### UNIVERSITY OF CALIFORNIA

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

OFFICE OF THE VICE PRESIDENT - GRADUATE AND UNDERGRADUATE AFFAIRS AND VICE PROVOST - EQUITY, DIVERSITY AND INCLUSION

OFFICE OF THE PRESIDENT 1111 Franklin Street Oakland, California 94607-5200

February 20, 2024

### ACADEMIC COUNCIL CHAIR STEINTRAGER

### Dear Chair Steintrager:

Enclosed for systemwide Academic Senate review is the final report of the University of California Systemwide Advisory Workgroup on Students with Disabilities. In 2021, then-Provost and Executive Vice President Michael Brown charged a workgroup of subject matter experts, faculty, and students with examining the current student experience and formulating recommendations for policies, programs, services, and campus culture to better support students with disabilities. The workgroup's report is the first-ever, comprehensive record of the experiences and outcomes of students with disabilities at UC.

The recommendations in this report are organized for three audiences—Regents, University leaders, and faculty members—and aimed at improving the experience of students with disabilities on UC campuses. We seek the Academic Senate's input and advice on the Workgroup recommendations for faculty, most notably feedback on and plans for addressing the recommendation specific to Senate Regulation 778 and divisional grading policies and procedures.

As the recommendations move forward into the adoption and implementation phase, my office will provide regular status updates to UC Regents and leadership. We appreciate the Academic Senate's partnership in these efforts to transform culture, practice, and policies to better serve students with disabilities at UC.

Sincerely,

Yvette Gullatt

Vice President for Graduate and Undergraduate Affairs

Vice Provost for Equity, Diversity and Inclusion

**Enclosure** 

cc: Vice Chair Cheung

Chief Policy Advisor Peterson

**Executive Director Lin** 

Assistant Director Labriola



UNIVERSITY OF CALIFORNIA

# Transforming Culture and Practice: serving students with disabilities at the University of California

A final report by The University of California Systemwide Advisory Workgroup on Students with Disabilities **January 2024** 



# **Table of Contents**

EXECUTIVE SUMMARY	4
INTRODUCTION	7
Purpose of this Report	7
Systemwide Workgroup on Students with Disabilities	7
Workgroup Methods	7
Toward A New Framework for Disabilities Inclusion	7
BACKGROUND	9
U.S. and California Current State	9
Legal Environment	10
Existing Resources for Students and Faculty	12
FINDINGS	14
Data Caveats, Sources and Methods	14
Cohort-Based Outcomes (2014-2021)	14
Climate and Belonging	17
RECOMMENDATIONS	19
Student Success	19
Inclusion and Belonging	20
Physical and Technology Infrastructure	21
Accountability	22
CONCLUSION	24
ACKNOWLEDGMENTS	25
APPENDICES	26
ENDNOTES	40

# **EXECUTIVE SUMMARY**

The number of individuals in the United States with a reported disability is increasing rapidly at all levels of education. This increase in reported disabilities reflect laws and protections that were put in place decades ago by disability advocates and activists, as well as the government, for people with disabilities and is a positive sign of greater inclusion. The University of California seeks to ensure that students with disabilities can access the accommodations and supportive elements they need for their success as college students.

In 2021, then-Provost and Executive Vice President Michael T. Brown appointed students, faculty, administrators, and staff to serve on UC's new Systemwide Advisory Workgroup on Students with Disabilities (hereinafter referred to as the Workgroup), charged over a two-year period with the formulation and assessment of recommendations for policies, programs, services, and campus culture to better support students with disabilities.

The Workgroup found that in general, UC's approach to supporting students with disabilities is typically addressed on an individual basis. It is not a comprehensive proactive approach centered on inclusion. This is often referred to as the medical model of disability, where the aim is to solve the problem of the individual that causes difference. In contrast, a social model of disability affirms that a person's disability is only present or exacerbated based on the limitations of the environment. The social model is proactive and aims to transform the environment and culture to be more welcoming to the diversity of people who interact with the community. By creating a new, inclusive framework, one that adapts social and physical structures to serve people with disabilities, the University can achieve accessibility and inclusion in all spheres of campus life.

The Workgroup's report is a first-ever, comprehensive record of the experiences and outcomes of students with disabilities at UC; this is a starting point. Assessing the impact of the University's actions on the well-being and academic performance of students with disabilities is in a very germinal stage. In other words, the University is only beginning to fully understand the complex and intersecting factors that contribute to inequitable access.

The report's authors give recommendations to guide the University in leading a new vision of disability inclusion in higher education, research, and patient care, and in providing a welcoming and positive environment for people with

disabilities. Achieving this vision will require that disability issues become a more integral component of the University's culture of equity and inclusion. By creating an environment where every individual in the UC community feels respected, included, and safe, the University will contribute another strong element to the highly diverse and adaptive workforce of California.

#### WORKGROUP RECOMMENDATIONS

The recommendations in this report are aimed at improving the experience of college for students with disabilities by creating campuses that meet their needs. This calls for UC leadership to reimagine policy, academic culture, campus climate, and physical and technological infrastructure. They are organized for three audiences: Regents, University leaders chancellors, provosts, vice provosts for undergraduate education and graduate divisions, and vice chancellors for administration, student affairs, and equity and inclusion and faculty members.

The Workgroup intends for this report to be used as a guide for the UC system and its campuses to improve disability inclusion for students, providing them with the necessary resources to persist to degree completion and achieve continued success in the workforce and in their communities.

### **Recommendation for Regents:**

Revise Regents' Policy 4400 (Policy on University of California Diversity Statement) to more emphatically position disability access as a diversity issue. Regents' Policy 4400 was last amended in September 2010. In the decade since, the number of students with disabilities at the University has increased substantially. The policy merits a review by the Board of Regents to determine how it can better reflect the evolution of how diversity is described at the University, acknowledging the intersectionality of identities in pursuit of greater equity and inclusion.

### **Recommendations for University leaders:**

Undertake a review of PACAOS 140.00: Guidelines Applying to Nondiscrimination Because of Disability.

Regents' Policy 4400, PACAOS policy 140.00 is overdue for review given the changing student population at UC. The Workgroup recommends that those undertaking this review should ensure that it is inclusive of the consulation of diverse disability specialists.

Strengthen guidance and support for civil rights at UC campuses. The new systemwide Office of Civil Rights, to launch in 2024, is a significant step in fortifying UC's response to discrimination of any kind, including discrimination against individuals with disabilities. The Workgroup recommends that UC students with disabilities be included on search committees for selecting leadership of a disability's rights unit and on advisory groups that are convened by the new unit and that such groups and individuals be given oversight and authority to work with campuses, with the goal of making UC a model community for persons with disabilities, not just for the investigation of compliance issues and complaints.

Expand the functions of ADA coordinators and consider appointing UC chief accessibility officers to oversee the holistic approach of disability services. Only five of UC's ten campuses have a full-time ADA coordinator who is responsible for compliance with existing laws. They also manage other areas of equally complex and important legal responsibilities that protect the University and its communities.

Moving toward dedicated full-time staff for compliance responsibilities, including proactive measures to increase inclusiveness, will help to abate risks. This will move the University away from treating The Americans with Disabilities Act (ADA) parameters as the limit of institutional response. Chief accessibility officers can take on more than merely a compliance or accommodations function to help oversee a holistic approach to disability at UC.

Confirm that all university media segments can meet accessibility standards. Ensure that institutional communication to people with disabilities is as clear and effective as communication with their non-disabled peers. This includes providing appropriate auxiliary aids and services. The Workgroup advises that the University invest in resources—websites, online courses, audio, and video content—that are accessible to individuals with disabilities and are aligned with current policies and laws. Doing so will help ensure that this population is positioned for success, with access to the same opportunities as the broader campus population.

# Develop student services strategic plans that include processes to achieve the following:

- Sustaining a maximum ratio of 250 undergraduate students with a disability to one disability specialist on each campus, and lower ratios for graduate and professional students, to meet the growing demand for student services and accommodations.
- Reducing wait times for initial accommodation meetings with disability services offices to no more than 72 business hours.
- Identifying bottlenecks and barriers in the existing processes for requesting and receiving accommodations.

The Student Services framework for UC has not been reviewed since 2007. Given the increase in students with disabilities—and changing student demographic generally—the Workgroup urges both systemwide and campus-level reviews of student services through an inclusion-forward lens.

Create inclusive spaces on each campus wherein students with disabilities can gather and share a sense of identity, culture, and belonging. Students with disabilities might inhabit a multitude of identities, some of which are supported by existing inclusive campus spaces. Investment in disability cultural resource centers staffed with disabled mentors/ advisors will provide specific support for those within the disability rights movement, such as disabled people of color, who have been historically erased and/or had their needs and contributions excluded.

Update each campus ADA transition plan and remediation schedule. Each campus transition plan and remediation schedule should be reviewed to identify physical obstacles limiting access to programs, services, and activities for persons with disabilities. Additionally, plans should be reviewed and updated to ensure that transportation fleet services include fully accessible vehicles. Staff members updating the plans should create and maintain accessible mapping and signage so persons with disabilities can successfully navigate the physical terrain and environment Because the physical environment is dynamic, creating an annual fund on each campus for minor capital improvements can address the ongoing remediation needs for facilities that are most likely to pose harm/be inaccessible to students, for example an automatic door opener that is inoperable or railing for a ramp. Campuses must also ensure compliance with new construction and planned alterations of existing buildings/infrastructure. (28 CFR § 35.151 - New construction and alterations.)

**Establish/reinforce chancellor-appointed advisory committees.** Existing advisory committees on students with disabilities provide important feedback to University leadership on the student experience. The Workgroup recommends establishing committees that review the total student experience inside and outside of the classroom—where they do not currently exist—and/or strengthening existing committees to provide feedback and perspective on local implementation of the Workgroup's recommendations.

Create a disability-inclusive emergency evacuation plan with procedures for each campus, and train key staff members on how to safely evacuate people with disabilities. Students with disabilities experience an inconsistent campus infrastructure for emergency evacuation. The Workgroup recommends that all facilities adhere to a standard of swift evacuation inclusive of people with varying disabilities and that all facilities personnel are trained on safe evacuation of persons with disabilities.

Institutionalize data collection for students with disabilities, to create a systemwide dashboard on undergraduate graduation rates per the Multi-year Funding Compact with the State. The University has made progress toward more public information on students with disabilities and will complete its obligations as defined by the State. The Workgroup recommends that persons with disabilities be included in decisions about what data are made available on dashboards and, later, included in University reports. The University should also explore data collection on graduate and professional students with disabilities, to get a more complete depiction of all students.

Develop and sustain a professional learning environment for faculty and staff to learn and apply best practices to interact with persons with disabilities. All individuals with disabilities deserve to interact with supervisors, faculty, and leaders who understand their own compliance and confidentiality obligations and how the ADA applies to students, employees, patients, and job applicants in the workplace. Requiring all supervisory personnel to receive ADA training and ongoing professional development around diversity, equity, and inclusion will not only create the type of inclusive culture for which the University strives, but will also mitigate risks.

**Investigate using common systems and data collection practices.** Transitioning into a common disability management system across the UC system can ensure that all data and reports in the system are uniform.

### **Recommendations for Faculty:**

Make inclusive courses accessible during the design or redesign phase rather than midcourse, or later. Campus teaching and learning centers provide crucial pedagogical resources for faculty to redesign courses, yet often this important tool for disability inclusion is underused by faculty. The Workgroup recommends that campuses invest in such centers, where faculty can advance their ability to serve all students by designing inclusive courses with the support of experts in teaching and learning.

Designate and support formal faculty liaison(s) to improve communication between faculty, disabled student services, and teaching and learning centers. These faculty liaisons, much like equity advisors, can foster greater awareness of students' needs and can connect faculty to teaching and learning resources for students. Here, progress can be measured by students' success in course completion, retention, and graduation.

Undertake review of Academic Senate regulations for incomplete grades and academic standing/ progress policies more broadly to ensure that their local application does not have an unintended disparate impact on undergraduate, graduate, and professional students with disabilities.

Grading policies and procedures are matters handled by campus Divisional Senates under Senate Regulation 778. This report's findings can be used by Divisional Senates for possible policy revision on each campus and for consideration as uniform regulation applying to all campuses.

These recommendations, implemented in a comprehensive manner and with an appropriate level of accountability, will contribute to the University's advancement as a leader in higher education, research, and patient care, all the while providing a nurturing, positive, and welcoming environment wherein the provisions of the Americans with Disabilities Act serve as the floor of the University's support.

# Q A

### INTRODUCTION

### **PURPOSE OF THIS REPORT**

The purpose of this report is to raise awareness among University leaders and faculty of the impact of services for students with disabilities on key student outcomes.

The report provides findings-based recommendations to guide leadership in moving toward an increasingly inclusive framework for supporting students with disabilities and to steer the University's long-range strategic vision for how best to improve outcomes for students with disabilities while advancing the University as a model for disability inclusion, both in and out of the classroom. Recommendations by responsible party and current status are available in Appendix A: Current Status of Recommendations.

# THE SYSTEMWIDE WORKGROUP ON STUDENTS WITH DISABILITIES

In December 2021, then-Provost and Executive Vice President Michael T. Brown convened the Systemwide Workgroup on Students with Disabilities (hereinafter referred to as the Workgroup) whose charge was to study experiences and outcomes of students with disabilities at the University of California and to make recommendations for improvement. The Workgroup's efforts included reviewing existing efforts, analyzing student outcomes, and making recommendations in the form of a final report for policy, programming, and other changes that would better support success for students with disabilities. Information about the Workgroup charter and membership is included in Appendix B: Workgroup Detail.

### **WORKGROUP METHODS**

The Workgroup consulted with a diverse set of stakeholders, including undergraduate and graduate students, disability services leaders and specialists, teaching and learning specialists, faculty, and administrators, among others. The Workgroup visited disability services offices and reviewed relevant reports. The Workgroup also commissioned analyses of academic and social outcomes for students with permanent disabilities, disaggregated by disability type, entry status (first-time freshman/transfer students) and by race within the cohort of students with disabilities and those without disabilities. The Workgroup also considered advocacy by multiple groups, helping raise awareness of the challenges faced by students with disabilities. For example, the UC

Student Association (UCSA), through their ACQUIRE campaign, advocated successfully for financial resources at both the State and University levels. A list of stakeholder groups interviewed by the Workgroup is included in Appendix B.

# TOWARD A NEW FRAMEWORK FOR DISABILITIES INCLUSION

Disability is broadly defined as "an interaction between a person's physical impairments, the activities they need to perform, and the barriers presented by the setting in which this occurs. Disability could be health conditions that can strike at birth, youth or middleage or old age. Activities are any of the tasks involved in everyday life. Barriers or obstacles include the build of natural environment as well as the social setting -lack of social support, negative attitudes, in accessible services and facilities."

UC largely applies a medical model in its current support for students with disabilities, a model that is widely adopted by mainstream culture. In the medical model, a person's disability is viewed as a problem to be managed by the individual with disabilities, with the goal of fitting into the mainstream environment; in other words, the individual must adapt to the environment. In its application at UC, the medical model assumes that individuals with disabilities will be proactive in seeking accommodations, even though those accommodation standards may vary at the department or faculty level. The mainstream environment may discourage students from making a disability visible, and the built environment may impede the ability of an individual with disabilities to navigate a campus with ease. Stigma associated with a disability may often prevent or impede an individual from seeking support or accommodation.

- **Q.** What resources do you use to help you navigate campus; what has helped?
- A. On this campus, I have extra time on tests. Having letters from the DSP office that professors already know how to handle a student with a physical and educational disability has made my job of asking for help or asking for services that I need incredibly easier. And it doesn't feel so scary.

STUDENT: Grace Lockwood GRADE/LEVEL: Undergraduate/graduating senior CAMPUS: UC Santa Barbara DISCIPLINE/MAJOR: Psychology

Q A

A social model, on the other hand, recognizes and affirms that one's disability is affected by the structural and cultural environment of the institution. Moving away from a medical model and toward a social model better aligns UC support for students with disabilities with its own stated values; Regents' Policy 4400 explicitly affirms the important role of the University to "remove barriers to the recruitment, retention, and advancement of talented students, faculty, and staff from historically excluded populations who are currently underrepresented," including those who identify as disabled.

In a social model framework, the University can address the environment—physical, structural, and attitudinal—so that individuals can thrive to the best of their ability, thereby maximizing their potential. The responsibility for adaptation and accommodation shifts from the individual to the institution. The social model framework not only has a positive impact on the experiences of UC's disabled student community but also on the experiences of those who teach them, study with them, support them, and work alongside them. Accountability and ownership for this proactive fundamental shift necessarily begin with leaders who set the tone for culture, provide the strategic roadmap and necessary incentives, and measure the institution's overall progress.

- **Q.** What resources do you use to help you navigate campus; what has helped?
- **A.** From the DSP, I have utilized note-takers and some electronic assistive technology like Smart Pens.

As a grad student, having good professors who know about diversity and inclusion and that have asked me how they can help me to succeed, and what I need to succeed. This has changed my attitude and made me feel more positive. Staff with an understanding of and wanting to have conversations about my disability.

STUDENT: Linsey Wehner GRADE/LEVEL: Graduate student CAMPUS: UC San Diego DISCIPLINE/MAJOR: Public Health

### **BACKGROUND**

### **U.S. AND CALIFORNIA**

The U.S. Census American Community Survey<sup>2</sup> indicates that 13 percent of the civilian population reported having some form of disability. Among the 38 million people who are 25 or older and report having a disability, 6.7 million (18 percent) held a bachelor's degree or higher in 2019, up from 13 percent in 2010. This is lower than the 36 percent of the population who do not report a disability.<sup>3</sup> In California, the percentage of working-age people with disabilities with a bachelor's degree or higher was 19 percent, surpassing the national average.<sup>4</sup>

The Chronicle of Higher Education (2023) reports that one in four adults in the United States has a disability and that one in five undergraduates and more than one in ten postbaccalaureate students nationwide report having a disability. University data indicate that an estimated 9 percent of UC's undergraduate and graduate students have received disability services. <sup>5,6</sup> The recent global pandemic has also had a major impact on how students learn and navigate their academic communities, further illuminating the unique needs of disabled students.

Reasons for this increase vary. Some of this growth is the result of students who are currently enrolled or preparing to enter higher education having lived most of their lives under the 1990 Americans with Disabilities Act (ADA) and the subsequent ADA Amendments Act of 2008. Under the ADA Amendments Act, "dyslexia and other specific learning disabilities, [including] attention deficit hyperactivity disorder" are a "physical or mental impairment" under the ADA. Improvements in diagnosis, combined with a destigmatization of disability and a growing culture of seeking health support, also contribute to the increase.

### **UC STUDENT POPULATION**

During the most recent school year (2022-23), approximately 26,000 UC students with disabilities received accommodations from campus Disability Support Service (DSS) offices. This suggests that an estimated 9 percent of the student body across the UC system received support services from a DSS office. In the past three academic years, the percentage of total campus enrollment supported by a DSS office has increased. It is important to note that this does not represent the total count of students with disabilities, as research suggests that only a third of students with a disability report it to their college (NCES, 2022); stigma and other societal factors also contribute to general underreporting.

As shown in Table 1, UC undergraduate enrollment headcount for students with disabilities increased by 190 percent between 2014 and 2021 among its incoming cohorts, as reported by campus DSS offices. Transfer cohorts increased an additional threefold during the same period. At the same time, the percentage of the population served by DSS offices remains modest and has not increased proportionally—rather, in some cases, it has decreased.

On average, among the 2014 to 2021 cohorts, one in five undergraduates (21.0 percent) with a disability in the UC system indicate experiencing solely a temporary disability. Temporary disability refers to inconsistent disability over time as a temporary state, such as a recent disability or occasional disability experience (e.g., fractured limb treatment), rather than a consistent disability as a trait. According to research, improperly identifying students with permanent or temporary disability affects population and outcome estimates. Outcome measures exclude students with temporary disabilities throughout this report, and the Workgroup encourages a separate future study about the impact on those students.

Table 1. UC undergraduate enrollment by disability/no disability, cohorts 2014-2021

			COHORT							
UC Systemwide	Category	2014	2015	2016	2017	2018	2019	2020	2021	% Disabled (2014 to 2021)
Fundance	Has disability	1593	2758	3253	3161	3623	4086	3755	4068	155.4%
Freshman	No disability	40276	39070	44338	43067	43115	41864	42953	47658	18.3%
T	Has disability	617	1094	1482	1506	1670	1728	1918	2341	279.4%
Transfer	No disability	15450	15022	17021	17519	18797	17899	18520	17801	15.2%
Overall	Has disability	2210	3852	4735	4667	5293	5814	5673	6409	190.0%
Overall	No disability	55726	54092	61359	60586	61912	59763	61473	65459	17.5%
	Total	57936	57944	66094	65253	67205	65577	67146	71868	24.0%

### **LEGAL ENVIRONMENT**

The University of California is obligated by federal and State laws to make the full array of its educational offerings accessible to all students, including students with disabilities; full access is a legally protected civil right of all UC students. This includes access to campus facilities, classrooms, instruction—and its attendant visual and auditory resources—dormitories, and libraries.

Federal disability laws continue to evolve, with a notable recent increase in regulatory activity by the Department of Justice (DOJ) regarding access to digital assets and mobile applications. As more students with disabilities access postsecondary education, case law may push higher education institutions to be even more inclusive and accessible to students with disabilities than is currently mandated.

In recent years, disability discrimination complaints have been the most common type received by the United States Department of Education Office for Civil Rights.<sup>9</sup>

Congress passed the Americans with Disabilities Act or ADA in 1990 "to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." By enacting the ADA, legislators sought to remedy several Congressional findings of pervasive disability discrimination in the United States. Key provisions of the ADA can be found in Appendix C: Americans with Disabilities Act. The intent for the ADA was to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities." Invoking "the sweep of congressional authority," Congress sought to ensure both equal treatment and equal opportunity for individuals with disabilities by imposing a broad prohibition on disability discrimination.

Under Title II of the ADA, public entities like UC are required to make reasonable accommodations, such as providing

auxiliary aids and services to qualified individuals with disabilities. Examples of auxiliary aids and services include, but are not limited to, qualified American Sign Language interpreters for deaf students and large-print materials for students who have low vision. Furthermore, the ADA requires the modification of policies, practices, and procedures to avoid discrimination against individuals with disabilities unless a public entity can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity in question. In some instances, the ADA requires public entities to take affirmative steps to remove physical accessibility barriers in the built environment; it also requires new construction and alterations to proactively meet detailed accessibility standards to ensure that individuals with mobility disabilities can travel throughout the University's public spaces and buildings without barriers.

# EXISTING RESOURCES FOR STUDENTS WITH DISABILITIES

Across the University, Disability Student Services (DSS) offices play a key role in supporting students with disabilities. The Association on Higher Education and Disability (AHEAD) posits that the overarching goal of disability student services is the mitigation of barriers to access for disabled individuals in all institutional programs, services, and activities. The scope and breadth of DSS offices' provision of disability service work includes:

- 1. Leadership and collaboration in framing a commitment to disability access and equity as an integral aspect of their institution's culture.
- 2. Advising and educating the campus community about disability and inclusive practices.
- 3. Providing services, strategies, and accommodations to mitigate the barriers faced by individual people with disabilities.

- 4. Administering office operations that are guided by a mission and that have access to appropriate resources.
- 5. Offering professional development opportunities.

Disability services professionals working at colleges and universities have varied educational and career backgrounds, including counseling, social work, student affairs, education, psychology, rehabilitation, and disability studies. Most directors and coordinators of disability resources and service offices have master's degrees, and many have doctoral degrees across these academic disciplines (Konitz, 2011).

In October 2023, the Workgroup asked DSS offices to provide information on their staffing levels, funding, and population of students with disabilities served. One must note that supporting students with disabilities is a campuswide concern and that DSS offices are not the only areas on campus responsible for creating a culture of inclusion. However, for purposes of this analysis, data collection relied on resources limited to the DSS offices. Further inquiry is needed to understand the level of investment and resources across the system in areas such as campus design and planning, faculty capacity, and technology accessibility, among others.

### **Staffing**

As of October 2023, there are approximately 164 FTE staff members (sixty-eight staff members deliver academic accommodations, sixty are disability specialists, and thirty-six are other personnel) who support students with disabilities in DSS offices across UC's ten campuses.

Disability specialists—defined as student services professionals who are trained to assess accommodation needs—play an integral role in supporting students with disabilities. Providing accommodations for students is a

time-intensive process involving an interactive discussion with the student and, when necessary, a review of the disability documentation provided. DSS staff work with faculty and students to identify reasonable accommodations for the student. In addition to disability specialists, other staff members provide a range of support, which may include direct service delivery of academic accommodations, administrative support, leadership, and supervision.

### **Caseloads**

The ten UC campuses reported having sixty disability specialists supporting a total of 26,245 undergraduate, graduate, and professional students, averaging a 1:437 ratio (see Table 2). In this staffing model, a shortage of disability specialists can lead to delays in the provision of necessary services for students with disabilities. AHEAD, a professional resource for many in the disability services profession in higher education, recommends a ratio of one disability services specialist per an undergraduate student caseload of 250. For graduate and professional students, the recommended ratio is 1:125 and for a medical/health sciences program, it is 1:80.

Ratios serve as a guide for best practices and establish a baseline for assessment across the profession. While the methodology used to establish a ratio can be debated, the purpose of these guides is to ensure quality and timely service to students while also avoiding burnout, fatigue, and human error by specialists who interface with numerous students and faculty daily. Disability specialists interviewed for this report indicated that retention of specialists, as well as recruiting for specialist vacancies, was becoming more difficult with the growing caseload.

Table 2. Case ratios and student population UC-wide

Total Enrollment 2022–23	FY 23 Number of Undergrad Students Served	FY 23 Number of Grad and Professional Students Served	Percent of Population Served by DSS Units	# of Disability Specialists	Average Case Ratios
45,307	4466	896	12%	15	1:357
39,679	2848	663	9%	8	1:438
35,937	2108	243	7%	6.5	1:361
46,430	3834	556	10%	8	1:548
9,103	302	25	4%	1	1:327
26,809	1595	278	7%	4	1:468
42,006	1576	251	4%	7	1:261
3,140	n/a	489	15%	2	1:244
26,420	2953	243	12%	5	1:639
19,478	2766	153	15%	3.5	1:834
	Enrollment 2022–23 45,307 39,679 35,937 46,430 9,103 26,809 42,006 3,140 26,420	Enrollment 2022–23         of Undergrad Students Served           45,307         4466           39,679         2848           35,937         2108           46,430         3834           9,103         302           26,809         1595           42,006         1576           3,140         n/a           26,420         2953	Total Enrollment 2022–23         FY 23 Number of Undergrad Students Served         of Grad and Professional Students Served           45,307         4466         896           39,679         2848         663           35,937         2108         243           46,430         3834         556           9,103         302         25           26,809         1595         278           42,006         1576         251           3,140         n/a         489           26,420         2953         243	Total Enrollment 2022-23         FY 23 Number of Undergrad Students Served         of Grad and Professional Students Served         Population Served by DSS Units           45,307         4466         896         12%           39,679         2848         663         9%           35,937         2108         243         7%           46,430         3834         556         10%           9,103         302         25         4%           26,809         1595         278         7%           42,006         1576         251         4%           3,140         n/a         489         15%           26,420         2953         243         12%	Total Enrollment 2022-23         FY 23 Number of Undergrad Students Served         of Grad and Professional Students Served         Population Served by DSS Units         # of Disability Specialists           45,307         4466         896         12%         15           39,679         2848         663         9%         8           35,937         2108         243         7%         6.5           46,430         3834         556         10%         8           9,103         302         25         4%         1           26,809         1595         278         7%         4           42,006         1576         251         4%         7           3,140         n/a         489         15%         2           26,420         2953         243         12%         5

Table 3. Total DSS actual expenses and net change UC-wide

UC Campus	FY 21	FY 22	FY 23	Percent change from FY 21 to FY 23
Berkeley	6,648,356.61	5,758,044.33	6,713,817.06	1%
Davis	3,047,262	3,363,078	3,912,205	28%
Irvine	1,459,892	1,871,849	2,214,006	52%
Los Angeles	2,091,526	2,960,102	3,509,903	68%
Merced	329,410	269,054	289,874	-12%
Riverside	1,181,469	1,035,988	1,389,123	18%
San Diego	1,490,771	1,948,776	1,536,649	3%
San Francisco	374,968	395,929	370,426	-1%
Santa Barbara	1,491,534.73	1,808,883.53	2,382,785.52	60%
Santa Cruz	1,990,948.08	2,954,559.19	3,009,993.80	51%
Total	\$20,106,137	\$22,366,263	\$25,328,782	26%

### **Expenses for DSS offices**

Total system expenses of DSS offices in the past three fiscal years have increased by 26 percent (see Table 3); however, some campuses have experienced low increases and others a decrease.

In fiscal year 2023, most DSS offices across the UC system experienced an increase in expenses, likely because of full post pandemic return to campus and an increase in students registering with DSS offices. Expenses include personnel salary and benefits, student staffing, and the provision of accommodations and operations.

### **Accommodations**

Institutions of higher education provide access for persons with disabilities through furnishing (1) reasonable accommodations, (2) modifications to policies, practices, or procedures, and (3) proactive efforts to provide accessible infrastructure. For the 2023 fiscal year, the ten campuses reported spending approximately \$4.9 million to provide reasonable accommodations for students in the classroom. Reasonable accommodations include auxiliary aids and services, such as an American Sign Language interpreter for deaf students.

Campuses also provide reasonable modifications to academic courses for students. Common examples include extended time for exams, private exam settings, or priority course registration. Lastly, campuses engage in proactive physical access improvements to ensure that the built environment is accessible to individuals with disabilities.

### **EXISTING RESOURCES FOR FACULTY**

Multiple UC offices and individuals have developed tools, guidelines, and resources not only to facilitate compliance with ADA guidelines but also to help educate UC contributors and collaborators, particularly faculty. Examples include UC-wide Ethics and Compliance guidelines and the learning and course design resources from campus centers for teaching and learning.

The UC Office of Ethics, Compliance and Audit (ECAS) has developed guidelines for campuses to ensure appropriate processes for resolving issues around fundamental alteration and undue burden (see Appendix D: Office of Ethics and Compliance Guidance Detail). ADA coordinators are responsible for ensuring that campuses follow these guidelines and that designated authorities are charged with making a determination as to whether a proposed academic accommodation would fundamentally alter a course/program after considering all resources available for use therein.

Key groups that have received these guidelines include UC Legal, ADA coordinators, directors of disabled students' offices (DSOs), campus ethics and compliance officers, and the Academic Senate.



UC Centers for Teaching and Learning have also developed resource compendia containing accessible teaching programs and resources that aid faculty in their teaching and in the development of accessible curricula.

Examples of resources for faculty include:

- On-demand resources: web-based resource and how-to guides, including self-paced courses for learning how to create accessible materials and environments and for implementing accommodations.
- Instructor learning communities focused on topics related to equity-minded and inclusive teaching, including accessibility practices.
- Teaching workshops that feature universal design for learning and accessibility, often as part of a larger equity or social justice framework.

- **Q.** What resources do you use to help you navigate campus; what has helped?
- A. Through the Disabled Student's Program, I have received extended time on exams, automated priority registration, smart pens, Sonocent audio note-takers, and Glean audio note-takers that will create these like transcripts.

STUDENT: Monica Mekhlof GRADE/LEVEL: Undergraduate/junior CAMPUS: UC Santa Barbara DISCIPLINE/MAJOR: Communications and Sociology

# **FINDINGS**

To understand the experience of students with disabilities in the UC system, the Workgroup commissioned the UC Davis Student Affairs Assessment Team to conduct an extensive analysis of student data and related outcomes. The Workgroup also derived its findings from its review of research and other studies, as well as discussions with engaged students, staff, and faculty on whom these issues have an impact.

To analyze and compare the outcomes of students with disabilities over time, the UC Davis Student Affairs
Assessment Team used a new cohort-based method to assess trends in population for the period 2014–2021. The analysis uses national benchmarks for student success outcomes such as retention, graduation, time-to-degree, and demographics. While past analyses have included headcounts and surveys of students with disabilities, this analysis focused on student academic and social outcomes by homing in on students with permanent disabilities and disaggregating by disability type, race, and entry status (first-time freshman/transfer students) within the respective cohorts of students with disabilities, compared with those without disabilities.

### DATA CAVEATS, SOURCES, AND METHODS

Any analysis of outcomes for students with disabilities must consider how stigma associated with a disability can prevent or impede those with disabilities from seeking out assistance. It is likely that these analyses, while directionally accurate, underreport the population.

The analyses relied on a variety of data sources and methodologies. The UC Undergraduate Experience Survey (UCUES), the UC Graduate Student Experience Survey (UCGSES), and population averages described below rely heavily on students' self-identification of their disability and are based on respondents completing surveys, which can limit the sample.

Figure 1. Data sources for Workgroup analysis

<b>UCUES</b> (UC Undergraduate Experience Survey)	• Every other year on even years. • Self-reported data.
<b>UCGSES</b> (UC Graduate	<ul> <li>Administered for the first time in</li></ul>
Student Experience Survey)	Spring 2021. <li>Self-reported data</li>
Student Disability	<ul> <li>Quarter/semester, annual based on</li></ul>
Centers	department local databases. <li>Approved accommodations.</li>
Ad-hoc Reports and	Reporting specifications vary based on
Data Requests	parameters defined by requestor.
Population Averages	<ul> <li>Apply national trends to a campus population.</li> <li>Varies based on the study.</li> </ul>

### **COHORT-BASED OUTCOMES (2014-2021)**

Each cohort in this analysis represents the entering class of students, which is compared with prior years and among students with disabilities (permanent and temporary) and entry status (first-time freshman/transfer). Additional data tables for UCUES findings are available in Appendix E: Additional UCUES Data on Climate and Student Experience.

The population of students with disabilities has increased by almost 200 percent during the period analyzed for this report, at a higher rate of growth than the population of students without disabilities. The analysis found that graduation rates, as well as time-to-degree for students with permanent disabilities, are lower than those of their peers without disabilities (see Figure 2).

While academic outcomes are challenging to measure accurately, given the difference in the types and degrees of disability, analysis shows that students from marginalized ethnic groups with disabilities tend to have a higher graduation rate gap than their peers. Other pertinent findings include the following.

- The population is growing: The population of students with disabilities registered with UC Disability Support Service Centers increased by 190 percent between 2014 and 2021, demonstrating a higher rate of growth than the population of their non-disabled peers, which grew at 17.5 percent during the same period. Transfer students with a disability accounted for the highest increase proportionately.
- Retention rates require more review: Freshmen and transfer cohort students with a permanent disability generally demonstrate greater first-year retention rates than students without a disability. However, this outcome should be viewed with caution, as students often register with a disability center at various points in their undergraduate career, so this metric is a snapshot in time. Thus, it could be
- an underreporting of students with disabilities and an overrepresentation of their retention.
- Graduation rates are lower: While retention rates for undergraduates with permanent disability are robust, graduation rates are lower than their cohort peers. The fourand six-year graduation rates for freshmen with a permanent disability are lower than those of their peers by an average of 22.5 percent and 5.6 percentage points, respectively. Between 2014 and 2019, the two- and four-year graduation rates of transfer undergraduates with a permanent disability were lower than their peers by an average of 1.4 percent and 9.3 percentage points, respectively.

Figure 2. 4- and 6-year graduation rates by cohort entry year

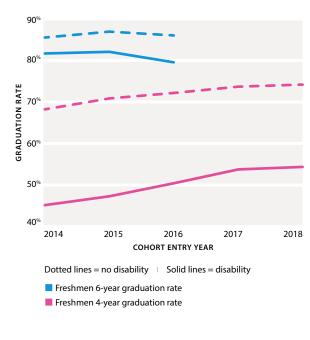
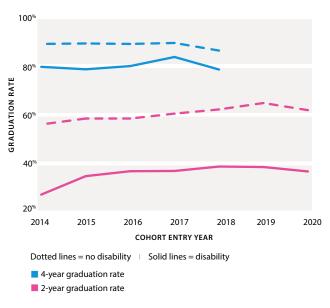


Figure 3. Transfer 2-year and 4-year graduation rate



• *Time-to-degree is longer:* On average, between 2014 and 2017, the time-to-degree for freshman and transfer students with a permanent disability was respectively longer to attain by approximately three months (0.23 years) and five months (0.40 years), respectively, relative to their cohort peers (see Table 4).

Table 4. Freshman and transfer time-to-degree (in years) by permanent disability type, cohort 2014–2020

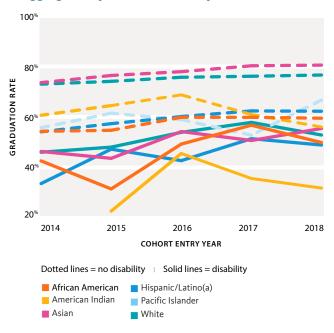
		COHORTS							
	Permanent Disability Type	2014	2015	2016	2017	2018	2019	2020	Disabled 2014 to 2021
	Mobility (DRB)	4.32	4.09	4.14	4.03	3.65	2.96	-	4.05
	Other Functional Impairment (DRC)	4.37	4.29	4.12	4.08	3.84	2.93	-	4.14
	Acquired/Traumatic Brain Injury (DRD)	-	4.37	4.15	4.09	3.83	3.00	-	4.11
Freshman,	Other Hearing Impairment (DRG)	-	4.08	4.01	4.04	3.90	3.00	-	4.01
Time to	Learning Disability (DRI)	4.42	4.51	4.26	4.12	3.87	2.94	-	4.24
Degree	Vision – Low Vision (DRJ)	-	4.19	4.15	3.97	3.71	3.00	-	4.01
	Attention Deficit /Hyperactivity Disorder (DRK)	4.61	4.50	4.35	4.12	3.91	2.96	-	4.30
	Autism (DRL)	4.58	4.63	4.47	4.07	3.91	3.00	-	4.33
	Psychological Disability (DRM)	4.67	4.54	4.31	4.13	3.87	2.91	-	4.30
	Mobility (DRB)	2.38	2.51	2.60	2.37	2.64	2.46	1.94	2.41
	Other Functional Impairment (DRC)	3.17	2.72	2.54	2.40	2.36	2.25	1.96	2.49
	Acquired/Traumatic Brain Injury (DRD)	-	4.13	2.62	2.67	2.52	2.22	1.86	2.67
Transfer,	Other Hearing Impairment (DRG)	-	-	2.14	2.35	2.18	2.40	2.00	2.21
Time to	Learning Disability (DRI)	2.66	2.68	2.46	2.70	2.49	2.29	1.93	2.46
Degree	Vision – Low Vision (DRJ)	-	-	2.50	2.84	-	2.11	1.97	2.36
	Attention Deficit /Hyperactivity Disorder (DRK)	3.24	2.83	2.71	2.64	2.51	2.35	1.97	2.61
	Autism Syndrome (DRL)	-	3.26	2.88	2.53	2.43	2.33	1.96	2.57
	Psychological Disability (DRM)	3.18	3.08	2.68	2.68	2.51	2.38	1.96	2.64

(-) small cell size

- Academic outcomes vary by disability type: Students with
  a permanent disability are not a homogenous group.
  Generally, students with a permanent disability tend
  to have better overall retention rates, when disaggregated
  by disability type. Freshman students who report autism or
  a learning disability such as Attention Deficit/Hyperactivity
  Disorder demonstrate similar or below-average retention
  rates among their cohort peers. Across different measures
  of academic outcomes, variations by disability type indicate
  the necessity of further understanding the unique needs
  of students.
- Academic outcomes vary by race/ethnicity:<sup>15</sup> The four- and six-year graduation rates of freshman students with a permanent disability who were from Asian, African American or Hispanic/Latino backgrounds were on average lower than those of white students with a permanent disability; they averaged a 5 percent four-year graduation gap and a 4 percent six-year graduation gap, respectively. The two- and four-year graduation rates of transfer students with a permanent disability who were from Asian, African

- American, or Hispanic/Latino backgrounds were generally lower than white students with a permanent disability, averaging a two-year graduation gap of 8 percent and a four-year graduation gap of 7 percent, respectively.
- Graduation rates vary by ethnicity and ability status:
  Significant graduation rate gaps exist between students of all race and ethnicity types with a permanent disability when compared with students of the same race and ethnicity types but without a permanent disability. For example, the freshman 4-year graduation rate of students with a permanent disability who identify as Hispanic/Latino experienced a graduation rate gap ranging from 10 percent to 21 percent between 2014–18. This graduation gap also exists for white students with a permanent disability, with graduation rate gaps ranging from 18 percent to 27 percent between 2014–2018. This indicates that permanent disability is a salient factor that affects graduation rates across all races and ethnic groups (see Figure 4).

Figure 4. Freshman 4-year graduation rate disaggregated by race and disability status



### **CLIMATE AND BELONGING**

In general, students with disabilities report feeling a lower sense of belonging and less respect and satisfaction than their peers without disabilities, across all UC campuses (see Figure 4).

### **Undergraduate experiences**

- Sense of belonging: 45 percent and 47 percent of student respondents with one or more disabilities reported on the 2020 and 2022 UCUES, respectively, that they 'agreed' or 'strongly agreed' with the statement "I feel that I belong on this campus." Results for students not reporting a disability were higher by 10–11 percent for the same period.
- Respected: In the 2020 UCUES, 52 percent of student respondents with one or more disabilities agreed or strongly agreed with the statement, "Students with a disability or condition like mine are respected on this campus." However, in the 2022 UCUES, this number decreased, with 46 percent of student respondents with one or more disabilities sharing the same sentiment.

- Satisfaction—Academics: In the 2020 UCUES, 41 percent of student respondents with one or more disabilities said they were satisfied or very satisfied with their overall academic experience. In 2022, 57 percent of students with one or more disabilities indicated they were satisfied or very satisfied with their overall academic performance.
- Satisfaction—Social: 38 percent and 40 percent of student respondents with one or more disabilities reported on the 2020 and 2022 UCUES, respectively, that they were satisfied or very satisfied with their overall social experience.

### **Graduate and professional student experiences**

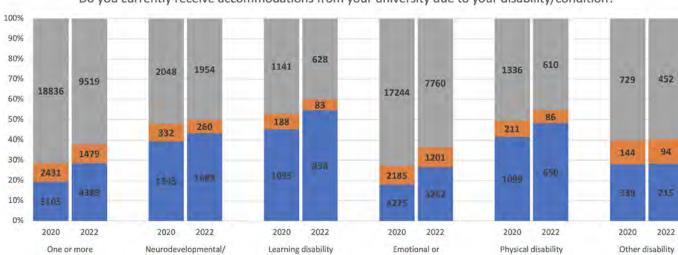
- Included by faculty: 78 percent of graduate/professional student respondents with any disability or condition at least somewhat agree that they feel included by faculty within their program, compared with 91 percent of their peers with no reported disability or condition.
- Space and resources: 74 percent of graduate/professional student respondents with any disability or condition felt that they have the space and resources needed to succeed academically, compared with 90 percent of their peers with no disability or condition.
- Degree programs: 86 percent of graduate/professional student respondents with any disability or condition at least somewhat agreed with the statement, "I'm on track to complete my degree program on time," compared with 94 percent of their peers with no disability or condition.
- Financial security: 39 percent of graduate/professional student respondents with any disability or condition at least somewhat agreed with the statement, "I feel financially secure," compared with 60 percent of their peers with no disability or condition.

Figure 5. Undergraduate experience (UCUES)

cognitive disability

or condition

disability(ies)



mental health

concern or condition

or condition

or condition

or condition

Do you currently receive accommodations from your university due to your disability/condition?

# RECOMMENDATIONS

# The recommendations below are made with the goal of closing institutional equity gaps for those with disabilities at the University.

Students with disabilities experience poorer outcomes with respect to academic success, as well as a lesser sense of belonging and inclusion. The Workgroup's findings also show that the proportion of students with disabilities at UC is increasing dramatically and may continue to increase due to the growing population in P–12 schools and community colleges. Taken together with the findings outlined in this report, this projected population growth indicates a need for additional targeted resources, either new or reallocated. While it was not the charge of the Workgroup to identify how much or where such resources should come from, it is evident that they will play a vital role in realizing the following recommendations.

The recommendations below are organized in two ways: first, within the key action areas of student success, inclusion, and belonging; physical and technology infrastructure; and accountability and second, by responsible entity whose leadership and actions are necessary for implementation.

### **STUDENT SUCCESS**

The Workgroup recommends improving student success through six targeted recommendations for university leaders and faculty. Success is measured by increases in four- and six-year graduation rates as well as by improvements in satisfaction scores for students with disabilities.

### **For University leaders**

# Strengthen systemwide guidance and support for civil rights at UC.

The new Systemwide Office of Civil Rights (SOCR) that will launch in 2024 is the first step in an important effort to fortify the University's response to all forms of discrimination, including discrimination against individuals with disabilities.

As the systemwide office takes shape, the Workgroup recommends that UC students with disabilities be included on leadership search committees and newly convened advisory groups for the new office and its disability rights unit. Moreover, the disability rights unit should be responsible for working with campuses on training, professional development, and other methods for making the University

community a model for supporting and welcoming persons with disabilities, not focused solely on compliance and complaint investigation.

A compliance-only approach ignores the larger aspects of inclusion and belonging. For example: a building with a ramp is technically ADA-compliant, but if the ramp in question is completely out of the way, difficult to see, and challenging to access, a physically disabled student receives the message that they may not be welcome in that building.

Develop and sustain a professional development environment so that faculty and staff have a place to learn and apply best practices for interacting with persons with disabilities.

Whether students, current employees, or job candidates, all individuals with disabilities deserve to interact with leadership who understand their compliance and confidentiality obligations and know how the ADA applies to all concerned individuals: students, employees, and job applicants in the workplace.

The Workgroup considers learning/training opportunities for faculty and staff to be a necessary component of any career, particularly for those with people-management responsibilities. Although a single training will at best raise awareness and not necessarily change behavior, ongoing professional development for faculty and staff was consistently raised as a critical aspect of improving the experience of students with disabilities. Additionally, due to legal considerations, requiring all supervisory personnel to receive professional development in this area will mitigate risks.

Develop strategic plans for student services on each campus that include processes to achieve the following:

1) sustaining a maximum ratio of 250 undergraduate students per 1 disability services specialist and to consider lower ratios for graduate and professional students, to meet the growing demand for accommodations and services, 2) reducing the wait time for initial meetings with disability services offices to a maximum of 72 business hours, and 3) improving the existing processes for requesting help with identifying and addressing bottlenecks and barriers.

While ratios can seem arbitrary, they serve as an important baseline for assessing staffing levels to ensure quality of service to students and to avoid burnout of staff. AHEAD reports in its multi-institution survey that average student-to-disability specialists' ratios on large campuses of 30,000 students or more was usually 159:1. UC student-staff ratios are larger.

Additionally, the Student Services framework for UC has not been reviewed since 2007. Given the increase in students with disabilities as well as the changing student demographic generally, reviewing student services through a wider and inclusion-focused lens will ensure that the needs of students with disabilities are met and will better integrate student services with academic success, retention, and graduation.

Areas of inquiry can include transforming disability services staffing from a model of compliance to one of holistic student success and support. This is accomplished not only by increasing personnel and decreasing wait times, but also by developing a culture within these entities around disability inclusion and justice.

Implement data collection on students with disabilities to develop a systemwide dashboard on undergraduate graduation rates per the Multi-year Funding Compact with the State.

A common language for reporting, coding, and privacy safeguarding will enable the University to truly assess its progress in terms of student success over time and will demonstrate what is truly of value to the institution by what it measures. As these systems are developed, the Workgroup recommends that persons with disabilities as well as subjectmatter experts on privacy be included in decisions about what data are available on dashboards and in university reports.

### **For Faculty**

Make courses accessible during the course design or redesign phase.

Campus teaching and learning centers provide critical resources to faculty for redesigning courses, yet this important tool for disability inclusion is underutilized.

By investing in teaching and learning centers and encouraging the value for all faculty to advance their professional learning in inclusive pedagogy and course design, University leaders directly affect the success of students with disabilities. Existing models to consider replicating or expanding include the <u>Inclusive Teaching Institute</u> (Irvine), Rethinking Instructional Design for Learning Engagement, <u>RIDLE 4X</u> (Riverside), or <u>Universal Design for Learning</u> (Berkeley).

Undertake review of Academic Senate regulations for incomplete grades and academic standing/progress policies more broadly to ensure that their local application does not have an unintended disparate impact on undergraduate, graduate, and professional students with disabilities.

Grading policies and procedures are matters handled by campus Divisional Senates under Senate Regulation 778. This report's findings can be used by Divisional Senates for possible policy revision on each campus and for consideration as uniform regulation applying to all campuses.

Designate and support formal faculty liaison(s) to enhance and strengthen communication between faculty, disabled student services, and teaching and learning centers.

Faculty liaisons, much like equity advisors, can foster greater awareness for faculty of what students need. They can connect faculty to teaching and learning resources on behalf of students, with progress measured by student success in course completion, retention, and graduation.

Faculty liaisons will advance students' success by putting in place disability-related accommodations, providing information about disability-related policies and resources, and effectively advocating for the needs of both faculty and students.

### **INCLUSION AND BELONGING**

The Workgroup recommends improving inclusion and belonging through the following two recommendations for Regents and University leaders. These are aimed at improving the student experience, as findings show that students with disabilities have lower rates of satisfaction and higher rates of feeling excluded and not feeling respected than do their non-disabled peers.

Students with disabilities who share intersectionality with other marginalized characteristics such as race and/ or ethnicity experience poorer outcomes. One measure of success is to see improved ratings on student experience, student satisfaction and belonging, and feelings of respect among students with disabilities as reported on the UCUES and UCGSES.

### **For Regents**

Strengthen Regents' Policy 4400 (Policy on University of California Diversity Statement) to emphasize disability accessibility as a diversity issue.

Regents' Policy 4400 was last amended in September 2010. In the decade since then, the number of students with disabilities at the University has significantly increased and is projected to continue to grow.

The policy merits a review by the Board of Regents to determine if it can more accurately reflect the evolution of diversity at the University, in particular, the intersectionality of identities in pursuit of greater inclusion. Those with disabilities can no longer be an afterthought but are core to the pursuit of inclusion.

### **For University Leaders**

Create dedicated and inclusive spaces on each campus where students with disabilities can gather and develop a shared sense of identity and culture and can foster selfesteem, identity development, and a sense of belonging.

Students with disabilities inhabit a multitude of identities, some of which are supported by inclusive campus spaces that respect and appreciate the complexity of these identities. Investing in disability cultural resource centers staffed with diverse disabled staff, mentors and advisors provides a communal space for those from the disability community to gather—outside of the more narrowly focused disability student services offices. These spaces, both formal and informal, provide additional support for intersecting identities among students and have historically supported the disability rights movement.

The Workgroup commends UC Berkeley for the launching of its Disability Cultural Community Center in 2022 and UC Irvine for establishing a workgroup to study the needs for and feasibility of establishing a disability cultural center. These are illustrative of the power of creating community and serve as strong examples for other campuses and for the system as a whole. Investing in such resources also sends a clear message to the University's community of students with disabilities that they are seen, heard, respected, and welcome at the University of California.

### PHYSICAL AND TECHNOLOGY INFRASTRUCTURE

The Workgroup recommends improving physical and technology infrastructure through three recommendations for Regents and University leaders aimed at ensuring equity and inclusivity for students with disabilities. Without basic elements in place, such as these students' ability to attend class and to have as robust an academic experience as their peers and/or core safety concerns such as being able to evacuate in case of an emergency, the University will be hindered in improving student success and the climate for students with disabilities.

Update each campus's ADA Transition Plan, which identifies physical obstacles limiting access to programs, services, and activities by persons with disabilities; ensure that transportation fleet services include fully accessible vehicles; and create an annual fund for minor capital improvements on each campus to remediate facilities that are most likely to cause harm and/or to be inaccessible to students.

The plans should include a remediation schedule for physical obstacles in campus spaces and a plan to incorporate accessible mapping and signage on each campus for persons with disabilities to navigate the physical terrain and environment. Inclusive design standards such as those developed and detailed by The Kelsey organization<sup>16</sup>, as well as by numerous other commercial and public architects and contractors, are now prevalent. All new campus plans should support universal, disability-forward design and should update older infrastructure with these in mind.

Many UC campuses have older buildings that may not be ADA-compliant, and the Workgroup recognizes that fulfilling this recommendation will require significant funding and prioritization. A starting place aligned with this recommendation is not only to ensure that every new building meets elements of universal design and ADA compliance, but also to set aside funds for improvements to older facilities. Many such older facilities may need to be upgraded to be seismically compliant, for example, to comply with State law; universal design should be incorporated where possible during each required upgrade.

### Create a disability-inclusive emergency evacuation plan and procedures on each campus and train key personnel on how to safely evacuate persons with disabilities.

Students with disabilities experience an inconsistent campus infrastructure for emergency evacuation—and often, downright danger. Every campus must develop an emergency evacuation plan that incorporates in a specific, customized section, how to assist persons with disabilities. Students need to know who to contact about emergency planning and need to be engaged in the planning specific to their needs and the locations where they live/visit most frequently on campuses. The Workgroup recommends that all facilities adhere to the highest standards for swift evacuation and that all facilities personnel are trained on safe evacuation of persons with disabilities.

Ensure that all University websites, online courses, audio, and video content meet required accessibility standards. Ensure that communications with individuals with disabilities are as effective as communications with others, including providing appropriate auxiliary aids and services.

For many, the welcoming environment of a university begins with a simple web search for services and programs. This initial experience, which many take for granted as a reliable form of communication, can quickly demonstrate inaccessibility for people with disabilities. If an individual with a disability is unable to navigate around a website for a UC campus or course, they cannot be expected to attain academic success and are not being treated equitably.

Electronic accessibility extends to courses, programs, and events. Current University policy and federal regulations have already outlined how universities can improve in this area. Campuses should aim for full compliance with the existing Office of the President's IT Accessibility Policy and with the recently distributed Office of Civil Rights Dear Colleague letter of May 19, 2023.

#### **ACCOUNTABILITY**

The Workgroup recommends improving University accountability through four recommendations for University leaders aimed at making progress toward more inclusive campuses. A measure of this work can be achieved through annual reports that summarize programmatic progress and student outcomes.

# Develop consistent, common systems and data collection practices.

Transitioning to a single common disability management system can ensure that all data and reporting elements/ reports are uniform systemwide.

Lessons learned from the data collection process for this report indicate that campuses require standardized data definitions, consistent and specific templates, and intensive technical assistance to be able to produce outcomes and measures. To collect this information in the future, the University will need to be able to gather such data nimbly and comprehensively to assess progress and to identify ongoing areas of challenge, including those identified in this report.

**Undertake policy review of PACAOS 140.00:** Guidelines Applying to Nondiscrimination on the Basis of Disability.<sup>17</sup>

Regents' Policy 4400, PACAOS policy 140.00 is overdue for review, given the changing student population at UC. A clear opportunity to enhance PACAOS is its current underlying premise that the Americans with Disabilities Act (ADA) is merely a floor, or minimally acceptable standard, for compliance. Disabilities inclusion must go beyond that to ensure comprehensive equity, diversity, and inclusion of this population at UC.

# Establish/strengthen chancellor-appointed advisory committees.

Existing advisory committees on students with disabilities provide important feedback to University leadership on student experience—if they are true advisory groups and their feedback is incorporated into decision-making.

The Workgroup recommends establishing these committees where they do not currently exist, and/or strengthening existing committees to provide feedback and perspective on local implementation of the Workgroup's recommendations. It is important that these committees take a comprehensive look at the student experience both within and outside the classroom. Advisory committees can also serve as a hub to address challenges that span multiple divisions and silos across the campuses.

# Q A

# Expand the functions of ADA coordinators and consider appointing UC chief accessibility officers to oversee the holistic approach of disability services.

Beyond disability specialists who assist students and faculty with the accommodation process, there is a critical need for full-time positions that support compliance of existing laws and regulations and that help promote a disability-inclusive culture at UC.

Title II Regulations require the presence of ADA coordinators who assist campuses in fulfilling obligations and rights defined by existing laws and policies. Only five of the ten campuses have a full-time ADA coordinator dedicated to this task, which implies a potential risk given the growing population of those with disabilities. The remaining five campuses have split this responsibility within existing compliance or risk personnel functions—ones which oversee other equally complex and important responsibilities that protect the University and its communities.

Chief accessibility officers can further assist in these efforts and can also support campuses in becoming more inclusive and proactive.

A dedicated disabilities lead on each campus can in turn work in collaboration with the imminent Systemwide Office for Civil Rights and its forthcoming disability rights unit.

- **Q.** What resources do you use to help you navigate campus; what has helped?
- A. Some of the most valuable academic and community support that I have received has come from the Disability Cultural Center at UC Berkeley. This is a place where I can come and go freely whenever I need support while on campus. I hope other institutions in the UC system can create their own DCC to holistically serve students with disabilities on their campus.

STUDENT: Ryan Manriquez GRADE/LEVEL: Graduate student CAMPUS: UC Berkeley DISCIPLINE/MAJOR: Public Policy

# CONCLUSION

# Addressing the needs of students with disabilities at the University of California is integral to attaining institutional goals for student success, equity, and inclusion.

The current state of students with disabilities indicates a gap in the experience of this population compared with others, both with respect to general climate and satisfaction and to quantitative measures of student success. The Workgroup's recommendations outline shifts in policy and specific practice that will move the University's current state beyond compliance and toward comprehensive disability inclusion, equity, and justice. These require investments of time and resources and, most importantly, a commitment at all levels of leadership to providing equity for students with disabilities.

There are other ideas that can contribute to the overall improvement of outcomes and satisfaction for students with disabilities. The Workgroup acknowledges that there may be additional recommendations that address specific issues with which a student with disabilities has struggled. The Workgroup encourages all campus leaders to engage with and listen to students with disabilities in both formal and informal ways. As the landscape for disability inclusion evolves, so must recommendations and ideas.

Beyond this report, the University must continue to study the following in support of success for students with disabilities: What are the factors that contribute to lower rates of inclusion, retention, and completion for students with disabilities? And how can the findings in this report be used to guide contributors to this effort, now and in the future, in supporting students with disabilities as they envision and begin to achieve their academic goals?

Finally, demonstrating progress in these areas and sharing institutional accountability for serving students with disabilities will improve not only the campus experience for students with disabilities, but also the overall learning and growth environment for the entire UC community. Everyone at UC benefits from a truly inclusive, equitable environment whereby every individual can realize their maximum potential.

# **ACKNOWLEDGMENTS**

The Systemwide Advisory Workgroup on Students with Disabilities thanks our partners:

**Directors of Students with Disabilities Services Offices** 

**Institutional Research Offices** 

Institutional Research and Academic Planning, UC Office of the President

**Student Affairs Assessment Team, UC Davis** 

**University of California Graduate and Professional Council** 

**University of California Student Association** 

# APPENDIX A

### **CURRENT STATUS OF RECOMMENDATIONS**

1. RECOMMENDATIONS FOR REGENTS	STATUS	DETAILS
Strengthen Regents' Policy 4400, Policy on University of California Diversity Statement, to emphasize disability accessibility as a diversity issue.	Not Started	Regents' Policy 4400 was last amended in September 2010. In the decade since then, the number of students with disabilities at the University has greatly increased. The policy merits a review by the Board of Regents to determine how it can better reflect the evolution of diversity at the University and the intersectionality of identities in pursuit of greater, truly holistic equity and inclusion.
2. RECOMMENDATIONS FOR UNIVERSITY LEADERS	STATUS	DETAILS
2.1 Undertake policy review of PACAOS 140.00: Guidelines Applying to Nondiscrimination on the Basis of Disability.	In Progress	PACAOS policy 140.00 is overdue for review, given the changing student population at UC. Review will be conducted by UC Legal with input from students with disability. Review began in fall 2023.
2.2 Strengthen systemwide guidance and support for civil rights at UC.	In Progress	A new systemwide Office for Civil Rights will launch in Spring 2024. It will comprise three units: Title IX, Non-discrimination, and Disability Rights.
2.3 Expand the functions of ADA coordinators and consider appointing UC chief accessibility officers to oversee the holistic approach of disability services.	Not Started	Next steps to be determined by the Office for Civil Rights and relevant advisory bodies created therein.
2.4 Ensure that all university websites, online courses, and audio/video content meet required accessibility standards. Ensure that communications with individuals with disabilities are as effective as communications with non- disabled peers, including providing appropriate auxiliary aids and services.	Not Started	Next steps are to be determined by relevant campus leaders (e.g., executive vice chancellors/provosts, VCs for administration, chief technology officers) in consultation with Informational Technology Services at UCOP, the Office for Civil Rights—Disability Rights Office, campus disabled student services leaders, and students.
2.5 Develop student services strategic plans that include:	In Progress	UC vice chancellors for student affairs will request that the UC president appoint a working group to review student
2.5a strategies to achieve and sustain a maximum ratio of 250 undergraduate students with a disability per 1 disability services specialist on each campus, and consider lower ratios for graduate and professional students, to meet the growing demand for accommodations and student services;		Services systemwide. The last review of student services systemwide was conducted in 2007.
2.5b reduce the wait time for initial accommodations meetings with disability services offices to a maximum of 72 business hours; and		
2.5c review and improve the existing processes for requesting and receiving accommodations to identify bottlenecks and barriers.		
2.6 Create dedicated and inclusive spaces on each campus where students with disabilities can gather and develop a shared sense of identity and culture, foster self-esteem, identity development, and a sense of belonging.	Not Started	Some campuses have created spaces that can be models for other campuses. Next steps are for campus leadership to assess this recommendation for future action.
2.7 Update each campus' ADA Transition Plan and remediation schedule so that each campus:	Not Started	Next steps to be determined by campuses upon review of existing plans.
2.7a Identifies physical obstacles limiting access to programs, services, and activities by persons with disabilities.		
2.7b Ensures transportation fleet services include fully accessible vehicle.		
2.7c Identifies, creates and maintains accessible mapping and signage for persons with disabilities to navigate the physical plant.		
2.7d Creates an annual fund for minor capital improvements on each campus to remediate facilities that are most likely to cause harm/be inaccessible to students.		
2.8 Establish/strengthen chancellor-appointed advisory committees.	In Progress	Some campuses have existing advisory committees that can serve as models for other campuses. Next steps to be determined following campuses' review of recommendations.

### **Appendix A: Current Status of Recommendations** *continued*

2. RECOMMENDATIONS FOR UNIVERSITY LEADERS	STATUS	DETAILS
2.9 Create a disability inclusive emergency evacuation plan and procedures on each campus and train key personnel on how to safely evacuate persons with disabilities.	In Progress	Campuses are undertaking a review of evacuation plans as of September 2023.
2.10 Strengthen systemwide guidance and support for civil rights at UC.	In Progress	A new systemwide Office for Civil Rights will launch in Spring 2024. It will comprise three units: Title IX, Non-discrimination, and Disability Rights.
2.11 Expand the functions of ADA coordinators and consider appointing UC chief accessibility officers to oversee the holistic approach of disability services.	Not Started	Next steps to be determined by the Office for Civil Rights and relevant advisory bodies created therein.
2.12 Ensure that all university websites, online courses, and audio/video content meet required accessibility standards. Ensure that communications with individuals with disabilities are as effective as communications with non- disabled peers, including providing appropriate auxiliary aids and services.	Not Started	Next steps are to be determined by relevant campus leaders (e.g., executive vice chancellors/provosts, VCs for administration, chief technology officers) in consultation with Informational Technology Services at UCOP, the Office for Civil Rights—Disability Rights Office, campus disabled student services leaders, and students.
3. RECOMMENDATIONS FOR FACULTY	STATUS	DETAILS
3.1 Design inclusive courses by making courses accessible during the course design or redesign phase rather than trying to make them accessible mid-course or afterward.	In Progress	Some campus models exist. Next steps to be determined by teaching and learning centers in consultation with DSS offices, Academic Senate, and students. Existing models may serve as blueprints for other campuses.
3.2 Designate and support formal faculty liaison(s) to enhance and strengthen communication between faculty, disabled student services, and teaching and learning centers.	Not Started	Next steps to be determined by campuses in consultation with executive vice chancellors/provosts, vice chancellors for equity and inclusion, offices of academic personnel, and DSS offices
3.3 Undertake review of Academic Senate regulations for incomplete grades and academic standing/progress policies more broadly to insure that their local application does not have an unintended disparate impact on undergraduate, graduate and professional students with disabilities.	Not Started	Next steps to be determined by the Academic Senate in consultation with DSS offices and other stakeholders.

## APPENDIX B

### **WORKGROUP DETAIL**

Workgroup Charge, Composition, Materials, and Contributor Detail

### Students with Disabilities Workgroup formal charge:

To achieve equitable experiences for all students at UC and to address the increasing population of students with disabilities at the undergraduate, graduate, and professional student levels, a systemwide advisory workgroup focused on UC students with disabilities is needed. A workgroup of dedicated subject-matter experts, faculty, and students will be responsible for a close examination of the current student experience and will make recommendations for the future culture and practices of UC in support of students with disabilities.

Focusing on student-centered equity, the University of California Systemwide Advisory Workgroup on Students with Disabilities is charged with the following:

- Reviewing existing systemwide and campus policies and practices in:
  - Academic accommodations for students with disabilities, including assistive technologies
  - Physical accommodations for students with disabilities, including on-campus housing, classrooms, laboratories and other facilities
  - Universal design as a tool to increase accessibility and expand inclusion in campus life experiences
  - Analyzing existing data sources and, if necessary, recommending new data collection to gain a deeper understanding of the needs and experiences of students with disabilities
- · Ensuring that analyses are inclusive of intersecting identities and that they address the sense of belonging
- Making recommendations to campus and systemwide leaders on policy changes and/or programmatic improvements to better support students with disabilities

Workgroup members will consist of UC campus representatives with subject-matter expertise in their respective areas as it relates to students with disabilities (e.g., disabled student services, ADA compliance officers, counseling and psychological services, academic advisors, residence life, legal counsel), as well as faculty and students at large.

The advisory workgroup will serve a two-year term, after which the workgroup will provide the provost and executive vice president of the system with a report detailing its findings and recommendations.

### **APPENDIX B: Workgroup Detail** continued

### **Workgroup Membership**

**UC BERKELEY** 

Steve Sutton (Co-Chair)

Vice Chancellor Student Affairs

Kate O'Neill

Associate Dean of Instruction and Student

Affairs

Department of Environmental Science, Policy

and Management

Ella Callow

Assistant Vice Chancellor, ADA/Section 504

Compliance Officer

Department of Disability Access & Compliance

Nathan Tilton

Graduate Student

Anthropology

**UC DAVIS** 

Pablo Reguerín (Co-Chair)

Vice Chancellor Student Affairs

Cory Vu

Associate Vice Chancellor

Health, Wellness and Divisional Resources

Jennifer Billeci

Director

Student Disability Services

UC IRVINE

Crystal Madaule

Senior Associate Director

Office of Financial Aid and Scholarships

UCLA

Jasmine Rush

Interim Dean of Students

Student Affairs

Brooke Wilkinson

Director of Academic Initiatives and Advisor to

Disabled Studies Minor

Department of Undergraduate Education

Connie Kasari

Distinguished Professor of Human Development

and Psychology

Graduate School of Education & Informational

Studies

**UC MERCED** 

Drew Shelburne

Coordinator

**Disability Services** 

UC RIVERSIDE

**Christine Mata** 

Associate Vice Chancellor/Dean of Students

Division of Student Affairs

Paul Larsen

Professor

Biochemistry

Will Pines

Accessible Technology Specialist

Student Disability Resource Center

UC SAN DIEGO

Joanna Boval

Director

Office for Students with Disabilities,

Undergraduate Education

April Bjornsen

Assistant Dean

Graduate Student Affairs & Admissions,

Graduate Division

UC SAN FRANCISCO

Clay Littrell, Co-Director

Student Disability Services

**Wendy Tobias** 

Chief Accessibility and Inclusion Officer/ADA

Coordinator

UC SANTA BARBARA

Lupe Navarro-Garcia

Assistant Vice Chancellor

Student Academic Support Services

Ryan Sims

Associate Director and Academic Counselor

Graduate Division

Amit Ahuja

Associate Professor and Director

Graduate Studies, Department of Political

Science, Faculty-in-Residence

Sophia Lee-Park

Undergraduate Student

Sociology

UC SANTA CRUZ

Karen Nielson

Director

Disability Resource Center, Student Affairs and

Success

UC OFFICE OF THE PRESIDENT

Cynthia Dávalos

Interim Associate Vice Provost

Student and Equity Affairs

Graduate, Undergraduate and Equity Affairs

Ianhavi Bonville

Disability Consultant

Associate Executive Vice Chancellor and Provost

Strategic Initiatives, UCSF

STAFF TO THE WORKGROUP

Belinda Vea

Project and Policy Analyst

Graduate, Undergraduate and Equity Affairs

George Zamora

Project and Policy Analyst

Graduate, Undergraduate and Equity Affairs

### **APPENDIX B: Workgroup Detail** continued

### **Workgroup Consultations**

To learn more about key disability issues, the workgroup met with various involved parties:

- Representatives from the UC Student Association (UCSA) and UC Graduate and Professional Council (UCGPC)
- Campus Disabled Student Services (DSS) Directors
- Campus ADA Coordinators/Compliance Officers (ADACO)
- Representatives from UC Graduate Programs
- Representatives from the UC Santa Cruz Center for Innovations in Teaching and Learning (CITL)
- Representatives from various UCOP units including Graduate Programs, UC Legal, Ethics, Compliance and Audit Services (ECAS), and Capital Programs

The SDWG co-chairs also held separate meetings with:

- Former Provost Michael T. Brown
- UC Academic Senate University Committee on Affirmative Action and Diversity (UCAAD)
- UC Academic Senate University Committee on Educational Policy (UCEP)
- UC Academic Senate University Coordinating Committee on Graduate Affairs (UCCGA)
- UC Deans of Undergraduate Education
- UC Vice Chancellors of Student Affairs (VCSA)

Reports and data consulted:

- Reports published by student organizations (UCSA/UCGPC, UC Access Now) that outlined recommendations to better support students with disabilities
- Relevant literature, articles, and reports from national disability associations and organizations including the Association for Higher Education and Disability (AHEAD)
- Data from the UC Undergraduate Experience Survey (UCUES) and the UC Graduate and Professional Students Experience Survey (UCGSES) and data collected from the DSS Directors on the number of students enrolled, types of diagnosed disabilities, accommodations provided, and costs of resources.

### **Student Advocacy**

Student advocacy has played a significant role in raising awareness and visibility about the challenges experienced by students with disabilities; repeated advocacy by multiple groups has successfully brought the challenges faced by students with disabilities to the forefront.

Student advocacy groups raising awareness on this issue included:

- UC Student Association (UCSA), the undergraduate student government association
- UC Graduate and Professional Council (UCGPC)
- UC Access Now, an informal nonprofit coalition of students, staff, and faculty working for accessibility and inclusion for all disabled people in the UC community

Examples of campaigns and initiatives that the Workgroup learned from include:

- UCSA "WeAre3D" campaign, now known as ACQUIRE, focused on raising awareness and support for students with disabilities (since 2017)
- UC Access Now and its "Demandifesto," (2020), outlining measures for increasing current support for disabled UC students, faculty, and staff on UC campuses and providing a framework on how to best support UC's communities with disabilities

# APPENDIX C

### **AMERICANS WITH DISABILITIES ACT**

### **ADA LANGUAGE:**

- "[H]istorically, society has tended to isolate and segregate individuals with disabilities, and, despite some improvements, such forms of discrimination against individuals with disabilities continue to be a serious and pervasive social problem."
- "[D]iscrimination against individuals with disabilities persists in such critical areas as employment, housing, public accommodations, education, transportation, communication, recreation, institutionalization, health services, voting, and access to public services."
- "[I]ndividuals with disabilities continually encounter various forms of discrimination, including outright intentional exclusion, the discriminatory effects of architectural, transportation, and communication barriers, overprotective rules and policies, failure to make modifications to existing facilities and practices, exclusionary qualification standards and criteria, segregation, and relegation to lesser services, programs, activities, benefits, jobs, or other opportunities."

# APPENDIX D

### OFFICE OF ETHICS AND COMPLIANCE GUIDANCE DETAIL

The University of California is required to engage in an "Interactive Process" to determine appropriate academic accommodations. During this process, students work with their Disability Services Office (DSO) to determine individualized accommodations on a case-by-case basis. The DSO then issues an Accommodations Letter (AL). If you are presented with a request for accommodation, the following guidance will ensure you, and the University, remain in compliance with our legal obligations.

#### THE ACCOMMODATIONS PROCESS

- Unless you have a concern, implement accommodations immediately upon receipt of an Accommodation Letter (AL).
- Promptly raise concerns with your <u>Disability Services Office</u> (DSO).
   Time is of the essence in providing accommodations. Do not deny an accommodation before consulting the DSO.
- Do not ask for documentation or information about a student's disability beyond the AL.
- Do not disclose or comment upon a student's disability or accommodation in the classroom or elsewhere except as necessary to implement an accommodation.
- Do not provide disability-related accommodations without an AL;
   Refer students to the DSO.
- Requests for flexibility for temporary illness (like a common cold) or non-disability related reasons are not accommodations under the ADA.

#### **FUNDAMENTAL ALTERATION AND UNDUE BURDEN**

- Fundamental Alteration (FA) and Undue Burden (UB) defenses are rare.
- When you have a concern, consult with the <u>DSO</u> before refusing to implement an accommodation.
- The law requires a specific, deliberative process to determine whether an accommodation is an FA or UB.
- Part of the FA process requires faculty to demonstrate the nexus between learning outcomes and course requirements.
- If an accommodation is found to fundamentally alter a course/ program, faculty must consider alternative accommodations.
- Work with the DSO to implement interim accommodations during the FA/UB process.
- Consult the campus ADA Coordinator, as necessary.

### **AUXILIARY AIDS AND SERVICES**

- Auxiliary Aids and Services (AAS) allow students to access and engage course materials and lectures and effectively communicate in the classroom or laboratory setting.
- Faculty and DSO must work together to ensure a student timely receives approved AASs.
- Class Recording is an AAS specifically allowed under law and UC policy.
- Class Recording is rarely a Fundamental Alteration or Undue Burden; Consult with the DSO before denying this as an accommodation.
- Students approved for a Class Recording accommodation may be required to sign an agreement that prohibits unauthorized sharing of classroom recordings.

### **SERVICE AND SUPPORT ANIMALS**

- Service and Support Animals are treated differently under the law.
- Service Animals are almost always allowed in public spaces (including classrooms) without an AL and can be successfully integrated into most laboratory settings.
- Support Animals (commonly called Emotional Support Animals (ESAs) may be allowed in a classroom or laboratory as an approved accommodation (i.e., an AL will document this need).
- If a student brings an animal to class without an Accommodation Letter, contact the DSO before addressing an animal with the student.
- Do not comment on, pet, or otherwise engage with a Service or Support Animal. Service Animals are working; Support Animals are providing disability- related support.

If you have questions about the university's obligations under various disability laws, contact your campus ADA Coordinator.

### **APPENDIX D: Office of Ethics and Compliance Guidance Detail** continued

### **ACADEMIC ACCOMMODATIONS: DEFINITIONS**

**Accommodation Letter**: The term Accommodation Letter ("AL") describes the documents issued by the DSO to indicate a student has an approved accommodation. These may be called "Notices of Accommodation," "Accommodation Letters," "Instructor Letters," etc. depending on the campus.

**Disability**: Either (a) A physical or mental impairment that substantially limits one or more of the major life activities of an individual; (b) a record of such an impairment; or (c) being regarded as having such an impairment.

**Disability laws**: The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act protect the civil rights of people with disabilities in many aspects of public life, including higher education. References to these laws within the guidance documents refers to their text as well as the ADA regulations, various judicial decisions that have interpreted them, and the Office of Civil Rights' application of disability laws. The Fair Employment and Housing Act is also referenced.

**Disability Services Office (DSO)**: The term Disability Services Office "DSO" describes all offices in the UC System that provide academic accommodations services to students. These offices may go by different names across the system, such as "Center for Accessible Education," "Disabled Students Program," or "Student Disability Center" to name a few. Please see the <u>DSO Contact</u> list for information on how to contact the office on your campus that approves academic accommodations.

**Interactive Process**: A term derived from Title I that most courts apply in the higher education context to mean a deliberative process between a university and a student requesting an accommodation which requires a fact-specific, case-by-case inquiry to arrive at a conclusion about implementation of the request.

**Fundamental Alteration**: Alterations or adjustments to courses or programs that either (a) modify academic requirements that are essential to the instruction being pursued or related to a licensing requirement, (b) lower academic standards, or (c) substantially alter the course or program.

**Qualified Student with a Disability**: A student with a <u>disability</u> who, with or without reasonable modifications to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of <u>auxiliary aids and services</u>, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a <u>public entity</u>.

# APPENDIX E

### ADDITIONAL UCUES DATA ON CLIMATE AND STUDENT EXPERIENCE

The following provides further detail on key findings from the University of California Undergraduate Experience Survey (UCUES) as it pertains to various aspects of the undergraduate student experience of students self-identified as having a disability. The survey is administered in the spring of alternate years and solicits student opinions on a broad range of academic and co-curricular experiences, along with capturing key demographic characteristics of respondents. Report authors took the information below from the 2020 and 2022 administrations of UCUES on set questions.

Among UCUES respondents who indicated they had one or more "conditions or disabilities that significantly [affected their] experience as a [University of California student] ('including how [they] learn or perform academically, interact with others, or access campus')," the percentage who indicated they were "currently [receiving] accommodations from [their] university due to [their] disability/condition" rose from 19 percent in 2020 to 29 percent in 2022.

Overall, respondents who indicated they had a "learning disability or condition" were most likely to indicate they were receiving disability-related accommodations from their campus, while students who indicated they had an "emotional or mental health concern or condition" were least likely to indicate they were receiving disability-related accommodations from their campus.

### **Belonging**

The survey asked respondents to indicate how strongly they agreed or disagreed with the statement "I feel that I belong at this campus." Only 45 percent (2020 UCUES) and 47 percent (2022 UCUES) of students who self-identified as having one or more disabilities agreed or strongly agreed with this statement, whereas 56 percent (2020 UCUES) and 57 percent (2022 UCUES) of student respondents who did not select having a disability agreed or strongly agreed with this statement. It's important to note that across most self-identified disability conditions, there was a slight increase in agreement with the statement between the 2020 and 2022 UCUES survey responses.

Percentage of respondents who selected either 'agree' or 'strongly agree' in response to the statement 'I feel that I belong at this campus'	UCUES 2020	UCUES 2022
No disability(ies) selected	<b>56%</b> (11913/21246)	<b>57%</b> (21157/37089)
One or more disability(ies)	<b>45%</b> (11871/26357)	<b>47%</b> (7244/15385)
Neurodevelopmental/cognitive disability or condition	<b>44%</b> (1707/3919)	<b>47%</b> (1833/3896)
Learning disability or condition	<b>43%</b> (1029/2418)	<b>47%</b> (732/1569)
Emotional or mental health concern or condition	<b>44%</b> (10445/23692)	<b>45%</b> (5544/12212)
Physical disability or condition	<b>45%</b> (1194/2645)	<b>49%</b> (658/1349)
Other disability or condition	<b>49%</b> (591/1212)	<b>46%</b> (351/760)

### APPENDIX E: Additional UCUES Data on Climate and Student Experience continued

### **Respected on Campus**

Students were asked to indicate how strongly they agreed or disagreed with the statement "Students with a disability or condition like mine are respected on this campus." Students who self-identified as having a disability tended to agree less strongly with the statement than those who did not. This statistically small but meaningful difference was observed in both the 2020 and 2022 UCUES data and was detected for both the combined and the individual disability categories relative to the students without a disability category.

Percentage of respondents who selected either 'agree' or 'strongly agree' in response to the statement 'Students with a disability or condition like mine are respected on this campus'	UCUES 2020	UCUES 2022
No disability(ies) selected	73%	71%
	(7975/10913)	(8401/11886)
One or more disability(ies)	52%	46%
	(8777/16839)	(4505/9751)
Neurodevelopmental/cognitive disability or condition	42%	39%
	(1387/3270)	(1222/3136)
Learning disability or condition	44%	46%
	(910/2084)	(599/1308)
Emotional or mental health concern or condition	51%	44%
	(7568/14768)	(3229/7376)
Physical disability or condition	41%	41%
-	(731/1797)	(473/1163)
Other disability or condition	49%	46%
•	(445/908)	(234/513)

### **Negative or Stereotypical Views of Staff or Faculty**

Generally, both students with disabilities and those without express hearing faculty, staff, or administrators expressing negative or stereotypical views about physical, learning, or psychological disabilities at relatively low rates. However, students with disabilities note hearing such expressions at higher frequencies than those without. In 2022, roughly 93 percent of students without disabilities reported hearing such negative or stereotypical expressions "never" or "rarely," while 90 percent of students with disabilities reported never or rarely having heard such expressions over the course of the academic year. Among students who self-identified as having a learning disability, this percentage drops to 82 percent, indicating the remaining 18 percent recalled hearing negative or stereotypical expressions about physical, learning ,or psychological disabilities "occasionally," "somewhat often," "often," or "very often."

### **APPENDIX E: Additional UCUES Data on Climate and Student Experience** continued

### **Satisfaction with Social or Academic Experience**

Overall, students with disabilities were less satisfied with both their academic experience and social experience at their campus than students without a disability. In 2022, 66 percent of students without a disability indicated they were either satisfied or very satisfied with their overall academic experience; this number drops to 57 percent among students who indicated they had a disability.

Percentage of respondents who selected either 'satisfied' or 'very satisfied' in response to the statement 'How satisfied are you with the following aspect of your campus experience/education: overall academic experience'	UCUES 2020	UCUES 2022
No disability(ies) selected	<b>50%</b> (10638/21216)	<b>66%</b> (24530/37131)
One or more disability(ies)	<b>41%</b> (10856/26336)	<b>57%</b> (8836/15404)
Neurodevelopmental/cognitive disability or condition	<b>38%</b> (1504/3922)	<b>55%</b> (2160/3908)
Learning disability or condition	<b>41%</b> (986/2417)	<b>56%</b> (879/1572)
Emotional or mental health concern or condition	<b>40%</b> (9578/23672)	<b>57%</b> (6915/12223)
Physical disability or condition	<b>41%</b> (1077/2642)	<b>57%</b> (771/1350)
Other disability or condition	<b>43%</b> (522/1213)	<b>55%</b> (419/764)

Percentage of respondents who selected either 'satisfied' or 'very satisfied' in response to the statement 'How satisfied are you with the following aspect of your campus experience/education: overall social experience'	UCUES 2020	UCUES 2022
No disability(ies) selected	<b>47%</b> (10058/21220)	<b>50%</b> (18447/37016)
One or more disability(ies)	<b>38%</b> (10113/26343)	<b>40%</b> (6166/15353)
Neurodevelopmental/cognitive disability or condition	<b>37%</b> (1459/3921)	<b>40%</b> (1550/3899)
Learning disability or condition	<b>38%</b> (912/2420)	<b>40%</b> (626/1565)
Emotional or mental health concern or condition	<b>38%</b> (8887/23676)	<b>39%</b> (4752/12190)
Physical disability or condition	<b>37%</b> (976/2645)	<b>41%</b> (549/1344)
Other disability or condition	<b>38%</b> (464/1213)	<b>38%</b> (284/756)

### APPENDIX F

### **REFERENCES**

AHEAD, Association on Higher Education and Disability. https://www.ahead.org/home

California Building Standards Code, (2022). https://www.dgs.ca.gov/BSC/Codes

California Department of General Services, Department of Technology. Information Technology Policy §4833, (2017). <a href="https://www.dgs.ca.gov/Resources/SAM/TOC/4800">https://www.dgs.ca.gov/Resources/SAM/TOC/4800</a>

California Department of Rehabilitation §7405 and §11546.7 (2019). https://www.dor.ca.gov/Home/Laws

Disability Rights California. California's Unruh Civil Rights Act (Civil Code §51) and Disabled Persons Act (Civil Code §54 – 55.32) (CDPA). <a href="https://www.disabilityrightsca.org/publications/disability-discrimination-fact-sheet-business-and-other-public-accommodations#:~:text=California's%20Unruh%20Civil%20Rights%20Act,businesses%20that%20receive%20state%20funds.

National Disability Authority, Centre for Excellence in Universal Design. 7 Principles of Universal Design (1997). https://universaldesign.ie/what-is-universal-design/the-7-principles

- U.S. Department of Education. Individuals with Disabilities Education Act (2004, IDEA). https://sites.ed.gov/idea/about-idea
- U.S. Department of Justice, Civil Rights Division. Americans with Disabilities Act (ADA) of 1990, as Amended (2008). https://www.ada.gov/law-and-regs/ada
- U.S. Department of Justice, Civil Rights Division. Americans with Disabilities Act (ADA) of 1990, §508 of the Rehabilitation Act of 1973, (1973). <a href="https://www.justice.gov/crt/section-508-home-page-0#:~:text=Section%20508%20of%20the%20">https://www.justice.gov/crt/section-508-home-page-0#:~:text=Section%20508%20of%20the%20</a> Rehabilitation,disabilities%2C%20unless%2Ocertain%20exceptions%20apply
- U.S. Department of Labor, Occupational Safety and Health Act (OSHA) of 1970, (1970). https://www.osha.gov/laws-regs/oshact/completeoshact
- U.S. Department of Labor. Rehabilitation Act of 1973 Section 504. <a href="https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-504-rehabilitation-act-of-1973">https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-504-rehabilitation-act-of-1973</a>
- U.S. Department of Transportation, The Federal Highway Administration Proposed Rights of Way Accessibility Guidelines (PROWAG), (2011). <a href="https://highways.dot.gov/safety/pedestrian-bicyclist/safety-tools/r3062-public-right-way-accessibility-guidelines-prowag#:~:text=The%20guidelines%20ensure%20that%20sidewalks,usable%20by%20pedestrians%20with%20disabilities</a>

University of California Emergency Safeguards, Security and Emergency Management, (2023). <a href="https://www.ucop.edu/enterprise-risk-and-resilience/crisis-management.html">https://www.ucop.edu/enterprise-risk-and-resilience/crisis-management.html</a>

University of California Event Ready Principles & Practices, (2015). <a href="https://www.ucop.edu/research-policy-analysis-coordination/files/MOU\_AnimalCare\_EmergencyDisaster.pdf">https://www.ucop.edu/research-policy-analysis-coordination/files/MOU\_AnimalCare\_EmergencyDisaster.pdf</a>

University of California Facilities Manual, (2023). https://www.ucop.edu/construction-services/facilities-manual/index.html

University of California - Policy IMT-1300, (2013), IT Accessibility Policy. https://policy.ucop.edu/doc/7000611/IMT-1300

University of California – Policy PACAOS-140, Policies Applying to Campus Activities, Organizations and Students (PACAOS) 140.00 Guidelines applying to nondiscrimination because of disability. (1994).

https://policy.ucop.edu/doc/2710534/PACAOS-140

World Wide Web Consortium (W3C), Web Content Accessibility Guidelines (WCAG 2.0). https://www.w3.org/TR/WCAG20

### **Appendix F: References** continued

### **List of Further Readings**

Bocardo-Aguilar, S., Cunanan, & M., Gomez, C., (2022). UCSA *Recommendations to UC Systemwide Workgroup on Students with Disabilities*, UCSA 2022 *ACQUIRE Campaign: Disability Justice -Fund Our Services!* (PowerPoint slides). The 2022 University of California Systemwide Advisory Workgroup on Students with Disabilities.

Buder, S. & Perry, R. (2023). The social model of disability explained. In Braren, S. & Putrino, D., (Eds.), Social Creatures. https://www.thesocialcreatures.org/thecreaturetimes/the-social-model-of-disability?fbclid=lwAR1CKKDPK8Tz\_ Lc/zLtHiP425UzdLKJQXFgW5HeLpMr-ycjivhJ-jgWQJ\_l&format=amp

CAS Learning and Development Outcomes, CAS Contextual Statement (2008). https://www.cas.edu/learningoutcomes

Eckes, S.E. & Ochoa, T.A., (2005 Summer). Students with disabilities: transitioning from high school to higher education. American Secondary Education 33(3), Summer 2005.

https://www.jstor.org/stable/41064551?read-now=1&seq=1&x=-152.36972713815533&y=29.656012422148553&w=912.369727 1381553&h=944.5122447258633&index=0#page\_scan\_tab\_contents

Hinz, S., Arbeit, C., & Bentz, A. (2017). *Characteristics and outcomes of undergraduates with disabilities*. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics. <a href="https://nces.ed.gov/pubs2018/2018432.pdf">https://nces.ed.gov/pubs2018/2018432.pdf</a>

Journal of Postsecondary Education and Disability (2023). Special Issue: Including disability-related topics in postsecondary courses and professional development. 36(1). AHEAD Association on Higher Education and Disability. <a href="https://www.ahead.org/professional-resources/publications/jped">https://www.ahead.org/professional-resources/publications/jped</a>

Lewis, L., Farris, E., & Greene, B., (1999 August). *An institutional perspective on students with disabilities in postsecondary education*. National Center For Education Statistics – A Statistical Report, August 1999. National Center For Education Statistics, U.S. Department of Education, Office of Educational Research and Improvement NCES 1999-046. <a href="https://nces.ed.gov/pubs99/1999046.pdf">https://nces.ed.gov/pubs99/1999046.pdf</a>

Lu, A., (2022, April 12). Some colleges are ending hybrid learning. The Chronicle of Higher Education. <a href="https://www.chronicle.com/article/some-colleges-are-ending-hybrid-learning-students-are-pushing-back">https://www.chronicle.com/article/some-colleges-are-ending-hybrid-learning-students-are-pushing-back</a>

Mineo, E., Mifsud, K., Lindholm, C., Gurba, A., & Waisman, T. C. (2022). *Building neurodiversity-inclusive postsecondary campuses: recommendations for leaders in higher education*. Autism in Adulthood. 0(0). DOI: 0.1089/aut.2021.0042 https://www.liebertpub.com/doi/10.1089/aut.2021.0042

Meeks, L.M., Neal-Boylan, L. (2020). *Disability as diversity: A guidebook for inclusion in medicine, nursing, and the health professions*. Springer Link. ISBN 978-3-030-46186-7 ISBN 978-3-030-46187-4 (eBook) <a href="https://doi.org/10.1007/978-3-030-46187-4">https://doi.org/10.1007/978-3-030-46187-4</a>

Murray, C., Wren, C.T., Stevens, E.B., Keys, C. (2009). *Promoting university faculty and staff awareness of students with learning disabilities: An overview of the productive learning u strategies (PLuS) project.* Department of Education. <a href="https://files.eric.ed.gov/fulltext/E]868136.pdf">https://files.eric.ed.gov/fulltext/E]868136.pdf</a>

NCCSD Research Brief (National Center for College Students with Disabilities) (2021, June). Research brief supporting undergraduate students with disabilities: A focus on campus climate and sense of belonging. <a href="https://files.eric.ed.gov/fulltext/ED577464.pdf">https://files.eric.ed.gov/fulltext/ED577464.pdf</a>

National Center for Education Statistics (2020). <a href="https://nces.ed.gov/programs/digest/d20/tables/dt20\_311.10.asp">https://nces.ed.gov/programs/digest/d20/tables/dt20\_311.10.asp</a> and <a href="https://nces.ed.gov/fastfacts/display.asp?id=60">https://nces.ed.gov/fastfacts/display.asp?id=60</a>

&sw=w&userGroupName=anon%7Ea83ec0a0&aty=open-web-entry

Paul, S., (2020, June). Students with disabilities in higher education: a review of the literature.

https://go.gale.com/ps/i.do?id=GALE%7CA131318266&sid=googleScholar&v=2.1&it=r&linkaccess=abs&issn=01463934&p=AONE

### **Appendix F: References** continued

Post Secondary National Institute (2022 October). *Students with Disabilities in Higher Education*. <a href="https://pnpi.org/wp-content/uploads/2022/10/StudentswithDisabilities">https://pnpi.org/wp-content/uploads/2022/10/StudentswithDisabilities</a> October 2022.pdf

Tobias, W., (2023 Ma7). *Disability identity, belongingness, and persistence in students with disabilities in higher education*. <a href="https://scholarworks.calstate.edu/concern/theses/df65vf48s">https://scholarworks.calstate.edu/concern/theses/df65vf48s</a>

UC NOW Demandifesto (2020, July 26) Demands for universal design, accessibility, and inclusion for the disabled students, staff, and faculty of the University of California on the thirtieth anniversary of the Americans with Disabilities Act. <a href="https://archive.org/details/disability-equity-and-justice-demands">https://archive.org/details/disability-equity-and-justice-demands</a>

University of California Board of Regents Item: Annual report on student health and counseling centers and the UC student health insurance plan (2022, February 16). <a href="https://regents.universityofcalifornia.edu/regmeet/feb22/h3.pdf">https://regents.universityofcalifornia.edu/regmeet/feb22/h3.pdf</a>

University of California Centers for Teaching & Learning (UC CTLs) Accessible Teaching Programs & Resources (2023). UC CTLs accessible teaching report (2023).

https://docs.google.com/document/d/1RfpRDulWq7aqstNnCeAZ29vppOvh|jDko1u7HXb0]uw/edit

University of Washington, Disabilities, Opportunities, Internetworking, and Technology (DO-IT), (2023, October 23). Statistics. <a href="https://www.washington.edu/doit/statistics">https://www.washington.edu/doit/statistics</a>

Welding, L. (2023, March 29). Students with disabilities in higher education: facts and statistics.

 $\frac{\text{https://www.bestcolleges.com/research/students-with-disabilities-higher-education-statistics/\#:\sim:text=The\%20six\%2Dyear\%20}{\text{graduation}\%20\text{rate,receive}\%20\text{accommodations}\%20\text{from}\%20\text{their}\%20\text{school}}$ 

## **ENDNOTES**

- <sup>1</sup>International Classification of Functioning, Disability and Health, World Health Organization.
- <sup>2</sup>Disability Data from the American Community Survey asks about six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.
- <sup>3</sup>Postsecondary National Policy Institute—Students with Disabilities in Higher Education. https://pnpi.org/wp-content/uploads/2022/10/StudentswithDisabilities\_October2022.pdf
- <sup>4</sup>Erickson, W. Lee, C., & von Schrader, S. (2023). 2021 Disability Status Report: California. Ithaca, NY: Cornell University Yang Tan Institute on Employment and Disability (YTI).
- <sup>5</sup>This figure reports those who have sought out and received an accommodation and not the total population of students with disabilities.
- <sup>6</sup>UC Campus Disabled Students Services offices, 2020–21
- <sup>7</sup>28 C.F.R. § 35.108(b)(2).
- <sup>8</sup>Undergraduates identified by campus Disability Support Service (DSS) unit verification process. Non-self-reported students.
- <sup>9</sup>U.S. Department of Education Office for Civil Rights, <u>Annual Report for Fiscal Year 2022</u>, p. 8 ("Typically over the years, the majority of the complaints received have raised disability concerns.").
- <sup>10</sup>42 U.S.C. § 12101(b)(1).
- <sup>11</sup>42 U.S.C. § 12101(b)(2).
- 1242 U.S.C. § 12101(b)(4).
- <sup>13</sup>42 U.S.C. § 12132; 28. C.F.R. § 35.130(a).
- <sup>14</sup>https://www.ahead.org/professional-resources/information-services-portal/data-collection-and-management/performance-indicators
- $^{15}$ Data for Native American/American Indian students and Pacific Islanders were omitted due to small sample sizes.
- <sup>16</sup>https://thekelsey.org/wp-content/uploads/2023/10/Kelsey\_InclusiveDesignStds\_NeueHaasGroteskPro\_Updates-Sep-2023-1. pdf
- <sup>17</sup>https://policy.ucop.edu/doc/2710534/PACAOS-140

# UNIVERSITY OF CALIFORNIA

University of California Office of the President 1111 Franklin Street Oakland, CA 94607

ucop.edu