External Review

University of California San Diego

Access and Inclusion of Disabled Individuals:

* Office of Students with Disabilities (OSD)
* Disability Counseling and Consulting (DCC)
* Physical and Electronic Access Overview
* Campus Culture

Association on Higher Education And Disability (AHEAD)

#

# Background

In keeping with best practices, the University of California San Diego initiated an external review of its access for, inclusion of, and culture relative to disabled individuals[[1]](#footnote-1) who participate in UC San Diego programs, activities, and services. While the interest in an external review initially grew from a desire to learn more about access for students with disabilities, institutional leaders decided to take a wider view and consider all aspects of access and inclusion. Therefore, the review specifically included the Office for Students with Disabilities (OSD) and Disability Counseling and Consulting (DCC) and consideration of the campus’ physical and digital accessibility.

The University contracted the external review to the Association on Higher Education And Disability (AHEAD), the leading professional membership association for individuals committed to equity for persons with disabilities in higher education. Two reviewers with extensive professional experience conducted the external review, which included online constituency surveys, a review of printed and web-based materials, and four-days of virtual interviews.

Stakeholders interviewed as part of the review included students and faculty members, Student Affairs and Academic Affairs administrators and partners, academic leaders, and staff from OSD and DCC. See Appendix A for the interview schedule. The primary goals for the review were to recognize areas in which the institution is excelling, identify areas in which opportunities for improvement exist, and make recommendations for evolving institution-wide efforts at creating disability equity based on best practice standards. Because the principle purpose of a University is student education, the bulk of the report focuses on the student experience.

## Caveats

This report is the result of the external review and is submitted at the request of the administration of the UC San Diego. It is an independent report requested for proactive reasons and not the result of any action against the University. As such, it is a tool, not a binding document. The comments and suggestions contained within are based on AHEAD’s best practice Program Standards of 2021[[2]](#footnote-2) and guidelines in the Rehabilitation Act of 1973, Section 504 and the Americans with Disabilities Act as Amended (2008). Recommendations made in the report are not legal advice.

Although thorough, this type of review has limitations. The information gathered is limited to that which was shared by stakeholders during group and individual interviews or is available as print or web-based materials. While the reviewers’ recommendations are based on national standards and professional experience, they should be evaluated in consideration of UC San Diego’s unique mission, goals, structure, and culture. Furthermore, the review was conducted during the COVID-19 pandemic via Zoom. This meant that the reviewers did not have the opportunity to visit the campus physically, institutional personnel had been working remotely for several months, and students were not on campus. The unusual timing likely had an impact on the information shared and the reviewers’ understanding of how UC San Diego operates during a typical academic year. To recognize these limitations, the report will be most valuable if its recommendations are considered and implemented by a team of UC San Diego personnel who are familiar with the institution and have the authority to act.

# Introduction

All programs, services, and activities offered by an institution of higher education must be accessible to disabled people. Consistent with its decentralized campus structure, UC San Diego has allocated responsibility for various aspects of access to a variety of offices. The roles and directions for individuals seeking services are clearly laid out in the Policy and Procedure Manual policy: UC San Diego Disability Access Guidelines[[3]](#footnote-3):

* The Office of Students with Disabilities (OSD) provides accommodations for students with disabilities and works with faculty to ensure academic access.
* Disability Counseling and Consulting (DCC) works with disabled staff, faculty, and student employees and their supervisors to identify reasonable workplace modifications and accommodations.
* Responsibility for physical access is vested in the units that work with aspects of the physical campus: facilities, grounds, renovation, transportation, parking, etc.
* Accessibility in digital spaces is vested with the staff responsible for the institutional website, online/distance education, technical systems and resources, etc.

The Office for Students with Disabilities (OSD) has existed on campus for over 25 years. Approximately 15-years ago, the office was administratively transferred from Student Health Services to Academic Affairs in recognition of the fact that most requests for accommodations were academic in nature. OSD remains in Academic Affairs today. Although it serves undergraduate, graduate, and professional students, OSD reports to the Dean of Undergraduate Education. The staff of nine consists of the Director, four senior Disability Specialists, a Student Disability Specialist, an ADA Access Specialist, a Support Services Coordinator, and an administrative assistant. The ADA Access Specialist serves as an OSD Disability Specialist half-time and as a consultant to the University on physical and electronic access the other half of his time. Captioning and interpreting services are provided by accredited local agencies and Brailling projects are completed by an out-of-state company. Pre-pandemic, OSD employed approximately 10 undergraduate students each year to assist with tasks such as answering phones, scheduling appointments, and filing. The Director, who has been in the position since 2011, supervises all non-student staff. During the 2019-20 academic year, the office served 1,198 students. Because of COVID-19, the reviewers did not visit campus and so did not have the opportunity to view the physical offices; however, they were told that upon return to campus, OSD will be relocated to a larger, more central suite of offices.

Disability Counseling and Consulting (DCC) reports to the Vice Chancellor and Chief Financial Officer through the Chief Human Resource Officer. The Director has been in the position for four years and leads a team of four: Leave of Absence Consultant, two Disability Management Counselors, and Office Manager. The Director is also the University’s ADA Coordinator. In 2018-2019, the DCC worked with 746 employees. The most common accommodation provided was leave of absence (63), followed by modified work schedule (48) and accommodations related to parking/transportation (37). The team provides disability management and job accommodation consultation services to faculty and staff who have a medical condition (physical or mental) that interferes with their ability to work or return to work. DCC also provides educational outreach, disability management services, job accommodations, networking tips, job interviewing skills, and services for pregnant employees.

This review is the third study of disability access conducted on campus in the last several years. Previous studies have been internal and resulted in a variety of recommendations, including the recommendation for this external review to benchmark UC San Diego against national best practice standards. Several people interviewed as part of this review commented on the fact that the recommendations made in previous reviews have not been implemented. The observation makes them skeptical that this report will be any different. Therefore, the reviewers highly recommend a transparent process in addressing the recommendations made in this report

# Access for Students & OSD

The role of a disability resource office in higher education is complex and comprehensive. Often perceived of as simply a service office for disabled students, the actual role includes not only work with students but significant consultation with course instructors and program administrators, campus-wide collaboration, and technical assistance with the majority of campus personnel. Most offices have primary responsibility for the institution’s compliance with federal and state laws that mandate non-discrimination and access for students with disabilities. The central role, determining whether an accommodation (or other intervention) is appropriate for a given student in a specific context, involves not only understanding the unique impact of disability for the student but also understanding the essential components of the course or program. For example, while it might be clear that a student’s processing speed is slowed by disability or disability-related medication, deciding whether an accommodation is appropriate requires understanding whether time is an essential component of the course or program.

It is important to note at the beginning of this section that at UC San Diego some of the processes that address access for students are not under OSD’s current portfolio. Therefore, recommendations will require a larger institutional conversation. Those conversations may lead to a broadening of OSD’s role, which would require additional resources.

## Strengths

### Staff Experience and knowledge

The Director has worked with OSD for eleven years and held the position of Director for nine years. Her tenure as Director has seen an increase in office staff from two to its current nine staff members, development of comprehensive policies and procedures, and implementation of an electronic database. She is a knowledgeable professional, with expertise in the institution’s legal obligation to provide access for students with disabilities and in the accommodation process. She is a member of the campus Committee on Equity, Diversity, and Inclusion where she can have input on how disability can be a part of the greater diversity agenda on campus. The Director supports staff involvement in national discussion forums and professional development training as time and budget allow. She has developed strong relationships with a variety of institutional stakeholders, and her knowledge is well-respected across campus units.

The OSD staff is likewise knowledgeable, experienced, and dedicated. They work well together as a team and support each other in decision-making around accommodations and in providing support to students and information to faculty. While this review recommends updates in service delivery practices, the staff is clearly interested in student access and success and often works beyond hours to support students. Acknowledging this, campus counsel commented positively on the complexity of the work they do within the confines of the law and their rigorous and thorough processes.

### OSD infrastructure

OSD has clear policies and procedures in place to address the primary responsibilities of a disability resource office as described in AHEAD’s Program Standards, including:

* student and institutional rights and responsibilities
* process for students to self-identify as disabled and seek accommodations
* process for students to implement the accommodations that have been determined to be reasonable
* process to inform faculty of a student’s right to accommodation
* process to involve faculty in determining whether an accommodation is reasonable
* process for students to grieve a decision

OSD staff determines reasonable accommodations based on an individualized, interactive process, as required by legislation and illuminated through settlement agreements and case law. Accommodation decisions are made in regular team meetings to maintain consistency and are based on the principles of reasonableness. The Director is available to assist in complex situations and support staff through difficult decisions and conversations. After decisions are made, they are communicated to faculty via the individualized Authorization for Accommodation (AFA) letter, a process AHEAD’s Program Standards recommends.

OSD has a comprehensive, electronic student record-keeping system that supports staff efficiencies. The recently introduced Student Portal allows students to make their requests for service online each quarter and assists with the process of creating Authorization for Accommodation (AFA) letters for course instructors. The system provides students with ready access to the accommodations available to them and administration with the ability to quickly and accurately review the students who use services and the accommodations they have requested.

OSD’s budget meets both its staffing needs and the expenses related to student accommodations. Accommodations determined to be reasonable should never be delayed or refused based on budgetary limitations, and the full budget of the institution is considered in determining if an expense is administratively burdensome. Per best practices guidelines, OSD can request additional funding should an accommodation exceeded the current budget. The Director and staff report that they feel supported by the administration in providing necessary accommodations regardless of the cost.

OSD staff have been working from home during the pandemic. When they return to campus, they will return to a new suite of offices larger and more centrally located than the one they left. The space is appropriate to meet the operational and privacy needs of the office. In doing external reviews, space and office location concerns are often noted, so it was positive that no concerns related to office space were made during the interviews. This may be due to the review being conducted while staff is and has been working from home for a considerable length of time.

OSD maintains budget for professional development, offers release time, and regularly meets to discuss professional practice and new developments in the field. When a staff member attends a professional development event, he or she is asked to share information with the team and other campus constituents so that the training has a wide impact.

### Collaboration with campus partners

A disability resource office must develop and maintain relationships with a wide variety of campus departments to foster an inclusive campus environment. The OSD Director and staff work closely and collaboratively with staff from Housing and Dining, the Student Affairs case managers, and academic department liaisons. As mentioned, the ADA Access Specialist dedicates half his time to working with campus partners on physical and electronic access. An example of his success in supporting the development of resources for the campus community is the website Planning an Accessible Event.[[4]](#footnote-4)

While the reviewers will make recommendations in support of a more structured approach to outreach for OSD, it is important to acknowledge some of the collaborations currently in place. In addition to other collaborations, OSD staff works with:

* Admissions to provide information for outreach to specific populations, such as veterans with disabilities
* Registrar in support of students who need priority registration as a disability-related accommodation and place accessible or ergonomic furniture in classrooms
* Financial Aid to assist students with disabilities who need additional financial aid to meet disability-related expenses
* Athletics to update their website and ticketing process to make them accessible
* Career Services to provide accommodations for on-campus interviews
* Geisel Library to set up the OSD room that contains various adaptive technology
* The Teaching + Learning Commons to encourage faculty to incorporate universal design when designing new courses or redesigning courses in virtual spaces

## Opportunities and Recommendations

### Purpose/mission

OSD’s website does not include a mission statement for the office. In follow-up interviews, the Director suggested that the tagline, “Ensuring accessibility across campus,” on the Disability Resources website[[5]](#footnote-5) serves as the mission for both OSD and DCC. However, this vision-like statement does not provide the specificity and direction needed to define a “true north” that can guide OSD in focusing its efforts and resources or supporting the campus community in understanding its role on campus.

In completing the Self-Study, that was a part of this review, the Director provided a more defined mission: “The Office for Students with Disabilities (OSD) works with undergraduate, graduate, and professional school students at UC San Diego to review medical documentation and, through the interactive process with the student, determine reasonable academic and non-academic accommodations.” This mission statement is much more guiding, narrow, and descriptive of the office’s current work. It defines an office that works individually, focuses on the disability, identifies need rather than implementing services, and focuses on compliance. The mission does not speak to institutional consultation, system change, diversity, or the student experience. This contrasts with UC San Diego’s mission, as also reported in the Director’s Self Study: “UC San Diego's mission statement is to be a student-centered, research-oriented, service-oriented public university.” The University’s broader, more student-centered philosophy is not reflected in OSD’s work, putting it somewhat at odds with the larger, more welcoming approach students experience across campus.

Increasingly, disability resource professionals nationally recognize that true equity cannot be achieved one student at a time. Exclusive practices are often the result of inaccessible systems and attitudes that require higher-level interventions, consultation, and collaboration. Indeed, AHEAD’s recently revised Program Standards identifies “Leadership & Collaboration” and “Consultation & Information Dissemination” as the first two of the five identified domains of disability resource practice. The OSD staff understands this when they express hope that the review will lead to more campus-wide ownership of access and more concrete evidence that disability is embraced as an aspect of diversity in UC San Diego’s priorities. However, bound to the work that has been defined for them, they also explain that their focus is academic accommodations and that other support is outside their scope of responsibility.

Throughout the interviews with campus stakeholders, the reviewers heard consistent dissatisfaction with the support available to disabled students:

* We need to do more than just meet the legal standards to move toward a vision of inclusion.
* OSD is not about creating community. It’s not about climate, which is what UC San Diego needs based on our mission.

The campus was described as unwelcoming and accessing services as unduly burdensome and simply transactional. Stakeholders stressed the need for support beyond legally mandated accommodations. The suggestion of a second office, perhaps a disability cultural center, to provide what OSD does not came up repeatedly.

There is no legally mandated requirement that colleges and universities do more than provide equal access for disabled students. However, minimum legal compliance is no longer identified as best practice, and the field has evolved its guidance for the work of an effective disability resource office. This means that, although the focus on individual accommodations and compliance currently guiding OSD’s work is not a serious liability, it is also not the current state of the field. As a result, students, parents, and college professionals familiar with other institutions’ services will likely continue to express dissatisfaction with the role OSD is playing on campus. The challenge can be addressed by evolving OSD’s mission or assigning responsibility for support of disabled students’ other needs to another office and/or establishing a disability cultural center.

#### RECOMMENDATIONS:

* Working with a diverse team of stakeholders, review and possibly revise OSD’s mission. Adopting a mission that covers all aspects of disability resource work (determination of disability status and accommodations, accommodation delivery, and system-wide consultation, advisement, and leadership) could set the stage for OSD to redirect efforts to creating a truly equitable experience for students with disabilities, rather than focusing only on eligibility considerations and retrofit accommodations.
* Depending on the mission defined, commit to addressing implications for OSD and/or for other offices. Recommendations in this report will suggest ways in which OSD can modify its practices to free time for staff to concentrate on additional responsibilities. However, it will be important to assess OSD’s resources before expanding its role to ensure the staff can be successful.

The ultimate decision about the role OSD is asked to play on campus can inform its fit within the administrative structure of the institution. Because disability and access touch every aspect of the college experience from residence life to student government to classroom access, there is no “wrong” fit. Rather, institutions will typically make this decision based on where the office can receive the most support either from funding or the personal experiences/interests of an administrator. AHEAD research from 2018 shows that 51.5% of responding disability resource directors report placement in Student Affairs and 24.8% in Academic Affairs. There are certainly examples of effective offices under both structures, and with other alignments.

OSD’s current placement within Academic Affairs is an obvious choice given its focus on students’ academic experiences. However, even within that alignment and with its current focus, the staff work with non-academic issues and graduate students. Both the OSD Director and Undergraduate Dean feel the reporting structure is working well. As such, the reviewers have no reason to recommend a change. However, regardless of whether a change is made in OSD’s focus, they do remind the institution that a college experience is much bigger than what happens in the classroom and barriers that exist in other areas of campus cannot be ignored.

### Process for students to establish the right to accommodations

An important role for disability resource professionals is to engage in an interactive process to understand the disability-related barriers each student faces and determine reasonable accommodations. While the goal of the interactive process is consistent from campus to campus, individual approaches vary greatly. As compared with other campuses, the reviewers find UC San Diego’s processes to be demanding. That is, there is a high standard for the amount and type of documentation required, a high reliance on third-party documentation, the length of time required to navigate the process can be extensive (especially for students who have not used accommodations previously), and many students are required to reestablish their eligibility regularly. Students report that “recertifying” eligibility for services is burdensome, time consuming, and expensive. OSD staff indicated that UC San Diego requires more thorough documentation than community colleges or other common UC San Diego feeder schools; however, provides no explanation of why that is the case. Because UC San Diego’s classes run on a quarterly system, the process can make it difficult for students to get accommodations set up in time for classes to begin.

Most stakeholders interviewed reported either direct experience or hearing about the challenges of disabled students in getting the “proper” documentation to qualify for accommodations. 24% of disabled students who responded to the online survey that was a part of the review rated the “ease of registering with the office and providing required documentation” as “poor.” The following comments from the survey are typical of the many stories relayed to the reviewers.

* It's difficult to have to file for accommodations every 10 weeks and get updated paperwork. We've got enough on our plate. Constantly and repeatedly having to refresh and refile our paperwork is difficult, especially for someone who's already disabled.
* Upon turning in my IEP from high school, the OSD office stated that I needed more tests done to verify my learning disabilities. I could not pay for these tests and was offered no assistance. I was turned away for not being able to pay for testing which I think is very unfair. Since then, I speak to my teachers personally and communicate my needs without the OSD office.
* The experience of disability services was so bad that I gave up and have been living without accommodations instead.

The 2008 ADA Amendments Act rejected a high standard for demonstrating disability and put forth a commonsense standard. While the secondary process of determining accommodations requires a separate analysis, “using diagnostic information as a tool in reviewing requests for accommodation is different than using it for treatment…[requiring] a more limited range, level, and type of information.”[[6]](#footnote-6) With these changes, it is often possible for an experienced disability services professional, such as the OSD specialists, to meet with a student, establish the presence of a disability, and determine accommodations/strategies to remove barriers in a brief amount of time.

Areas of concern the reviewers note with the current process include:

1. OSD’s response to students who have difficulty with the registration process or another aspect of setting up accommodations is to send them a reminder email and extensive checklists of their responsibilities. Staff report frustration that students do not follow the steps but seem to believe that there is nothing they can do about it. Just as barriers exist in the academic environment, disability resource professionals must consider that they may have designed processes that pose barriers for some students and work to alleviate those barriers. This may entail providing support to students as they navigate a process and/or modifying the requirements. However, at UC San Diego Student Affairs Case Managers have had to step in to support students through the OSD process.
2. OSD staff members meet as a team to decide on student eligibility and determine reasonable accommodations. Each staff member individually reviews all information received from students and then the staff meets for two hours each week to discuss them. The staff estimate that they review approximately 30 files a week. If each file takes each of the seven staff members even 10 minutes to review, the weekly commitment of staff time to this process is over 40 hours. Although thorough, reducing the amount of time OSD staff spends on documentation review could free considerable time for other priorities, such as student support and campus outreach.
3. Requiring approximately 50% of students to reestablish their eligibility for services multiple times a year is burdensome and communicates distrust in their use of accommodations or lack of confidence in the original decision. Disabilities are fairly permanent conditions, while symptoms may decrease and students may learn compensatory strategies, the underlying condition is likely still present.
Students who no longer need accommodations tend to not request them.
4. The overall process seems to be contributing to few students identifying as disabled and seeking services. OSD is currently serving less than 3.5% of the undergraduate student population, a much lower figure than we would expect. The U.S. Department of Education, National Center for Education Statistics states that 19% of undergraduates report having a disability[[7]](#footnote-7), while AHEAD research indicates that between 6 and 7% of students connect with campus disability resource offices to seek services.[[8]](#footnote-8)

While the reviewers recognize that OSD’s intention is not to delay students’ access but to be thoughtful, thorough, and consistent in decision-making, the result of its process is that students are often unable to secure accommodations/access during the term when they first make their requests or, worse, avoid the office all together. Considering that OSD specialists report that very few students who request accommodations are found to be ineligible, this high level of scrutiny may not be addressing a real concern.

#### Recommendations:

* Review AHEAD’s Guidance on Using Documentation to Support Accommodation Requests[[9]](#footnote-9) for information on how much of higher education modified its practices following the passage of the 2008 ADA Amendments Act. Modeling this process more closely will relieve some of the current focus on third-party documentation and speed the process, without compromising quality decision-making.
* Reevaluate the practice of requiring recertification of disability from so many students. While the reviewers understand that only about half of the students served are required to recertify, the number of stories shared about this process and the negative impact it appears to be having, make it problematic. Neither reviewer is aware of another institution that has a practice like UC San Diego’s in this area.
* Discontinue making eligibility and accommodation determinations by committee. This would save considerable staff time and show trust in individual specialist’s ability to make independent decisions. Of course, consultation with each other and with the Director should still be encouraged to build skills and collaboration. Some universities use committees as a way of discussing challenging decisions or unusual accommodation requests and to promote consistency in the student experience rather than for all eligibility or accommodation decisions. Staff training should be provided if needed.
* Review the current process to identify ways to make it more user-friendly. For example, are all the questions on the intake form necessary to have in writing, or will they come up in the interactive process if they are important to the student’s individual situation? Can the student check-list, currently a full page, 10-item list, be shortened and simplified? Do students need to request accommodations each quarter or might some of the steps be automated?

### Services for graduate and health science students

The UC San Diego School of Medicine, Skaggs School of Pharmacy and Pharmaceutical Sciences, and UC San Diego Health are vibrant components of UC San Diego yet were not included in the review other than with a cursory mention and by a few individuals affiliated with the programs who attended the open forums. That fact alone stands out as a red flag, indicating that UC San Diego may not be addressing disability access in those programs. The reviewers were told OSD is the resource for health science students with disabilities; however, the reviewers were unable to find any mention of OSD, disability, or accommodations on those webpages. OSD reports serving 178 graduate and professional students out of a total population of 8,839, or approximately 2%, again a much lower figure than would be expected.

Nationally, health science programs have seen a significant increase in the number of disabled students enrolling in the last ten years. Because of the lock-step nature of the curriculum, the number of required clinical and externship requirements, and the very close work with patients, identifying appropriate accommodations in health-related academic programs is challenging and time-consuming. In fact, the area has introduced so many unique dynamics to the disability resource field that a new association, The Coalition for Disability Access in Health Science Education (the Coalition), emerged several years ago. With its roots in the University of California San Francisco’s medical school, the Coalition has put forward much needed promising practices, researched trends, developed resources, and established networking opportunities for disability resource personnel who work with disabled students and their faculty in health-related academic programs.

The reviewers take the time to describe the challenges of providing accommodation in health-related fields to underscore their concern that OSD is not closely involved with those programs and their students. One reviewer recently visited a school similar to UC San Diego where health science students were served out of the mainstream disability resource office. Realizing the complexity of the arrangement, that university reserved a full day of the review for interviews with students and personnel from those programs. The institution has now established a dedicated disability resource office to serve those students in recognition of the time and specialized knowledge required.

Services for graduate students in lecture-based fields is less demanding so will not require as much specialized knowledge as describe above. However, this is another area in need of attention. Again, OSD reports only serving 178 professional **and** graduate students, possibly indicating a dearth of services to graduate students as well. While no interviews were specifically scheduled to address graduate students, the reviewers did hear concerns about the level of services available during the open forums. The online surveys revealed a concern about accommodations for graduate student research (GSR). Specifically, the involvement of DCC in that process can be confusing, and it was reported that funding for interpreting for GSR was not available through OSD and had to be borne by the student’s academic department.

#### RECOMMENDATIONS:

* Begin conversations with administrators, faculty, and staff in the UC San Diego School of Medicine, Skaggs School of Pharmacy and Pharmaceutical Sciences, UC San Diego Health, and the Graduate Division immediately to plan an aggressive outreach to students who may be facing disability-related barriers. The plan should include development of web-based referral information, training, outreach at orientation, and a student voluntary survey to assess need. Its goal should be a strategic plan to implement quality services as soon as possible. If the decision is made to continue that responsibility with OSD, staffing and possible administrative realignment should be considered.
* Ensure preparation of OSD staff to address the needs of health science students. The Coalition has a variety of resources available free of charge for both resource staff and faculty. The seminal text in the area was just published in its second edition and would provide a useful handbook as the office develops services for these students. The extensive experience with health-science programs at the University of California San Francisco offers a system colleague in the work.
* Reconsider the way in which accommodations for graduate student research are determined and funded. As a required part of the degree program, research is clearly a part of the student’s academic experience.

### accessible student assessment / Test accommodations

OSD is not charged with coordinating the logistics of test accommodations, e.g., extended test time and reduced distraction test environments. Rather, OSD specialists review documentation, make recommendations for accommodations during exams, and inform departments so that the department can arrange separate test administration for the student. To facilitate the process, OSD had identified “liaisons” within each department who receive information about OSD and act as support for faculty in arranging for test space and proctors. There is wide variance in the number of students who use test accommodations in each department and in the resources available to the liaisons. As a result, accommodated testing works well for some students and faculty and not so well for others.

While the reviewers did not have a specific interview time with the OSD departmental liaisons, several joined the open meetings. They shared their experiences: challenges of locating testing space, minimal training, and satisfaction in supporting faculty with disabled students. One liaison explained that 95% of her job has become handling accommodation issues. Several others in attendance asked questions about the liaison program: “Does my department have one?” “How can we get one?” “Is there a list?” While it is clear from these conversations that the liaisons are valuable in supporting accommodation delivery, it is less clear that they have the support or resources they need to do it well. The reviewers were told that funding was provided to departments to support access for disabled students several years ago; however, it appears that in most cases the funding was absorbed into departmental budgets rather than being earmarked for accommodations or accommodation coordination.

Responding to the online survey that was part of the review, 79% of the 67 faculty members rated the need for assistance in administering exams with accommodations as “important” or “extremely important.” 43% of those same faculty reported being “not satisfied” with the assistance they receive. Removing the faculty who selected “N/A” in their response to the question about need, the unsatisfied percentage increases to 59%. To a more generalized question asking if faculty have “ready access to the resources I need to provide effective accommodations to students with disabilities,” 52% of respondents disagree. A few quotes from the survey further illustrate the issue:

* My biggest pain point with OSD is the fact that a large number of students are given 'Take exams individually' or 'Take exams in small groups,' but I have a finite number of TAs to proctor exams. If I have three people on the instructional team, and four people with 'take exams individually,' I'm completely up a creek, and this is a \*very\* common accommodation.
* Maybe a centralized sound isolated recorded testing center where I can send people to take the exam that is staffed late into the evening. The resistance you get to OSD is not that we do not think students deserve equity, but [once] it is granted, we are told to figure it out... thanks. So, do we wince when we see OSD forms? Yes, but it is because we have to do a lot with very little.
* [We need] centralized testing unit for OSD that removes responsibility of coordinating exams with students, staff, faculty, grads, etc. from the individual departments that are starved for space, staff, time, and resources.

The reviewers understand that the issue of space/service for the delivery of exams with accommodations has come up previously. There are arguments to be made for and against such a service. It is not uncommon to see disability resource offices that include test accommodation centers dominated by test administration. In the reviewers’ experience, the adage “build it and they will come” is very true with this service. However, faculty members and students at those schools also can depend on a near-seamless process. The central question is whether disabled students have equitable test experiences and/or effective accommodations, not how those are achieved. Administrators told the reviewers that to move forward with in creating a test center, they would need more data. This is a very wise posture as the commitment would be significant. Because of the current decentralized state of accommodated testing, the reviewers do not have the data to share but are sensitive to concern across campus about the effectiveness of the current situation.

Recommendation:

* Establish a working group on accessible testing, including faculty, the OSD Director, OSD liaisons, an administrator, and a student, to identify problems with the existing system. Effective student assessment is an academic issue; however, the reviewers perceive that the issue has been left to OSD and departments to solve individually without collaborative support or a sustainable plan. As part of the UC system, asking disability resource professionals from sister campuses to share their experiences could be valuable. Some disability resource offices are partnering with curriculum designers to support faculty in using non-traditional student assessments that require fewer accommodations, and the growth of online testing offers additional options..

### OSD Operations

#### osd Staffing & organizational structure

By most measures OSD appears to be appropriately staffed for its current work. Serving 1,198 students with nine staff puts its staff to student ratio at 1:133. While the ranges were quite large, AHEAD research[[10]](#footnote-10) from 2018 found that the average staff to student ratio reported by respondents was 1:164. and that 50% of respondents believe an ideal ratio is between 101 and 300 students per staff member. Significantly, no OSD staff mentioned that there was an immediate need for more staff, and the reviewers did not hear that from other stakeholders either.

That said, this review uncovers two areas which indicate that OSD may not be serving the number of students it would if the recommendations in the report are implemented: the small percent of UC San Diego students currently working with OSD and OSD’s minimal work with professional and graduate programs. As noted, as the office implements more user-friendly processes and reaches out to health-science and graduate programs, the reviewers recommend attention to its staff’s workload and preparation.

OSD currently has a flat reporting structure, meaning that the Director supervises all eight employees. While this is not a problem in and of itself, a structure that allows for the development of smaller teams of professionals and that provides the Director a sounding board can be more supportive. Freeing the Director from the level of supervision she now has would also free her for planning and outreach across campus. The reviewers did not observe much strategic planning, development of resources, or assessment activity within OSD. Being able to share leadership duties might provide more opportunity for those missing priorities.

A common organizational structure in disability resource offices is to name an assistant director, who is usually one of the specialist staff with significant experience in determining accommodations and working with faculty to lead that team. The Director then supervises the assistant director and operations staff, and the Assistant Director supervises the specialist team.

Staff were cooperative and revealing in their interviews. However, the reviewers noted a significant lack of morale. As mentioned earlier, they are knowledgeable and committed, but they also sound dispirited and unsupported. They express frustration with students not following processes, with faculty providing accommodations that are not identified in letters of accommodations, by the institution for not prioritizing disability, and by feeling like they are “in this alone.” When asked what they hoped would come from the review, their answers shaped various dimensions of futility.

It is difficult to make a specific recommendation for addressing this, but most of the recommendations in the report will require OSD staff’s involvement and efforts. They must understand that the problems uncovered are not of their making and that the institution recognizes their efforts to work within a system that has not been nimble. Opportunities for the staff to participate in considering recommendations made in the report and to be listened to and respected are important.

##### RECOMMENDATIONs:

* + Consider developing an Assistant Director position to allow for upward mobility of staff and more time for strategic planning and outreach for the Director.
	+ As recommendations in this report are implemented, attune to the needs of the staff, including the Director. Consider the number of students to be served, staff expertise, workload given an increase in outreach activities, and involvement in planning as recommendations are implemented. Provide Demonstrate university commitment to and support of access to boost staff morale.

#### OSD language and Communication

In large part, disability resource offices’ language choices set the tone for how students experience the campus and how faculty perceive students through the language they use. OSD tends to use older, compliance based language in its conversations and other forms of communication. One example is the common use of the term “functional limitations” to describe the impact of disability. While this is the language in the law and in professional conversations, it can be off-putting and negative when used with students and faculty members. Explaining to students that you are interested in understanding how their disabilities impacts them in the classroom or, better, what they find difficult and then tying it to disability through conversation feels much more welcoming than asking what their functional limitations are. Telling students and faculty that you need to “engage in an interactive process” is likewise stilted and unwelcoming when the goal is to simply to talk with the student to understand the barriers the student is facing.

OSD strives to be clear, thorough, and helpful in its student communication, especially as it experiences students who do not follow established processes. For example, students are given a printed reminder of their steps in obtaining accommodations, and a similar list is posted on the website. The list is a full, single-spaced page with bold, underlining, and exclamation marks. The reviewers have no doubt that these resources are provided in an effort to support students; however, their length and format can make them overwhelming and difficult to process, especially for students with some types of disabilities.

An example:

#3. To **confirm** your accommodations for exams/quizzes, contact your Instructor/OSD Liaison **at least 72 university business hours, excluding holidays and weekends, (3 business days) in advance**. Unless there are extenuating circumstances, your Instructor/OSD Liaison should already be aware of your accommodation needs because you followed the directions in Item #1! Instructors and departments: be advised that if a student makes a request for exam/quiz accommodations within less than 72 university business hours and you are able to provide accommodations, then you need to do so.

An option:

#3. Remind your instructor and OSD Liaison 5 days before each exam. You may not be able to use accommodations for the exam if you do not meet this deadline.

* + - *The time is extended to 5-days to cover weekends.*
		- *The information for faculty is removed because this communication is directed to students.*

In the reviewers’ experience, not only do lengthy instructions prove challenging for students with a variety of disabilities, but most students won’t read long emails. Keeping information short and to the point will mean that more students will read and comprehend the information.

Forms provided for evaluators to use in documenting students’ disabilities are likewise cumbersome and include questions that are unnecessary for determining reasonable accommodations. For example, the form used to document ADHD and Psychological Disorders asks whether the student has attempted suicide and is compliant with treatment plans and medication protocols. The answers do not inform academic accommodation decision-making. If these forms were pared down, they would be easier for evaluators to complete, and OSD would not have inappropriate information that is only FERPA protected in its files. Documentation forms should only request information necessary to determine eligibility and identify accommodations.

The OSD’s website includes very little information for faculty members. While some UCSF videos are linked, additional resources would help to guide both faculty and OSD liaisons. For example, information on the role of the Faculty Advisory Committee and Academic Liaisons could supplement the list of members of each group. Likewise, including process information and other information about accommodations would be helpful. As summarized by one survey respondent, “I would like to have easy access to resources online that I can access without having to have a one-on-one consultation with OSD.”

##### RECOMMENDATIONS:

* As an OSD team, review language used with students and faculty with an eye to welcoming students, encouraging faculty interactions, and framing disability as a valuable aspect of the campus community.
* Review and revise the OSD website and written materials to add additional resources in clear, simple language.

# Access for University employees- DCC

Access for employees with disabilities is addressed by Disability Counseling and Consulting (DCC), a division of Human Resources. This is a common placement for services for disabled employees in higher education institutions across the country. At UC San Diego, as at most colleges and universities, accommodations for staff are often straightforward. Accommodations for faculty members are more complex because faculty positions can vary so greatly throughout a calendar year. Likewise, teaching and research roles are often flexible and not well-defined. As a result, it can be difficult to clearly identify the essential components of any given position. In addition to working with full-time employees with disabilities, DCC is responsible for determining accommodations for graduate students who have teaching or research responsibilities.

## Strengths

The DCC Director and staff are knowledgeable, dedicated, and professional. The work they do is challenging and nuanced, so they approach it collaboratively and with flexibility. They are familiar with the primary national resource for identifying accommodations in the workplace, the Job Accommodations Network (JAN), and use it regularly. The majority of stakeholders spoke very positively during the interviews about their experiences with DCC and what they had heard about services.

To understand the unique requirements of each position, DCC staff members work closely with the employee seeking accommodations and with his or her supervisor. UC San Diego has Human Resource Managers in most departments who extend DCC’s reach across campus. These staff members often resolve issues at the local or college level and only reach out to DCC with difficult issues. As necessary, DCC staff members collaborate with academic leadership and OSD staff. The reviewers were told that most departments are flexible with all their employees, providing ergonomic desks, computers with carpal tunnel support, and flexibility for childcare. As a result, disability accommodations often are met through the same informal process and don’t reach the level of an official request for disability-related accommodations. HR Managers report that DCC has become more responsive since the current Director assumed her role and report that DCC provides effective communication and follow-through.

In addition to DCC’s work, UC San Diego provides resources for ergonomic self-evaluation, personal recommendations, and training. The EH&S Ergonomics Resource Fund[[11]](#footnote-11) can be used to pay for equipment for ergonomic support for employees. This kind of support can help prevent injury and lost time, as well helping employees return to productivity more quickly after injury.

The DCC Director reported that the majority of recommended accommodations for employees are accepted by the employees’ departments. Therefore, most accommodations are put in place seamlessly.

UC San Diego’s Blink[[12]](#footnote-12) website includes extensive, clear guidance for employees seeking accommodations and their supervisors. A comprehensive list of resources about disability and accommodations, as well as information on training options, is similarly helpful.

## Opportunities & Recommendations

It is concerning that the cost of accommodations falls primarily to individual departments. Although many accommodations have little to no cost, some can be cost prohibitive, especially for departments with small budgets. This means that some departments will either not provide necessary accommodations, provide accommodations with great difficulty, or attempt not to hire individuals they perceive as having high cost accommodation needs. During the interviews, the reviewers were told about an automatic door opener that was needed for an employee, but the purchase was delayed because of its cost. Others in the department were reported as becoming resentful about the amount of money being spent on “one employee.” Other stakeholders mentioned the hesitation staff members feel in making requests because they don’t want to burden their departments.

Funding accommodations for graduate student research may be an even bigger problem. Although research is an integral part of graduate programs, the GSR part of the student experience is treated as an employee issue, separate from OSD funding. Graduate students work with DCC, needing to establish eligibility all over again and arrange for accommodations through a different system. To quote from the surveys, “This resulted in mass confusion and frustration for the student (and our department). In the end, we figured out a way to work with OSD, but all the accommodations for the GSR had to be paid by the department, which was a very substantial, unexpected cost.” This potential financial burden can discourage acceptance of disabled students.

The number of employees DCC works with has grown. As employees experience long-term COVID impact, the reviewers anticipate the number and complexity of requests for accommodation from employees may grow significantly. The field is just learning about the impact of COVID, but expectations are that they may require more nuanced consideration and creativity. As the university continues to reopen, there may be a need for an additional staff member to assist with this work.

While the Blink website[[13]](#footnote-13) has excellent information, several stakeholders mentioned that much of what DCC does is not well known. Of note, research shows that faculty members are often reluctant to disclose disability for fear that it will impact their ability to get tenure or have a negative impact on their research or academic careers. As such, a specific strategy for reaching faculty members about the confidential nature of working with the DCC may be necessary.

When asked about a grievance procedure for employee accommodations, the Director indicated that there hasn’t been a need for a grievance because they have been able to use the interactive process to determine accommodations that have been reasonable. Although that is commendable, it is best practice to advertise the grievance process in a readily accessible location for staff. This could be done with a link to the Blink website grievance information.[[14]](#footnote-14)

##### RECOMMENDATIONS:

* Establish a centralized fund to assist departments in covering the cost of employee accommodations when necessary. Having ready access to funds that ensure access for disabled employees sends the message that they are valued by the institution and not a liability to their individual departments.
* Fund accommodations for graduate student research from the OSD budget. This may involve a closer working relationship between OSD and DCC staff in regard to graduate students, which would help to smooth the student experience.
* Share information about DCC when onboarding new staff members and through periodic (possibly at the beginning of the fall quarter or in January) email reminders. Work with the Academic Affairs and possibly the Academic Senate to specifically target information to faculty members. Incorporate questions about access and disability in any planned faculty surveys.
* Monitor DCC staff workloads and increase staffing when necessary.
* Provide easy to locate information on the DCC website for how to file a grievance and make sure that employees working with the office have access to that resource.

# Campus Accessibility: facilities, technology, culture

In addition to addressing access at the individual level, institutions of higher education have an obligation to remove barriers in all aspects of their work, including in the built and digital environments. As with other aspects of access, legal standards guide this work. However, the law establishes only minimums. In other words, institutions can go beyond what they are required to do and look for ways to anticipate and welcome individual with disabilities. During the interviews, many UC San Diego stakeholders expressed interest in creating a campus culture that is both compliant and welcoming to students, employees, and campus guests with disabilities.

## ADA Coordinator

Most higher education institutions are required to have an ADA Coordinator, the person identified as having overall responsibility for attuning to ADA compliance. As this report has made clear, the breadth of institutional obligations for access is extensive, and an ADA Coordinator should have University-wide influence, including policy development and planning. The position requires interpretation and judgment when considering appropriate action and consequences and handles diverse and complex issues, with decisions guided by overall goals and objectives. The scope of responsibility includes faculty, staff, and student employment, as well as public and student access to programs and facilities. The ADA Coordinator also plays a critical role in the successful implementation of the university's Information and Communications Technology Accessibility Policy.

The DCC Director serves as UC San Diego’s ADA Coordinator. UC San Diego is one of only two UC campuses that does not have a full-time ADA Coordinator. Several stakeholders commented on this during the review and expressed concern about the workload it puts on the DCC Director. Given the decentralized nature of disability access work throughout campus, the reviewers recommend a dedicated ADA Coordinator.

##### RECOMMENDATION:

* Develop a full-time ADA Coordinator position. This position typically reports to a Vice President of Compliance, Diversity and Ethics or similar area. The ADA Coordinator should be responsible for developing, revising, and coordinating implementation of University policies and procedures relating to persons with disabilities, tracking university progress relating to its policies and procedures, and state and federal laws relating to persons with disabilities (ADA, Section 503/504, Fair Housing, etc.), filing all necessary reports, and providing technical assistance to University units and offices.

## Physical Access

This review is not an audit of the physical accessibility of the campus. If the institution were interested in that, numerous consultants are available to provide complete information on UC San Diego’s physical accessibility relative to the ADA Accessibility Guidelines (ADAAG), complete with information on door sizes and weight requirements, counter heights, and other detailed measurements. However, the reviewers were asked to comment on the institution’s overall status regarding physical access and had the opportunity to speak with administrators and staff from Resource Management and Planning, Facilities Management, Design & Development Services. Because the review was conducted remotely, these observations are based only on stakeholder interviews and information shared via the online surveys.

### Strengths

As summarized by one of the stakeholders, “ADA is an essential part of our work, not an afterthought.” New construction is reviewed throughout the design and construction processes, and a portion of renovation projects are set aside to address barriers in the “path of travel,” as required by ADAAG. The reviewers were told that the progress UC San Diego enjoys today is the result of ten years of efforts.

The ADA Title II Committee brings together institutional stakeholders to discuss physical access. The Committee meets regularly to identify projects or concerns and problem-solve collaboratively. The team works to address projects as they come up and has established a routine flow. The OSD Director and the ADA Coordinator are both members of the Committee and can bring student and employee concerns to the Committee for discussion and to plan remediation. Positively, members of the Committee who spoke with the reviewers are familiar with the concept of universal design and discuss it as they work with customers. The Director of DCC/ADA Coordinator has recently started receiving blueprints to review.

#### Opportunities and Recommendations

The knowledge and commitment to meet ADAAG requirements that were expressed in the interviews lead the reviewers to believe that a full accessibility audit is not necessary at this time. However, during the review, stakeholders called out specific areas of campus that pose physical barriers. This would be true on any campus and underscores the importance of continued attention to access from facilities and grounds units and the ADA Title II Committee. The number of concerns expressed about access in the health science buildings, especially in the public restrooms, should be noted. Considering the populations served there, the medical centers may need a more thorough review of compliance with ADAAG requirements and assessment of the usability of spaces.

When asked who handles issues with physical accessibility on campus, stakeholders had a variety of answers. It appears that when there is an access issue, someone will usually get it taken care of, but if there were more clear lines of responsibility, the ease of getting things done and the assurance that they will get done could improve. As mentioned previously, a dedicated ADA Coordinator would be very beneficial in the physical access area. The ADA Coordinator could collaborate with the various units responsible for physical access, develop priorities, and track progress. A centralized fund managed by the ADA Coordinator to address immediate, individual access needs could speed response time for those issues.

While the reviewers saw evidence of knowledge and attention to accessibility, usability and legal compliance are two different things. For example, ADAAG sets a standard for the weight of doors so that they are accessible to those with limited strength but does not require automatic door openers on all external doors even though they would be beneficial to many individuals. To address this reality, many campuses choose to build more demanding accessibility standards into their design specifications than those required by ADAAG. One such institution is the University of Arizona. Its Design and Specification Standards[[15]](#footnote-15) includes proactive efforts to build a beyond compliance and could serve as a model if UC San Diego chooses to enhance its physical accessibility.

##### RECOMMENDATIONs:

* Create an online form to report physical access barriers so that students, faculty, staff, students, and campus visitors can report barriers they encounter on campus. Stakeholders seemed hungry to share their observations of accessibility barriers with the reviewers. Establishing an easy to use portal to report barriers would both signal an interest in their experiences and in improving campus access.
* Charge the ADA Title II Committee, under the leadership of the ADA Coordinator, with responsibility for addressing identified barriers and planning for their removal.
* Create a priority list of areas of campus that need attention, including the medical centers, and document progress in making improvements.

## Electronic Accessibility

Digital access, or accessibility of all Information and Communication Technology (ICT), is a major focus in higher education nationally and, since 2005, the area of numerous federal complaints. Broadly defined, ICT includes, but is not limited to, websites, online learning environments, course management systems, electronic books and documents, search engines and databases, classroom technology and multimedia, information kiosks and transaction machines, multifunction office machines, videos, software, and applications procured, developed, maintained, and used by the institution. Accessible means that “a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.”[[16]](#footnote-16)

Office of Civil Rights Dear Colleague letters, court decisions, and settlement agreements have usefully provided a blueprint for action for higher education institutions in working to ensure ICT accessibility:

* Designate a person responsible for ICT access; define roles & responsibilities
* Establish an ICT Accessibility Working Group
* Adopt WCAG 2.0 level (AA standard) and audit (minimally, as WCAG 2.1 is now available)
* Train faculty, staff, and administrators
* Develop procurement practices
* Plan for equally effective alternative services when access is not technically possible and
* Ensure accessible instructional materials (AIM).

Most colleges and universities, like UC San Diego are still evolving in this area, with varying levels of accomplishment and need.

## Strengths

* System-wide commitment: “The University of California is committed to providing an electronic environment that is accessible to everyone, including individuals with disabilities.” The webpage, which comes from the Office of the President of the University of California, also includes information on standards, best practices, procurement, and resources for both web designers and content developers. The system-wide Electronic Accessibility Committee includes representatives from every UC campus.
* OSD’s commitment to electronic accessibility through funding part of a position dedicated to supporting efforts related to electronic accessibility.
* The Accessibility Committee is made up of interested, committed volunteers from a variety of areas who come together regularly to share ideas, information, and strategies. Members of this voluntary committee are very knowledgeable and passionate about access. The committee is in the process of developing a website with information about electronic accessibility.

## Opportunities & Recommendations

Although the Accessibility Committee members themselves are passionate about accessibility, there appears to be less commitment to the work from the administration. The committee members jobs descriptions do not include this work, and the staff members have limited time to dedicate to it. The reviewers were told that on the UC San Diego campus, there are no full time positions dedicated to ITC.

Many universities have at least one full-time position, typically located in the Information Technology unit, who is responsible for monitoring electronic accessibility and training others on their responsibilities in this area. This person should be designated as the ICT or Electronic and Information Resources (EIR) Accessibility coordinator. There are many good examples of this work, including Texas A&M University IT accessibility website.[[17]](#footnote-17)

##### RECOMMENDATIONs:

* Continue to build on the good work of the Accessibility Committee and complete the website providing information about web accessibility for the campus community.
* Create an ICT/EIR Accessibility Coordinator position within the Information Technology area to provide full-time consulting on accessibility across campus, ensure compliance with federal laws and regulations, and promote accessibility on campus.

## Campus Climate

Increasingly, the accessibility of a university is measured in terms of how responsive it is to “difference.” Is disability anticipated and valued, or do numerous barriers exist for those who access information and spaces differently? Summarized, how different is a disabled person’s overall experience from that of a non-disabled person? While the quality of accommodations, the accommodation process, and the experience of disclosing as a person with a disability are important, they are necessary because an underlying system is inaccessible.

Traditionally, campuses have thought about access through a legal lens, primarily considering compliance and accommodation as the paths to access. This concentration leads to a culture focused on a reactive, individual approach and perpetuates an othering of people with disabilities based on differential treatment. An alternative approach frames disability as an aspect of diversity and encourages proactive design of systems that are accessible to most people without the need for modification. Access is emphasized as a civil right, and a welcoming, accessible culture is encouraged as an aspect of social justice. The route to this more intentional, expansive access is often through universal design (UD). UD is defined as the design of buildings, products, and environments to make them as accessible as possible to all people, regardless of age, disability, or other factors, without the need for modification. Aimed at addressing the widest set of needs, UD improves the user experience for all and is sustainable.

Throughout conversations about more concrete aspects of access, the issue of culture came up repeatedly. A troubling number of students, faculty, and administrators shared the perspectives that UC San Diego is more interested in not getting sued than in access and makes access difficult for its disabled constituents. However, positively, many also expressed interest in UC San Diego becoming more seamlessly accessible and giving more attention to the spirit of the law than the letter of the law.

Both the OSD and DCC indicated that they provide outreach and training for anyone who requests it. As this training continues, reviewing the information that is provided and how disability is viewed in the training is important. Training should focus on the shared responsibility for access and disability as a component of identity. Collaborating with other units on campus like the Teaching + Learning Commons can help strength those relationships and buy-in. One example of such training is the Aggie Disability Awareness training at Texas A&M.[[18]](#footnote-18)

The topic of a Disability Cultural Center was discussed in almost every interview during the review. Such centers are still fairly new on most campuses, and the reviewers are not aware of research indicating that such centers have an impact on campus climate. In the opinion of the reviewers, the issues raised in this review and implementing the recommendations will make positive changes in the view of disability and the university’s approach to disability. The reviewers would never want to discourage the development of a cultural center; however, the first priority should be addressing the recommendations in the report. Concrete plans for the development of a cultural center are aspirational.

##### RECOMMENDATIONS:

* Take measures of campus climate to understand how disabled people are experiencing the campus. An important first step in looking at improving the overall culture is to understand it through first-person experiences and recommendations. If there are plans to assess climate overall, ensure that a demographic question on disability is included so that data can be analyzed to understand whether people with and without disabilities are having significantly different experiences.
* Create a webpage that pulls all information on access and disability-related resources together and link it in the main institutional footer.[[19]](#footnote-19)
* Pursue adding a chapter of the national student group DREAM[[20]](#footnote-20), to provide an opportunity for students with disabilities to create community, understand activism, assume leadership positions, and develop positive perspectives of disability.
* Add disability to the list of curriculum requirements designed to expose students to issues of diversity that already includes gender and race/ethnicity.
* Consider creating a disability culture center on campus similar to the other culture centers that already exist.
* Engage the institution with disability studies scholarship. Many of the concepts discussed in this section of the report come from disability studies, an academic discipline like African American studies and queer studies that pursues knowledge about disability from a cultural, historic, political, and economic lens.

# Conclusion

UC San Diego staff, faculty, and administrators who were interviewed for this review are clearly interested in providing an equitable experience for students and other members of the campus community with disabilities. There appears to be a disconnect between the desire for an accessible, inclusive, and welcoming environment for disabled individuals on campus and the experience that many of those individuals report having (particularly students). The staff with primary responsibility for access (OSD and DCC) are knowledgeable; however, they generally reported that all access issues are referred to their offices with a lack of shared responsibility. On the other hand, there are many individuals with knowledge about disability and access across campus who provide access in a variety of settings, but it was reported that this is often not an organized system, but rather just “knowing” who to ask, and someone will do what needs to be done.

Both physical accessibility and electronic accessibility appear to be adequate, although more intentional focus on these areas is recommended. Creating both a dedicated ADA Coordinator and an ITC/EIR Coordinator will reduce risk for the university and allow the OSD and DCC more time for training and outreach to the campus community. Overall, more intentionality, clarity, and transparency about who is responsible for various facets of access would ease the process of requesting accommodations and reporting access challenges.

Overall, the climate of UC San Diego for disabled individuals has room for improvement. There are many individuals committed to access who lack specific direction to move the campus forward. By coordinating efforts and expanding the focus of the OSD beyond strict compliance, UC San Diego will improve the campus climate.

The reviewers appreciate the opportunity to get to know members of the UC San Diego community and are grateful for the hospitality and warmth extended by the OSD and DCC Directors and campus administrators. They remain available for consultation.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Meeting Description** | **Time** |  | **Meeting Description** | **Time** |
| **Monday, January 25, 2021** |  | **Tuesday, January 26, 2021** |
|   |   |  |   |   |
| OSD & DCC Directors | 9:00- 9:50am |  | Teaching + Learning Commons | 9:00- 9:50am |
| Physical Access | 10:00- 10:50am |  | OSD Staff | 10:00- 10:50am |
| College Provosts | 11:00am- 11:50am |  | Campus Council | 11:00am- 11:50am |
| ***LUNCH BREAK*** |  |  | ***LUNCH BREAK*** |  |
| Colleges- Deans & OPAs | 1:00- 1:50pm |  |  |  |
| AS and GPSA  | 2:00- 2:50pm |  | DCC Staff | 2:00- 2:50pm |
| Open Student Meeting | 3:00- 4:00pm |  | Open Staff Meeting | 3:00- 4:00pm |

Appendix A: Review of the Disability Experience at UC San Diego Meeting Schedule

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Meeting Description** | **Time** |  | **Meeting Description** | **Time** |
| **Wednesday, January 27, 2021** |  | **Thursday, January 28, 2021** |
| VCEDI & VCSA | 8:00- 8:50am |  |  |  |
| Executive Vice Chancellor | 9:00- 9:50am |  | Disability Faculty Advisory Committee  | 9:00- 9:50am |
| Digital Access | 10:00- 10:50am |  | AVC Resource Administration | 10:00- 10:50am |
|   |   |  | Dean of Undergraduate Education | 11:00- 11:50am |
| ***LUNCH BREAK*** |  |  | ***LUNCH BREAK*** |  |
| Chief HR Officer  | 1:00- 1:50pm |  | Final Briefing | 1:00- 2:00pm |
| Grad Division Leadership | 2:00- 2:50pm |  |   |   |
| Open Faculty Meeting | 3:00- 4:00pm |  |   |   |

1. The descriptors “individuals with disabilities” and “disabled individuals” are used interchangeably in this review in recognition of the reality that this terminology is still unfolding. While professionals in disability services have advocated use of “person first language” (person with a disability) for some time, many disabled scholars and activists prefer “identity first” (disabled people) language. [↑](#footnote-ref-1)
2. <https://www.ahead.org/professional-resources/information-services-portal/data-collection-and-management/performance-indicators> [↑](#footnote-ref-2)
3. [http://adminrecords.UC San Diego.edu/ppm/docs/200-9.html](http://adminrecords.ucsd.edu/ppm/docs/200-9.html) [↑](#footnote-ref-3)
4. [https://blink.UC San Diego.edu/\_files/HR-tab/disability-benefits/accessible-event-planning-guide-march-2018.pdf](https://blink.ucsd.edu/_files/HR-tab/disability-benefits/accessible-event-planning-guide-march-2018.pdf) [↑](#footnote-ref-4)
5. [https://disabilities.UC San Diego.edu/](https://disabilities.ucsd.edu/) A single webpage portal to OSD and DCC. [↑](#footnote-ref-5)
6. From AHEAD’s best practice document Supporting Accommodation Requests: Guidance on Documentation Practices. <https://www.ahead.org/professional-resources/accommodations/documentation> [↑](#footnote-ref-6)
7. Data from the most recent Student with Disabilities report, 2015-16 school year: <https://nces.ed.gov/fastfacts/display.asp?id=60> [↑](#footnote-ref-7)
8. AHEAD 2018 Biennial Survey Report: <https://higherlogicdownload.s3.amazonaws.com/AHEAD/38b602f4-ec53-451c-9be0-5c0bf5d27c0a/UploadedImages/Information_Portal/Benchmark_Data/2018_AHEAD_Biennial_Survey_Report.pdf> [↑](#footnote-ref-8)
9. <https://www.ahead.org/learn/resources/documentation-guidance> [↑](#footnote-ref-9)
10. Disability Resource Professionals and their Individual Work with Students A Survey Report from the Association on Higher Education and Disability [↑](#footnote-ref-10)
11. [https://blink.UC San Diego.edu/safety/occupational/ergonomics/fund/index.html](https://blink.ucsd.edu/safety/occupational/ergonomics/fund/index.html) [↑](#footnote-ref-11)
12. [https://blink.UC San Diego.edu/HR/services/support/disabilities/accommodation/faculty.html](https://blink.ucsd.edu/HR/services/support/disabilities/accommodation/faculty.html) [↑](#footnote-ref-12)
13. [https://blink.UC San Diego.edu/HR/services/support/disabilities/accommodation/faculty.html](https://blink.ucsd.edu/HR/services/support/disabilities/accommodation/faculty.html) [↑](#footnote-ref-13)
14. [https://blink.UC San Diego.edu/HR/supervising/conflict/about/formal/filing.html](https://blink.ucsd.edu/HR/supervising/conflict/about/formal/filing.html) [↑](#footnote-ref-14)
15. <https://pdc.arizona.edu/dssarchive/rev8/00000%20C12%20Tab.pdf>. [↑](#footnote-ref-15)
16. The Offices for Civil Rights of the U.S. Department of Education and Department of Justice f*rom* Office of Civil Rights resolution agreements, including University of Cincinnati Resolution Agreement OCR Compliance Review #15-13-6001, December 2014: 2. [↑](#footnote-ref-16)
17. https://itaccessibility.tamu.edu/index.php [↑](#footnote-ref-17)
18. https://cdd.tamu.edu/service-outreach/aggie-disability-awareness/ [↑](#footnote-ref-18)
19. An example is available at the University of Arizona’s website: <https://www.arizona.edu/> See “Accessibility” in the footer. [↑](#footnote-ref-19)
20. DREAM advocates for student rights, increased accessibility, social and policy change, and aims to provide support and mentorship to local campus disability groups and individual students.  We hope to empower students with disabilities to work for local and national change, encourage the development of disability culture and peer support, and advance the study of disabilities within academia. <https://www.dreamcollegedisability.org/> [↑](#footnote-ref-20)