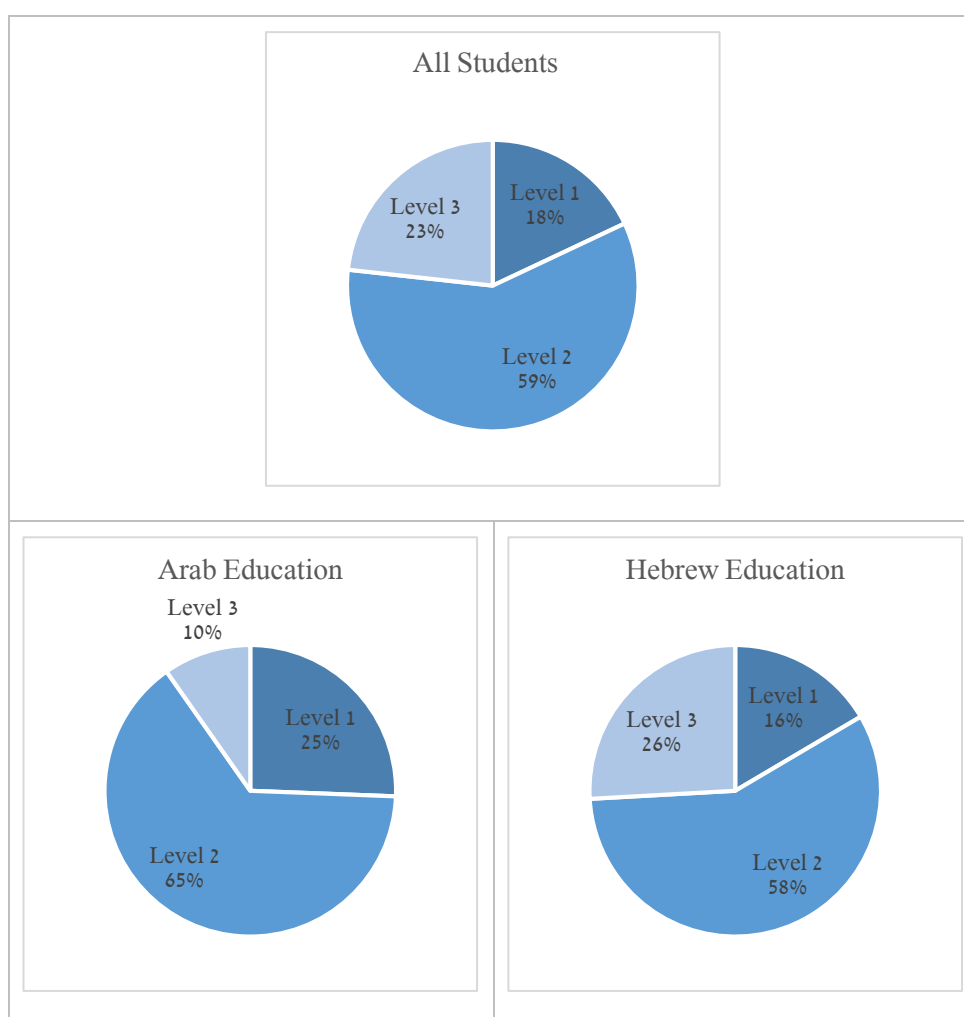
Chart 2 presents a breakdown of accommodation recipients across the entire education system—both the Hebrew and Arab education systems—into the different levels of accommodations.

time. Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 24 June 2018.

⁶² Central Bureau of Statistics, Statistical Abstract of Israel 2017, [Table 8.18: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2016 Data), 19 September 2017.



Chart 2: Breakdown of Accommodation Recipients by Accommodation Level, 2016⁶³



As the chart shows, **nearly a quarter of all the students across the entire education system who were granted accommodations (i.e., 10% of all examinees) received Level 3 accommodations, which change the nature of the exam and are supposed to be granted only in special cases, when Level 1 and 2 accommodations are insufficient.**⁶⁴ In the Arab education system, 10% of the students who were granted accommodations were deemed eligible for accommodations at the highest level—Level 3—as compared to 26% of the accommodation recipients in the Hebrew education system. **We note that since 2011, the rate of accommodation recipients in the Arab education system who were granted Level 3 accommodations increased by five percentage points, while the rate of accommodation**

⁶³ Central Bureau of Statistics, Statistical Abstract of Israel 2017, [Table 8.18: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2016 Data), 19 September 2017.

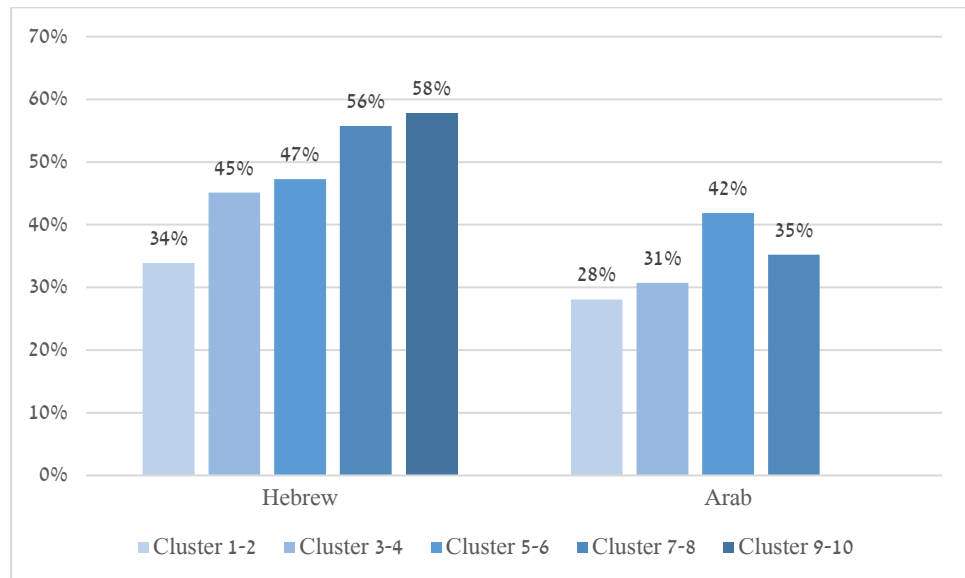
⁶⁴ [Director General Circular 5764/4\(b\): 4.3–25 Testing Accommodations for Internal and External Examinees with Learning Disabilities](#), 1 December 2003, Section 3.3.2.



recipients in the Hebrew education system who were granted Level 3 accommodations dropped by five percentage points.

There are also differences in the rate of accommodation recipients between students from different socioeconomic backgrounds, as seen in the data presented in the following chart.

Chart 3: Rate of Accommodation Recipients among all Examinees, by Sector and Socioeconomic Cluster of Locality⁶⁵



The chart shows that the rate of accommodation recipients increases the higher the socioeconomic cluster of the locality where students who take the matriculation exam live. We note that the chart indicates that the rate of accommodation recipients among Arab examinees from localities in clusters 7 and 8 is lower than that among Arab examinees from localities in clusters 5 and 6. However, clusters 7 and 8 do not include any Arab local authorities—only mixed authorities—and the socioeconomic status of these authorities does not directly attest to the socioeconomic status of the authority's Arab residents.

Looking at the data over time indicates that the number of accommodation recipients grew by 46% from 2011–2016, while the number of examinees during these years grew by only 13%. In other words, the rate of recipient accommodations among examinees in 2016 (45%) is more than ten percentage points higher than in 2011. Note that the upward trend

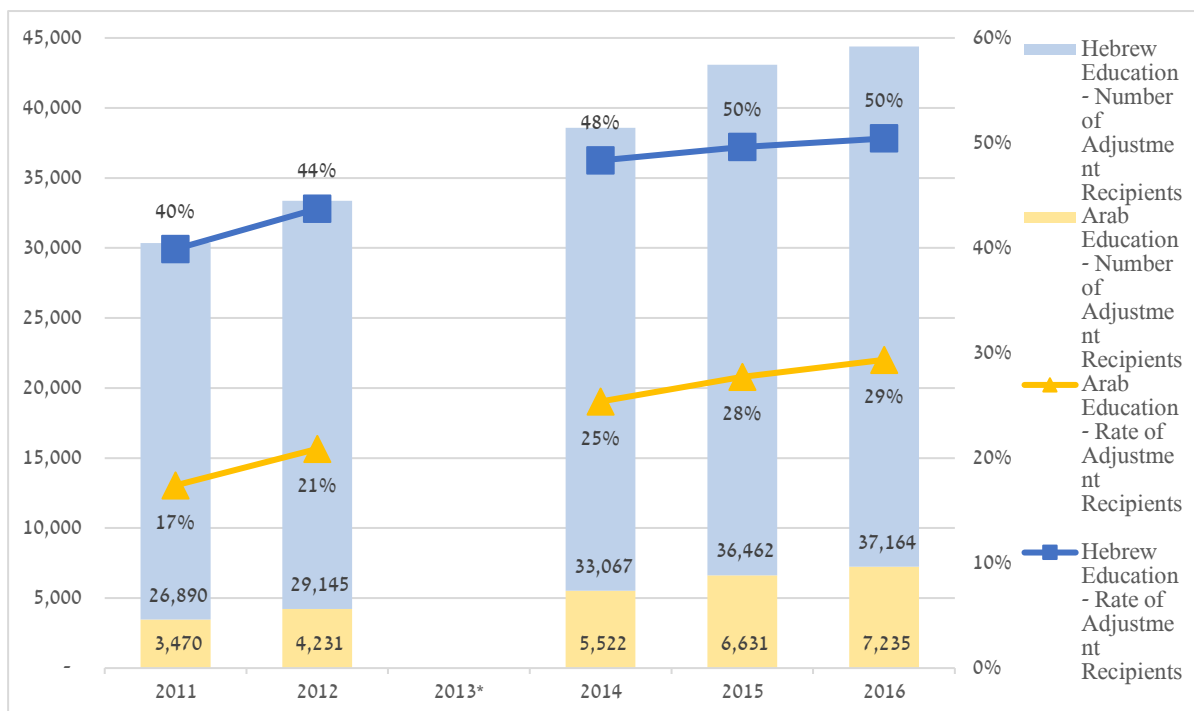
⁶⁵ Central Bureau of Statistics, Statistical Abstract of Israel 2017, [Table 8.18: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2016 Data), 19 September 2017.



in the number and rate of accommodation recipients is not new, and it has been documented since at least the early 2000s.⁶⁶

A breakdown of the data from recent years by sector shows that the number and rate of accommodation recipients in the Hebrew and Arab education systems have increased at different rates, as evident from the data in the following chart.

Chart 4: Number and Rate of Accommodation Recipients Among All Examinees, by Sector, 2011–2016⁶⁷



* 2013 data were not published, breaking the progression

⁶⁶ A study performed by the Central Bureau of Statistics in 2010 found that the number of accommodation recipients doubled between the 1999–2000 and the 2006–07 academic years. The rate of accommodation recipients among all students in grades 10–12 increased from some 11% to some 20% during those years (note that this datum refers to the rate of accommodation recipients among all students and not just among matriculation examinees, and it therefore cannot be compared to the more recent figure above). The gap between Jews and Arabs among accommodation recipients is also not new. According to the study, in 2006–07, the rate of accommodation recipients in the Arab sector (5.7% of students in grades 10–12) was particularly low compared to the Hebrew sector (23.9%). See Central Bureau of Statistics, [Work Paper 58: Students Receiving Testing Accommodations in Matriculation Exams—Attributes and Achievements](#), December 2010, pp. 13–15. Note that at least until 2015, the rate of the increase in the different socioeconomic clusters was similar, albeit slightly sharper in higher clusters: between 2011 and 2015, the rate of accommodation recipients among examinees grew by 9 percentage points in lower-middle clusters (1–2, 3–4), 10 percentage points in the middle clusters (5–6), and 11 percentage points in middle-high clusters (7–8, 9–10). Note that the 2016 data were divided into clusters using the 2013 socioeconomic index; because data from previous years were divided into clusters using the 2008 socioeconomic index, they cannot be compared to more current data.

⁶⁷ Central Bureau of Statistics, Statistical Abstract for Israel 2013, [Table 8.25: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2011 Data); Statistical Abstract for Israel 2014, [Table 8.25: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2012 Data); Statistical Abstract for Israel 2016, [Table 8.25: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2014–2015 Data), 27 September 2016; Statistical Abstract for Israel 2017, [Table 8.18: Examinees who Received Accommodations Ahead of Matriculation Exams, by Select Traits](#) (2016 Data), 19 September 2017.



The number of accommodation recipients in the Arab education system more than doubled (a 109% increase) from 2011–2016 (the number of examinees in the Arab education system grew by merely 24% during those years) while the number of accommodation recipients in the Hebrew education system also increased during those years, but at a lower rate—38% (the number of examinees grew by merely 9%). These changes altered the rate of accommodation recipients across all sectors: the percentage of Jewish examinees who received accommodations increased by 10 percentage points between 2011 and 2016—similar to the growth in the general population—while the percentage of Arab examinees who received accommodations grew somewhat more during that period (12 percentage points).

As the data above shows, despite the rapid increase in the percentage of accommodation recipients in the Arab sector, which narrowed the gap in the rate of accommodation recipients between the different sectors, the gaps are still substantial, and they overlap with socioeconomic gaps. Nevertheless, **given the high rate of accommodation recipients in all population groups and the gap between this rate and the rate of students who—according to the professional literature—need accommodations in order to cope with their learning disabilities (3–15% of the students, according to the Ministry of Education⁶⁸), we cannot point to a problem of under-diagnosis in certain groups of students, at least based on our macro data. However, due to the fact that at least some of the accommodations grant recipients an advantage over examinees who do not receive them, they do favor students of certain population groups.**

However, we note that a shortage of Arabic-speaking diagnosticians and Arabic-language identification tools and valid, modified tests was reported in the past.⁶⁹ We have no information regarding the current situation; 2013 data point to a shortage of Arab psychologists. In 2013, Arabs composed only 3% of psychology MA recipients, 5% of licensed psychologists, and a similar rate of people working in this field.⁷⁰

⁶⁸ Ministry of Education, Psychological Counseling Service, [MeLakuyot Lelmida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, p. 7.

⁶⁹ Commission to Maximize the Ability of Students with Learning Disabilities (First Margalit Commission), [Commission Report](#), June 1997, pp. 7–8; Ministry of Education, [Committee for Examining Learning Disabilities in Arab Sector](#), March 2008, in Yousef Jabarin and Ayman Agbaria, [Education on Hold: Government Policy and Civil Initiatives to Promote Arab Education in Israel](#), Dirasat: Arab Center for Law and Policy and the Clinic for the Rights of the Arab-Palestinian Minority, Faculty of Law, University of Haifa, November 2010, p. 39.

⁷⁰ Matan Shahak, [Data on Students, Degree Recipients, Licensed Professionals and Workers Employed in Several Health Professions, by Population Group](#), Knesset Research and Information Center, 19 July 2015, p. 3.



As mentioned above, the Director of the Department of Learning Disabilities and Attention Deficit Disorders in the Ministry of Education stated during a Knesset discussion that there is no actual need for all 2,000 diagnosis grants it allocates every year.⁷¹ It is important to note in this regard that the **Margalit Committee (which the Ministry of Education established in late 2013 to examine the principles of the policy for treating students with learning disabilities)** noted that while the data received on the number of testing accommodation recipients and their distribution in the population point to variations based on students' socioeconomic, sectoral, and cultural backgrounds, most of the divergence can be attributed to the inclination to include students' functional difficulties—which do not necessarily stem from learning disabilities and which are not properly treated as such—under the umbrella of "learning disabilities."⁷²

4. System-wide Program for Treating Students with Learning Disabilities—"MeLakuyot LeImida"

According to the Ministry of Education, the substantial gap between the rate of students who are granted accommodations (which reaches 50% or higher in some population groups) and the rate of students who are supposed to need accommodations according to the professional and academic literature (3–15%) indicates an overuse of testing accommodations. In light of this overuse and the ongoing increase in the number of students who are granted accommodations, the Ministry of Education decided to reevaluate the role of the education system in helping struggling students, including those with learning disabilities and ADHD.⁷³ Following this process, during academic year 2017–18, the Ministry of Education started to gradually implement a system-wide reform for identifying and treating students with learning disabilities and ADD. **The reform began during the 2017–18 academic year as a pilot in 76 junior high schools in 15 local authorities. During the 2018–19 academic year, the reform is expected to expand to another 100 junior high schools in 23 more authorities. According to the Ministry of Education's plan, the reform will be implemented in all the junior high schools in Israel within 5–6 years.** The first stage of the

⁷¹ Committee for the Rights of the Child, Knesset Record 200, [Diagnosing Learning Disabilities in Children from Underprivileged Families](#), 20th Knesset, 6 February 2018, pp. 16–17.

⁷² Committee for Shaping Policy Principles for Treating Students With Learning Disabilities (Second Margalit Committee), [Committee Report](#), 1 August 2014, p. 7.

⁷³ Ministry of Education, Psychological Counseling Service, [MeLakuyot LeImida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, p. 7.



program will be implemented only in junior high schools, but the Ministry of Education reported that it had deliberated drafting a work plan that would adapt the program for implementation in elementary schools.⁷⁴ **According to the response from the Ministry of Education, it intends to allocate NIS 75 million to the implementing the program over a period of 5–7 years.**⁷⁵

As mentioned above, the program defines a learning problem as a disorder rather than a disability (based on the definition in DSM-5 from 2013) and emphasizes the requirement that an educational intervention take place as a prerequisite for defining a condition as a learning disability. As a result of this definition, **the program seeks to change the focus of addressing students with disabilities from testing accommodations to adjusting teaching and learning methods. For this purpose, the school must promote continuous, gradual, and documented work with struggling students, who will be identified through tests administered in the beginning of grade 7.** After identifying the students and examining their needs, the school will need to develop intervention plans to advance all the struggling students and regularly follow up on their progress, all the while examining the efficiency of said intervention. To that end:⁷⁶

- Each student will be given a custom-tailored intervention plan, which will address issues such as reading fluency, reading comprehension, vocabulary, written expression, and learning strategies. The plans will be created and administered by teachers who specialize in assessing educational performance (Hebrew acronym, MATAL). Such teachers will be allocated three additional weekly work hours for this purpose. In addition, the educational performance assessor will guide and train teachers to work with struggling students.
- The progress of struggling students will be documented in their personal files (summary, follow-up, learning—SEMEL, in the Hebrew acronym), and this file will accompany them from the moment they are identified until they complete junior high school. Monitoring the intervention will enable educational staffs to offer students a more accurate response that is based on the profile that emerges. When the students complete junior high school, the file will be transferred to their high

⁷⁴ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018.

⁷⁵ Ibid.

⁷⁶ Ministry of Education, Psychological Counseling Service, [MeLakuyot LeImida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, pp. 9–10.



school for further evaluation of the children's needs and intervention, subject to parental approval.

- After mapping students' needs, the school will operate **supplementary educational, social-behavioral, or emotional intervention programs**. The programs will be selected from an approved pool, in which some programs were developed by the PCS and appear on its website⁷⁷ and others, which are in the [Ministry of Education's Database of External Educational Programs](#), were developed by external entities and are carried out without assistance from the Ministry of Education staff. Some of the programs are used to develop the skills of the school's teaching staff, while other programs work directly with the students. Some of the programs are intended for the entire educational institution or the students of a certain grade, while others focus on students with learning disabilities. **In the 2018–19 school year, the annual budget ceiling for operating up to two supplementary programs in each school is NIS 30,000.**⁷⁸

We note that even today, besides the regular educational work performed by the school's educational staff—which also includes targeted interventions intended to advance students with learning disabilities⁷⁹—schools can choose to run supplementary programs offered on the PCS website or the database of external programs. However, **the Ministry of Education reported it does not have data regarding the extent to which these intervention programs are implemented in educational institutions.**⁸⁰

Aside from direct interventions for struggling students, schools participating in programs will conduct professional development processes for the educational staffs and multi-professional teams. For this purpose, the teaching staff is allocated ten hours of professional development each year for three years, alongside pedagogical support and constant

⁷⁷ Idem, [Intervention Plans for Treating Students with Learning Disabilities and/or ADD in Schools and the Community](#), no date.

⁷⁸ Ministry of Education, [Criteria for Selecting Intervention Plans under "MeLakuyot Lelmida" Reform Pilot—5779 and thereafter](#), May 2018.

⁷⁹ For example, the ELA program (Hebrew acronym for Identification, Diagnosis, Learning, and Assessment), which is conducted in junior high schools and is led by a teacher specializing in educational performance assessment (MATL), is meant to develop a psychological-pedagogic school culture for the benefit of all students, while providing with a personal and custom-tailor focus among the educational staff on the learning needs of students struggling in junior high and high school, including students with learning disabilities, by structuring teaching processes tailored to the learners' needs. Ministry of Education, Secondary Education Department A, [ELA Program \(Location, Diagnosis, Learning and Assessment\)](#), updated 24 August 2017, accessed 26 July 2018.

⁸⁰ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, Letter, 24 June 2018.



guidance of the school's educational staff by expert instructors, as well as professional development for other professionals working in the system: psychologists, counselors, study performance assessors, inclusion support teachers, and learning disability diagnosticians.⁸¹

Alongside the educational interventions and the assessment of their contribution, tests to determine the necessity of testing accommodations will be conducted during eighth grade for students who continue to struggle and whose difficulties stem—according to evaluations—from neurological issues. These tests are administered by giving the students side-by-side tests (a regular test and a test with accommodations). Because level 1 accommodations are supposed to provide a solution for most students with learning disabilities, lower-level accommodations must be examined and proven to be ineffective before determining that the student needs higher-level testing accommodations.⁸²

Only in ninth grade—after interventions and an examination of necessity and after cross-referencing and integrating the data collected in the SEMEL file with all of the student's information—can the decision be made to refer the student for a learning disability diagnosis; after the diagnosis, a decision can be made on the student's eligibility for testing accommodations.⁸³ The Ministry of Education stated that the program is based on the assumption that by identifying struggling students early at the start of junior high school and providing the appropriate intervention during the years of schooling, most struggling students could acquire tools and skills that would help them sidestep the difficulty without testing accommodations. At present, however, it is too early for the ministry to estimate how many students will require accommodations despite early intervention.⁸⁴

The diagnosis of learning disabilities through the program will be performed at MeLakuyot LeImida centers, which will be established in EPS centers in the localities that participate in the program. These centers will employ educational psychologists and didactic diagnosticians who meet the professional requirements set by the Ministry of Education. They will perform diagnoses only for students referred by the education system and after intervention processes are performed and documented in the SEMEL file throughout a three-year process. At the end of the process, students will be granted testing

⁸¹ Ministry of Education, Psychological Counseling Service, [MeLakuyot LeImida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, p. 10.

⁸² Ibid, pp. 35–36.

⁸³ Ibid, p. 37.

⁸⁴ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, Letter, 13 June 2018.



accommodations if that is deemed to be necessary after all the functional aspects during the student's studies in junior high school (not only the assessment) have been taken into account.

The Ministry of Education stated that under the reform, it would recognize only recommendations for accommodations on matriculation exams that stem from diagnoses performed in centers under its supervision, though it will continue to recognize private diagnoses for other purposes and age groups. The informational document on the program notes that diagnoses will be partially or fully funded by the Ministry of Education. The Ministry of Education further stated on this matter that it will fund most of the cost of diagnosis, and that a final decision will be made in the next few months.⁸⁵

As mentioned above, the program is expected to operate in 176 junior high schools in 38 local authorities in the 2018–19 school year. Authorities were selected for the pilot based on recommendations from the Ministry of Education's district directors and compliance with certain criteria, including the existence of an EPS center in the authority that serves as a recognized institution specializing in educational psychology and A-level psychological services at the junior high schools in the authority.⁸⁶

The pilot included local authorities in socioeconomic clusters 1–8, ten of which are Arab authorities (of which four started implementing the program in the 2017–18 school year) and the rest are Jewish authorities.

The list of authorities participating in the program can be found in the appendix.

⁸⁵ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018; Ministry of Education, Psychological Counseling Service, [MeLakuyot Lelmida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), no date, p. 10.

⁸⁶ Ministry of Education, [Criteria for Selecting Intervention Plans under "MeLakuyot Lelmida" Reform Pilot—5779 and thereafter](#), May 2018.



Appendix: List of the Local Authorities Participating in "MeLakuyot Lelmida" Program, 2017–18/2018–19⁸⁷

Start of implementation	District	Local authority	Number of junior high schools	Socioeconomic cluster
Started implementation in 2017–18	South	Eilat	4	6
		Rahat	7	1
		Sderot	2	4
	Haifa	Or Akiva	3	5
		Kafr Qara	2	4
		Kiryat Bialik	2	7
		Kiryat Motzkin	3	7
	Jerusalem	Beit Shemesh	8	2
		Modi'in-Maccabim-Reut	11	8
	Center	Hod Hasharon	3	8
		Raanana	7	8
	North	Yarka	2	3
		Ma'alot-Tarshiha	4	5
		Nazareth	6	3
	Tel Aviv	Netanya	12	6
Started implementation in 2018–19	South	Ashkelon	10	5
		Beer Sheva	13	5

⁸⁷ Dani Giorno, Director of the Department of Learning Disabilities and Attention Deficit Disorders, Psychological Counseling Service, Ministry of Education, letter of 13 June 2018; Ministry of Education, Department of Learning Disabilities and Attention Deficit Disorders, [MeLakuyot Lelmida: Systematic Program for Treating Students with Learning Disabilities and ADD](#), Presentation for Special Committee for the Rights of the Child, 6 February 2018. Data on grouping localities in socioeconomic clusters: Central Bureau of Statistics, [Characterizing Geographic Units and Categorizing them by the Population's Socioeconomic Level in 2013](#), Table 1: Local Authorities, in Alphabetical Order of Hebrew Names: Socio-Economic Index Value 2013, Rank and Cluster, and Variables Used in the Computation of the Index, 30 November 2017.



		Hura	4	1
		Yeruham	3	4
		Netivot	4	3
	Haifa	Umm al-Fahm	6	2
		Tirat Carmel	2	4
		Pardes Hana	4	7
		Kiryat Ata	4	6
		Kiryat Tivon	1	8
	Jerusalem	Abu Ghosh	1	3
		Mevaseret Zion	1	8
		Mateh Binyamin	6	4
		Ma'ale Adumim	6	6
Started implementation in 2018–19	Center	Elkana	2	7
		Ariel	1	6
		Kfar Sava	10	8
		Kafr Qasem	2	3
	North	Bu'eine Nujeidat	2	2
		Tamra	4	2
		Migdal Haemek	3	4
	Tel Aviv	Or Yehuda	3	5
		Herzliya	8	8

