

SALT Lake Community College

Disability Resource Center

External review

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Respectfully Submitted by

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Acknowledgement

The external review team congratulates the Disability Resource Center and its supporting managers for the painstaking and thorough job done in preparing the internal review, planning and carrying out procedures for the external review, and serving as such gracious hosts.

Method

The external review team (Reviewers) first studied the Disability Resource Center (DRC) internal review, and found it comprehensive, introspective, mission oriented, and data driven—so much so, that the substance of this report will be factually consistent with the results of the DRC's self-assessment . However, we shall avoid, as best we can, simply restating that report's discussion and findings, notwithstanding the fact that our observations and analysis largely corroborate it. Over two full-length workdays, the Reviewers met with various constituencies—students, faculty, student affairs managers, DRC's internal assessment teams, and administrative and professional staff across campus, as planned by the college. Our report will draw heavily on information and concerns shared with us by those we interviewed. Senior student affairs administrators stressed that the Reviewers should pay particular attention to, and should report on, the reflections and concerns of the DRC's external constituents across the campus and address four broad topical areas of concern. DRC Director Rod Romboy raised six questions in his section of the internal review for the external reviewers. While the Reviewers attempt to address executive concerns and director's questions throughout the report, the reader will find in the appendix summary responses to the four topics and six questions. The appendix will no doubt contain both redundant and new material relative to the body of the report.

The report should be read as an assessment of DRC and its work and not as a compliance driven assessment of the college and its management team. That said, we will posit broadly organized, planned, full campus community participation in welcoming and integrating people with disabilities throughout the workings of the college, which of necessity includes the support of top educational leadership. We will also report any policy or specific compliance problems that stand out.

Reviewer Randall Borst is the principal author of the report, and he accepts responsibility for many of the recommendations found here, though the writing draws heavily on the indispensable observations, analysis, and

recommendations of the rest of the team, including their review and comments on an intermediate report draft. The report is not an academic paper and will not go to the extent of formal citation of specifics of the legislation or regulations. However, the author recommends the reader consult independently with Reviewer Melissa Frost to identify supplemental regulatory information to provide guidance in addressing specific questions as the college considers acting on the Reviewers' recommendations.

Executive Summary

based on our reading of the DRC's internal review and meetings with the writing teams, the Reviewers found at the DRC an active corps of professionals with considerable expertise and experience that carries out its services to students effectively and in ways consistent with the state of the art of professional development and service in the field of disability support services in post secondary education. Across campus the DRC enjoys a reputation for staff expertise, caring commitment to its mission, a professional approach to its consumers and constituents, and high-quality consultation and recommendations. In fact, several faculty and staff the Reviewers interviewed expressed their desire for increased liaison between the DRC and academic and operating departments. Goings on around the office as we observed them exhibited very high morale, which obviously is an absolute necessity for that type of office. The office is expertly managed, and it employs excellent self-constructed management tools such as a sophisticated application of MS Access, for consistent, high-quality consumer information management.

As thoughtfully revealed in the DRC's internal review, the staff is well aware of government regulations protecting the rights of students with disabilities and of how to implement so-called reasonable accommodations, given the resources made available to them in the learning environment that SLCC comprises. They are asking themselves questions about their intake process, eligibility requirements (i.e. documentation of disability). The intake process is sound, if somewhat cumbersome, and the short turnaround time from first

meeting to accommodation implementation impressive. Though by the DRC's own admission, students routinely have to wait too long for appointments with an advisor, up to three weeks during peak service/need periods.

The staff suspects (correctly) that current requirements and DRC disability documentation review process should be seen as grounded more in traditions of the field and what was permitted by the federal government prior to the enactment of the Americans with Disabilities Act Amendments Act (ADAAA) than in what is currently permitted. Changes are recommended for consideration around the disability verification review process, both for compliance and organizational efficiency.

As would be expected in any such office of similar size, serving such an overwhelmingly large population of students with disabilities, a healthy tension between the ethics of facilitating student responsibility versus staff-student handholding is ongoing. The Reviewers recommend DRC consider moving beyond that question and shifting from a clinical-style model (caseload management) heavily weighted toward centralization within the auspices of the DRC, toward a freewheeling model of rapid consumer service and support through community awareness, campus-wide participation, shared responsibility, and accountability. Such a shift would suggest a streamlining of DRC processes and management style, combined with aggressive planning for comprehensive disability integration campus wide. While such a shift sounds philosophically prudent on nearly any campus, where numbers of students utilizing reasonable accommodations are so large, bottlenecks are foreseeable at various points of complex process of: service application and review, disability and service-need verification, familiarizing student consumers with policies and practices pertaining to this process, accommodation and, finally, faculty and external staff notification of each student's accommodation needs around campus as well as in the classroom. The Reviewers offer several suggestions we hope the DRC finds helpful.

Too little is known about the success rate and effectiveness of reasonable accommodations outside DRC facilities, but the reviewers heard a fair share of

narrative to suggest there is ample room for improvement, at least in some departments more than in others. For example, the DRC staff has raised concerns about the effectiveness of lecture notetaker service implementation, which is problematic at best throughout the field nationally and a matter for concern of two members of the SLCC faculty we interviewed. The general difficulty of identifying, training, and fielding peer notetakers is further complicated by the large number of SLCC students utilizing that service. The Reviewers recommend two technological solutions and encouragement of the faculty to make lecture notes available to all students online.

The staff is concerned that some of the responsibilities placed with the DRC by the college—accessible furniture procurement and placement or course test administration for example—would be better placed in other departments, especially considering resource support for the DRC in terms of space, budget, and personnel. That said, the staff feels, and we agree, that the structural reorganization of the office by the human resources component, renaming and reclassifying jobs, etc., has signaled the college's central commitment to having a well functioning, properly recognized and compensated DRC. The Reviewers observed that level of commitment and concern on the part of managers we interviewed. The Reviewers share the DRC staff's concern that current space allocation and design, particularly at South City Campus, do not allow staff-student interaction sufficient to protect student privacy, to the point of risking noncompliance. DRC staff feels that sharing reception space with Academic Advisement significantly disadvantages DRC consumers.

Owing in no small part to the effectiveness of the DRC in building up such a large number of students with disabilities working and interacting effectively throughout the campus, for the most part well integrated with their student peers, the Reviewers got a clear sense that SLCC is ripe for planned and organized accessibility compliance and full integration of students with disabilities. In keeping with peer institutions, and in the spirit of original government regulations implementing federal laws affecting the rights of individuals with disabilities, SLCC's president and provost should jointly commission a campus-wide

accessibility council (with ex-officio participation by several DRC staff) to be divided into working committees. Such a council should partner with campus diversity efforts at any opportunity. The council should be given technical support of an external expert consultant as it develops policies and makes recommendations for regulatory compliance.

Finally, the campus should consider renaming the DRC, for example, replacing “disability” with “accessibility,” and use the word “disability” sparingly in its communications, as context may suggest.

Student Narratives

Four student narratives illustrate the inestimable importance of the work of DRC and thousands of similar offices throughout higher education. Names of these SLCC students are changed for the sake of protecting student privacy.

Valerie is legally blind and a nontraditional student. She had tried attending SLCC years ago, but the attempt failed. She explains that some of her course instructors willingly accommodated her while others flatly refused. There was no DRC in those days, at least none Valerie knew about, so after leaving the college unsuccessfully, she took training for the state's blind vendor program, through the auspices of the Randolph-Sheppard act establishing state services nationally for blind people to operate minor food and sundries vending facilities located in federal buildings. Now that SLC has a DRC, however, Valerie is back and doing well. She utilizes all accommodations available to her, which sum to all accommodations she has requested. After completion of her Associates degree at SLCC, Valerie plans to complete a bachelor's degree at the university and then go on for the MBA, leading to a career in financial management. What was once unattainable is now at least as realistic as would be for her peer students at SLCC, because of the work of the DRC and collaboration by faculty and staff across campus.

Doug has a disability which kept him isolated from the general public for over 25 years. Breaking his isolation, Doug found the state vocational rehabilitation program and was accepted for services by that agency. He was

admitted to SLC and was referred to DRC by his vocational rehabilitation counselor. He went to his first DRC appointment with no clue whatever what he would find there. A sympathetic ear perhaps and a couch? He didn't know. Is DRC advisor began the first interview by asking him a question, "what are your goals here at SLCC, and how do you think I might assist you in accomplishing them?" The conversation began, and the topic of disability never came up until way past the half point of the interview. Yet, by the time the interview had ended, everything Doug would need in the way of academic adjustments and auxiliary aids and services were planned and ready to be implemented. Doug could only say one word to himself after leaving the interview, "Wow!" Now in his second year of classes at SLCC, Doug sees himself as never to return to his former isolation. He stresses that the services and accommodations the DRC has implemented for him make him an equal in the classroom.

Harriet has considerable bilateral hearing loss and uses hearing aids. She is attending courses in the school of nursing. The DRC has purchased equipment to aid in communication, and an amplified stethoscope. She has notetakers in her classrooms. In her brief but heartfelt narrative, Harriet stressed that at SLCC, she feels that her opportunities are as great as those of any other student.

Jose is majoring in geology. He is recovering from an illness that left him with cognitive impairments, and he manages his anxiety by utilizing the services of the counseling center on campus. He takes quizzes in class but utilizes the testing center for tests. When other students ask him why he is not there for tests, he feels compelled to tell them he has a disability and takes tests under alternate conditions. He feels a bit disconnected from the process of setting accommodations and notifying faculty. He likes his advisor, however, and feels the advisor does a great job. He does not feel that scanned textbooks and other reading materials are of sufficient quality for his needs. Jose thinks the DRC should do more to check back with students to find out if accommodations are working effectively. He would like more information about classes before he takes them, and he would like his course instructors to know more about his disability and needs within the classroom. Specifically, he would like them to

speak more slowly so that he can take his own notes. Taking tests online heightens his anxiety, and he wishes the college could find a way to let him take his tests on paper.

Recommendations for DRC Internal Operations

The Disability Resource Center (DRC) should engage in some difficult choices for increasing effectiveness of its work to a degree beyond student and community satisfaction. In order to get to a level of service and compliance the staff and the Reviewers would like to see achieved, practicing business as usual the DRC would need to at least double the number of its advisers, at least double its space footprint, enjoy a large increase to its budget well beyond bringing it out of the red—none of which seems likely any time soon, given national and state ecopolitical realities. Acknowledging that caseloads of 400 students or more cannot be given comprehensive caseload management services, the DRC should consider abandoning that management tradition.

More than simply a problem of whether students should be required to exercise greater independence and self-responsibility or should be handheld (for lack of a better term) understates the question. Perhaps the larger question is the extent to which the DRC operates under the dated and inefficient clinical model, while paradoxically envisioning an educational approach that is moving toward universally designed physical and learning environments that should lessen the need for so much case management and individualized reasonable accommodation. This is surely not to say that the staff views disability itself through the medical lens but that the structure and function of the office under the caseload-management model is clinical and potentially cumbersome in its inception, where a consumer service and community-support model could be more efficient and sustainable if successfully extended across campus. The caseload-management model is a treatment model, devised by treatment specialists. Traditionally, the model involves comprehensive assessment of need, joint provider-consumer planning, intensive individualized monitoring, revisiting the plan, evaluating outcomes for the individual, and defining success in terms of

whether all of that can be documented to have worked. A professional-personal relationship between caseload manager and client is presumed. Effective case management of that kind in our field of postsecondary educational disability support services can be practiced effectively on caseloads no larger than some 150 students. Because some students' situational relationships with the college probably do require case management services however—those with chronic illness, very significant mental health impairments or autism, students who are culturally disadvantaged by their disabilities for example—the intake process should identify students who decidedly need caseload management services. Many students who need only the more standard accommodations (extended time and distraction-reduced settings for course tests, etc.) could work with any one of a number of individual staff members as the occasion arises. Perhaps with the DRC operating under such a model, some advisers may not have caseloads at all, while others may have realistically sized caseloads that could be managed effectively.

But the real benefit of a consumer response-community support model is that by reducing one-on-one face time with students, DRC staff can spend more time outside the office, working with faculty and staff —both of which told the Reviewers across campus they desire more of. In answer to the question of whether students with long-term disabilities and unchanging accommodation needs could be given multi-semester accommodation memos, the Reviewers would say yes. Perhaps such students could even retrieve their memos online, updated automatically by Access, upon request, for printing or possibly forwarding through e-mail to their course instructors. Which, by the way, brings us to the question of how to improve notice to the faculty that a student needs and has been found eligible for classroom accommodations.

Who should have primary responsibility for notifying course instructors that a student needs reasonable accommodations in class, including course tests, etc, the DRC or the student? Commitment to one side or the other of this, debate may answer the question, but does it get the job done? Both sides have their philosophical points. Probably the more efficient means would be for the DRC

simply to e-mail accommodation memos to instructors. But it is common for instructors to use their own personal e-mail addresses off-campus and not utilize college e-mail. Sending printed memos through campus mail has similar shortcomings. How can DRC be certain its memos are: received, read with clear understanding, and agreed to? On the other hand, students can have just as much difficulty contacting and conversing with their course instructors as DRC staff can. Faculty office hours are limited, and adjunct instructors may not even have office hours. The student should not be expected to catch the instructor before or after class and have a conversation about disability accommodation in a public place. Furthermore, for various reasons we need not list here, students can find it unmanageably difficult to communicate their accommodation needs to instructors, even with the DRC accommodation memo for backup.

Reviewer Borst sees the problem differently from the above dilemma. Whether responsibility for faculty notice lies with the office or with the student, the responsibility of the faculty and employing academic department's should be seen as having primary responsibility for ensuring availability of all course instructors to receive such notice. By college policy and administrative requirement, all course syllabi should contain a statement referring all students to the DRC who wish to request reasonable accommodations for the course and clearly stating contact instructions that students can either use themselves or return to DRC for processing. All concerns the instructor may have pertaining to the reasonableness or practicability of implementing reasonable accommodations should be required to be addressed in writing to the DRC. Policy should prohibit course instructors to refuse accommodations directly to the student without prior discussion with DRC staff and denial approval by the academic Department chair. Whoever has responsibility for delivering notice should report to the Department chair any difficulties contacting or communicating with a course instructor with regard to implementation of reasonable accommodations within 48 hours of the first attempt. Finally, the ongoing argument in our field over whether implementation of reasonable

accommodations is a problem of educational design or student self-advocacy cannot be settled in this report.

Next, could application review and approval be streamlined in order to process more requests and shorten the wait time for DRC consumers while ensuring compliance with ADAAA changes? The ADAAA provides that it should not be difficult for students to prove they have disabilities. Nor should the question of whether a person has a disability require extensive analysis. True enough, this rule does not mean that any person with a disability is ipso facto entitled to the accommodation of consumer choice exclusively without documentation. Accommodation choices still should be appropriately documented. The question is who should be the documenting authority for that purpose. The primary source of documentation of the impairment and ordinarily its functional limitations should generally be the medical/psychological professional treating the student, especially when the disability is not readily observable as well as educational records such as the IEP or Section 504 Plan. The DRC intake advisor, however, is more experienced at conducting a structured interview to engage the student in the iterative process of accommodation consideration than is the treatment specialist and should be seen by the college as the documenting authority for that purpose. Only on rare occasion should an eligibility review need to be seconded by an assistant director if the intake advisor follows a carefully crafted structured interview. Reducing their involvement with the internal workings of assessment review would free up assistant directors to be engage more intensely with external relations and interdepartmental liaison. The Reviewers understand that under the new office structure, that process change has already begun. We recommend it continue to its logical conclusion.

To clarify, the educational accommodation record has important but limited authority for the post secondary review of the presence of disability and reasonableness of accommodation requests. The US Department of Justice has informed the high-stakes testing industry through its guidance to compliance with Title III of the ADA as amended that they are to give considerable weight to the

educational history of accommodated testing, which also applies to Title II entities because Title II contains no contradiction of that instruction. This does not say that an accommodation for tests that is unreasonable given a specific incident of accommodation must be provided in keeping with the history, but it does indicate that the request cannot be denied for lack of corroborating clinical documentation.

However, nothing has changed about the US Department of Education's stance on whether an IEP or Section 504 Plan is sufficient to document disability and the need for accommodations more generally. DOE still confirms in its brochure "Students in Transition to Postsecondary Education" (<http://www2.ed.gov/about/offices/list/ocr/transitionguide.html#skipnav2>) that those documents are generally insufficient for that purpose. Thus it is safe to assume that an intake advisor confronted by a poorly supported IEP or Section 504 Plan and an insufficiently supported student request at a structured intake interview can still require clinical documentation, such as an updated psychoeducational assessment if none is available, for example, in the case of learning disability or perhaps ADHD. Federal regulators no longer support the test-score discrepancy model for diagnosing and verifying learning disability. Nor can a covered entity require that test scores even be reported unless it can be shown that scores of that kind are used to support specific programs or services for the student. Similarly, if a psychoeducational is present but very old, it still should be considered current if there is an ongoing accommodation history consistent with a postsecondary student's reasonable accommodation request.

The current gray area documentation-review analysis is otherwise sound. DRC should consider supplementing it with guidance for a structured interview that would inform the advisor of the student's experience with what has worked in the past, considering the functional limitations and residual capacities as described by the student . That many applicants for services are under documented, even by current realities is undeniable. Yet, in our professional field, we must be mindful that treatment providers, especially those who work with the poor and uninsured, have no idea what documentation is expected of

them and do not have the time and other resources to prepare that kind of documentation. Additionally, considering that so few Americans at the lower end of the income scale, including the working poor, have no health insurance, documentation that meets a high standard is generally unattainable for them. To enforce a high documentation standard all but rules out the poorest people, where disability is grossly overrepresented and where the greater amount of change is needed for them to succeed in life. This is not to say that whatever slip of paper a student brings in is adequate to document whatever the student says is needed, but it is to advance the validity, in a general way, of the notion that a person with a disability is a credible witness to that persons experience relative to disability and accommodation.

Next, the problem of speedy and effective implementation of lecture notetaker services is certainly not unique to SLCC. The Reviewers support the practice of fielding technologies to assist students with disabilities in gathering their own access to course lectures through, for example, digital audio recordings—but not merely for the sake of expediency. Audio recordings can under serve their purpose in lectures where extensive visual aids are utilized and not adequately described by the lecturer. Several programs have found the Smart Pen effective. The Smart Pen integrates written notes with sound recordings. These devices are particularly useful for students who have difficulty taking notes on audio content but who have intact visuomotor skills. Others who can take limited, if not comprehensive, lecture notes can also be significantly aided by the technology. Another technological solution is consistent with universal design for education. Faculty should be encouraged to post detailed lecture notes on course websites for all students. Multimodal, multimedia educational applications can be beneficial for all students while providing another form of useful auxiliary aid for many students with disabilities. Meanwhile, it should be acknowledged that reliance on student consumers and their course instructors to recruit notetakers has less than a high success rate. Could the DRC find a way to market the need for peer notetakers by e-mailing the students

in a course directly? Could peer students apply online to serve as notetakers, perhaps with some incentive such as a drawing for a nice but inexpensive prize?

Finally, DRC should take care to individualize its review of students requesting so-called priority registration. One DRC advisor reflected that he says yes to virtually any student who asks for it. The Reviewers recommend that a student with a disability who takes advantage of early registration permission should have to demonstrate a significant restriction in meeting the challenges of keeping a general schedule when compared to most students. For example, a student with a significant sleep disorder is substantially disadvantaged in a.m. classes. A student has to follow a difficult and time-consuming schedule for health management. A student has significant mobility challenges and cannot move quickly from class to class or for various reasons may need extended breaks between classes. These are just a few examples where priority registration may be appropriate, as opposed to being thought of as a benefit for no better reason than that a student happens to have a disability.

Campus Community Indicators

And Recommendations

In teams of two and individually, the Reviewers interviewed students, faculty, and staff across campus and noted broad support for full integration of students with disabilities at SLCC. Considerable credit was given to the DRC for its work in advancing that mission.

A prominent student support manager, for example, who is a clear and articulate supporter of DRC and disability integration across campus, collaborates with DRC whenever he works with a student who has a disability that he knows about. He believes the college would benefit from wider dissemination of information about disability, accessible teaching methods and tools, legal requirements, etc. he praised the DRC for its high level of adaptation to rapidly increasing numbers of students with disabilities on campus, and he suggested the college reevaluate staffing of the office in light of current need.

Another high-level official, however, didn't appear to have a firm grasp of the college's overall responsibilities for a coordinated campus-wide approach to ensuring equality of opportunity in all college programs, services, and benefits. Clearly, we saw no lack of interest or concern on the part of that college official so much as a lack of direct knowledge of the college's regulated responsibilities.

The IT services component appeared to the Reviewers to desire an advancement of collaboration between DRC and their unit. Apparently IT is prepared to take ownership of access software and make it available on computers across campus, where technically feasible and permitted by user licensing agreements. They need information about machine requirements, as well as staff training.

The Veteran's Administration SLCC representative informed the Reviewers that someone thousand military veterans are on campus, 500 of whom utilized tuition assistance. Twenty-five percent of them are estimated to have disabilities, 25-30 of whom have significant disabilities. Several veterans struggle with math and have too little experience with computer and information technology. The tutoring they receive is not enough for many of them. The VA representative works closely with and appreciates DRC. He refers veteran students to DRC routinely. Because of veterans' unique needs, the representative recommended that DRC appoint one specific individual advisor to work with veterans with disabilities. Veterans have a different understanding of disability than regulatory definitions pertaining to reasonable accommodations, and they do not like the term "disability" applied to them—which is one of the reasons why the Reviewers have recommended consideration of an office name change. Reviewer Borst notes that a University at Buffalo student who is a military veteran has informed that he would have been unable to visit the university's Office of Accessibility Resources under its previous name, Office of Disability Services. Finally, the VA representative at SLCC would like to see courses offered for early preparation in the areas of math and computer technology.

A conversation with two associate professors brought several concerns to light while anchoring their comments with praise and respect for the work of the DRC—its expertise, its approachability, and its embracing of educational values. These two faculty members are aware of and accept current practices of reasonable accommodations in their classrooms. At DRC suggestion, one professor's academic department has begun specifying essential elements of its courses while the other's has not. One noted that, when five or more students with disabilities are in one class, the instructor's resources can be challenged. The difficulty of recruiting and retaining good notetakers was discussed, with no clear solution in sight. They would prefer that the DRC would find a way to take total responsibility for fielding notetakers. Additionally, they would like to have more frequent contact with DRC staff to help them develop and extend their teaching tools and techniques. Finally, these faculty members reflected that they do not understand why students with disabilities get priority registration.

The reviewers learned that in the math lab no computer is accessible to blind students. We are concerned because the practice of fielding an assistant paid by the state vocational rehabilitation program for blind students does not meet the ease-of-use standard of the US Department of Education, Office for Civil Rights (OCR) or the most integrated-setting requirements of the Department of Justice. In the same lab, some videos are not captioned, and none have visual descriptions. That is another matter for concern, especially in the area of math instruction. The lab is attempting to find software that does not rely on Flash, which ordinarily is inaccessible to screen reader technology. The college should consider offering a math lab with transferable credits that would contain comprehensive visual descriptions for blind students, at least until the math lab can be made fully accessible by means of screen reader technology and compatible, accessible application software. Though those students could not be required to take the course.

The Reviewers identified several challenges and opportunities in the Nursing Program from students and faculty alike, several of which placed the institution at high risk of noncompliance.

Nursing faculty and administration indicated a desire for more frequent contact and more cooperation between DRC and nursing students, faculty, and staff. Students told us they feel that DRC staff was not available for them as much as they needed.

Accommodated administration of course tests is a clear and present challenge. Tests are administrated in the Nursing Program by a testing coordinator, who appears to be out of the communication loop about which students need which kinds of testing accommodations, when, and finds it difficult or impossible to schedule tests at the last moment. The Reviewers were informed that recently two students were not given extended time for tests, due to untimely scheduling and lack of space.

We are unaware of the source of some apparent misinformation. The program evidently believes that the testing coordinator is not permitted to keep information in her files about which students who use her services have disabilities and need accommodations. So long as information of that kind is handled securely, we see no reason why she should not have, for example, copies of DRC accommodation memos or at least information from DRC pertaining to nursing students who need accommodated testing. Misinformation of that kind is common throughout higher education, because "confidentiality" and "privacy" are routinely conflated. True enough, DRC must protect the privacy of medical/psychological information. The Family Educational Records Privacy Act (FERPA) permits college officials to release to one another information about the student where there is a legitimate educational interest in doing so, however. That, of course, does not include private medical/psychological information documented with the DRC. But the DRC is not a treatment center, and the information it has about students' accommodation needs is not confidential. It can be shared freely, for example, with the Nursing Program testing administrator, because that administrator has a legitimate educational interest in the information.

The nursing faculty could benefit from in-service training about disability law compliance and DRC accommodation processes and guidelines. The

Reviewers got the perception that the ADA may be viewed by some in the program as a big stick. For example, they do not appear to understand why they are not given diagnoses of students' impairments in the accommodation memo. Apparently several faculty members questioned why videos must be captioned, and they have challenged the Nursing Program chair on the point.

Assistance is needed with improving the physical facilities of the testing service in the Nursing Program. They only have four workstations in their lab, and they have 16 students with disabilities. This leaves them too little facility for providing testing with extended time. They also do not have the capability of providing distraction-reduced testing settings. No difficulties with accommodating nursing students in field rotations were revealed, which gave the Reviewers to question whether accommodations for field education are being recommended and implemented, since at other institutions across the country, more typically, accommodating students in field education is the most difficult aspect of integrating students with disabilities into nursing programs.

We recommend urgent collaboration between the director of DRC and the chair of the Nursing Program to address the above and possibly other issues, though we see no true barriers to addressing any such concerns. Nursing programs in general differ from more didactic academic programs that fit the traditional model of accommodations through academic adjustments, including auxiliary aids and services. Nursing programs are dynamic and intense. They are responsible for high-stakes learning that integrates complex scientific information with multidimensional application of patient care from routine to critical. They must teach students to handle complex medical records and instructions quickly and accurately. They employ highly specialized assessment tools. Naturally, then, all sorts of situations arise that give need to collaborative management, and they are likely to give rise to unforeseen challenges that can snowball if not addressed affirmatively and ongoing. Temporarily, until testing of nursing students can be carried out by the Nursing Program in an accommodated, regulation-compliant way, some different arrangement probably should be implemented.

Conclusion

For a host of reasons cited in the DRC's internal review, the population of students with disabilities at SLCC has increased rapidly and to the point that DRC is currently challenged, possibly beyond its means, to respond to accommodation requests on a timely, effective, and a consistent basis—at least in the case of some students and at certain times of the academic year. While staffing level versus service demand should be reassessed, along with budgetary and space needs, very likely the customary approach throughout higher education of creating a disability services component with highly centralized responsibilities for the institution's compliance with laws protecting the rights of campus community members with disabilities is no longer sustainable at SLCC. The fact that these students make up such a large percentage of the student population introduces a necessity for campus wide participation among faculty and staff ensuring the students an equal opportunity to participate meaningfully and effectively in all aspects of campus life.

Probably the most effective means of distributing compliance responsibilities throughout the campus community would be for the college to create an accessibility Council, committee, or some such body sanctioned by the offices of president and provost with endorsements and cooperation by college governance bodies. Such a council would need wide representation and individual working groups or subcommittees for working in the following areas:

- Policy development and refinement, including assessment of college policies for nondiscrimination on the basis of disability
- Systems and individualized disability information and advocacy
- Accessible teaching through a universally designed curriculum and classroom activities
- Physical and program access through compliant purchasing, new construction, and maintenance
- IT accessibility and usability. In classrooms, labs and staff offices

DRC director and assistant directors, especially, but also other members of the professional staff should participate extensively in Council activities. For that kind of staff participation to occur, however, a more consumer orientation to the review of accommodation requests and implementation of reasonable accommodations across campus will need to be done in a more streamlined manner, with less emphasis on disability documentation and more staff emphasis on determining reasonable accommodations consistent with consumer experience and accommodation history.

Finally, the college should consider purchasing the services of an independent private consultants such as Salome Heyward and Associates (see the website <http://salomeheyward.com>) to help inform and guide the Council, especially during its formation. Services of this kind are relatively inexpensive, but they can clarify responsibilities and suggest policies and practices that can lead to high quality results.

Appendix

Mr. Romboy's six questions with summary responses follow:

Q: Is our approach to service delivery sound? Are there areas we need to build up?

The DRC approach to service delivery is sound and well informed by government regulations protecting the rights of individuals with disabilities and by significant experience and professional and creative skills throughout the staff. However, the rapid growth in the population of students with disabilities at SLCC calls for a streamlined approach to service processes within the office and a greater emphasis on community participation and outreach, especially through a newly implemented accessibility Council as posited in the body of the report.

Q: What should our position be with regard to new student intake? How do we improve it and how do we allocate our time between new applicants and existing students?

The intake process should be streamlined when possible, deemphasizing documentation to demonstrate disability and enhancing the process of documenting the need for services and accommodations, based on a structured intake interview by intake advisors. Returning students should not be required to visit the office for new memos to faculty every semester, unless their accommodation needs should change or they don't have a long-term disability, as confirmed during the intake process. As much as possible, all students should be encouraged to get their information about their rights and responsibilities for the intake and implementation process from printed materials and the DRC website. DRC staff should not spend any more time with students one-on-one than necessary disseminating information and interpreting and explaining policies and practices. , though perhaps group sessions could be scheduled for that purpose. Only rarely should assistant directors review and supersede the work of the intake advisor. Of course, review for quality assurance and correction and staff development is an essential management tool. But assistant directors should not need to be involved with final approval of accommodations and services generally. Finally, DRC should consider publishing deadlines for certain types of accommodation requests in order to prepare consumers that they may experience wait times as they are initiated into the intake process. Publishing deadlines might also reduce risk for the college.

Q: Is the use of our administrative HELP code system appropriate? Can we use it to determine multiple semester accommodation letters (possibly with a revision that does not refer to disability)?

Q: Within the new spirit of ADAAA, what do we do about IEP documentation? Is our Gray Area Documentation guide appropriate?

Let us consider the above two questions as one. The administrative help code and gray area are very useful, especially in their broad interpretation and flexibility. However, when considering requests for

accommodated course tests, the ADAAA requires that considerable weight be given to the accommodation history as documented by an IEP, Section 504 Plan, and other history for purposes of courses and examinations. Certain other kinds of services and accommodations for special education or for the high school educational environment may, of course, not be appropriate for postsecondary education, as confirmed by the US Department of Education. Thus policies and practices for guiding the review of student accommodation requests should be revised to reflect legal changes.

Accommodation memos could certainly be created for multi-semester usage and, yes, use of the word "disability" and other forms of the negative clinical rhetoric of disability can be avoided. The DRC might even consider changing its name to something such as "Accessibility Resource Center (ARC).

Q: Is our staffing level sufficient for the numbers we are serving? What suggestions can you offer?

Considering the rapid increase in numbers of students with disabilities at SLCC, the college should examine staffing levels with an eye toward at least some increase. However, caseloads have grown to the size and accommodation needs have grown to the extent that increasing staff levels, alone, is unlikely to suffice to meet the growing need. The DRC will need to streamline processes, substitute one-on-one face time with electronic communication and student self-help to information and the accommodation process wherever possible without leaving them in the lurch. This should free up time for many members of the DRC staff to concentrate on meeting faculty and staff need for increased assistance and support throughout the campus community.

Q: How can we best forward the universal access issues we raised? Are they appropriate?

The universal access issues raised by the DRC both in the internal review and during the external review team visit are very appropriate. However, it is difficult, perhaps even illogical, to think that a centralized approach to universal campus access and design is even possible. The college should create an accessibility Council with staffing and participation by the DRC to guide the campus in all aspects of disability law compliance and universal design for the benefit of the entire community.

Four topical areas of concern were raised by student affairs executives during the kickoff meeting of the two-day site visit. These four areas are represented as follows, with bullet points, most of which are redundant with materials found in other sections of the report.

Recommendations for SLCC Administration

- Disseminate college wide the administration's support for the fact that disability law compliance is not limited to the DRC but applies to the entire campus.
- Develop and disseminate a campus wide accessibility and reasonable accommodation policy, with a focus on universal design for construction, maintenance, purchasing, curriculum design, and classroom teaching
- Establish a campus wide Accessibility Council/committee with representatives from all divisions—academic, service, and operating. Perhaps the council could be co-chaired by directors of DRC and Risk Management. (See the Conclusion section of this report for additional details.)
- A program and service self-evaluation and transition plan should be prepared campus wide and include all departments.
- Make and enforce a commitment to technology access, with emphasis on purchasing of accessible technology exclusively and training of website

- developers. Inaccessible technologies already in place should be targeted for updating at the earliest opportunity.
- Create or update a policy requiring video captioning and audio description to meet current legal requirements.
 - Acquire and field ergonomic furniture for classrooms as needed to meet reasonable accommodation requests and develop a method for securing and tracking the furniture.

Recommendations for DRC

- The new director should work with administration to erase budget deficits and set the department on firm financial footing for the future.
- The new director should actively seek the administration's support for shifting compliance responsibility from the DRC to residing with the college as a whole.
- Revised disability documentation policy to remove statistical deficit model for accepting LD diagnosis.
- Significantly increase liaison to academic and operating departments—communication, training, collaboration, and advocacy.
- Address growing need for additional space to ensure usability of the office and privacy of disability and other student information, especially on South City Campus.
- Collaborate with Career Services to infuse disability considerations for subject students and track career/placement outcomes.
- Consider whether case management approach to serving DRC consumers is possible any longer.
- Determine a bilateral office/student joint responsibility for faculty notice and solicit cooperation from the college provost for ensuring availability and receptivity of faculty to receive notice.

Recommendations for Other Departments

- Career Services would benefit from training on workplace accommodations in order to aid career counseling for students with disabilities.
- The veterans program needs regular liaison from DRC or assignment of specific DRC advisor for veteran students with disabilities.
- Academic departments should assume more responsibility for testing students with disabilities under accommodating conditions.

Recommendations for Faculty

- Mandatory training for ADA/Section 504 compliance, especially for new faculty.
- Publish statements on all course syllabi referring students to DRC to request reasonable accommodations and providing contact information for receipt of accommodation memos from DRC.
- Describe key information from visually presented materials in the classroom.
- Caption and described video shown in class.
- Training for accessible teaching of online courses.