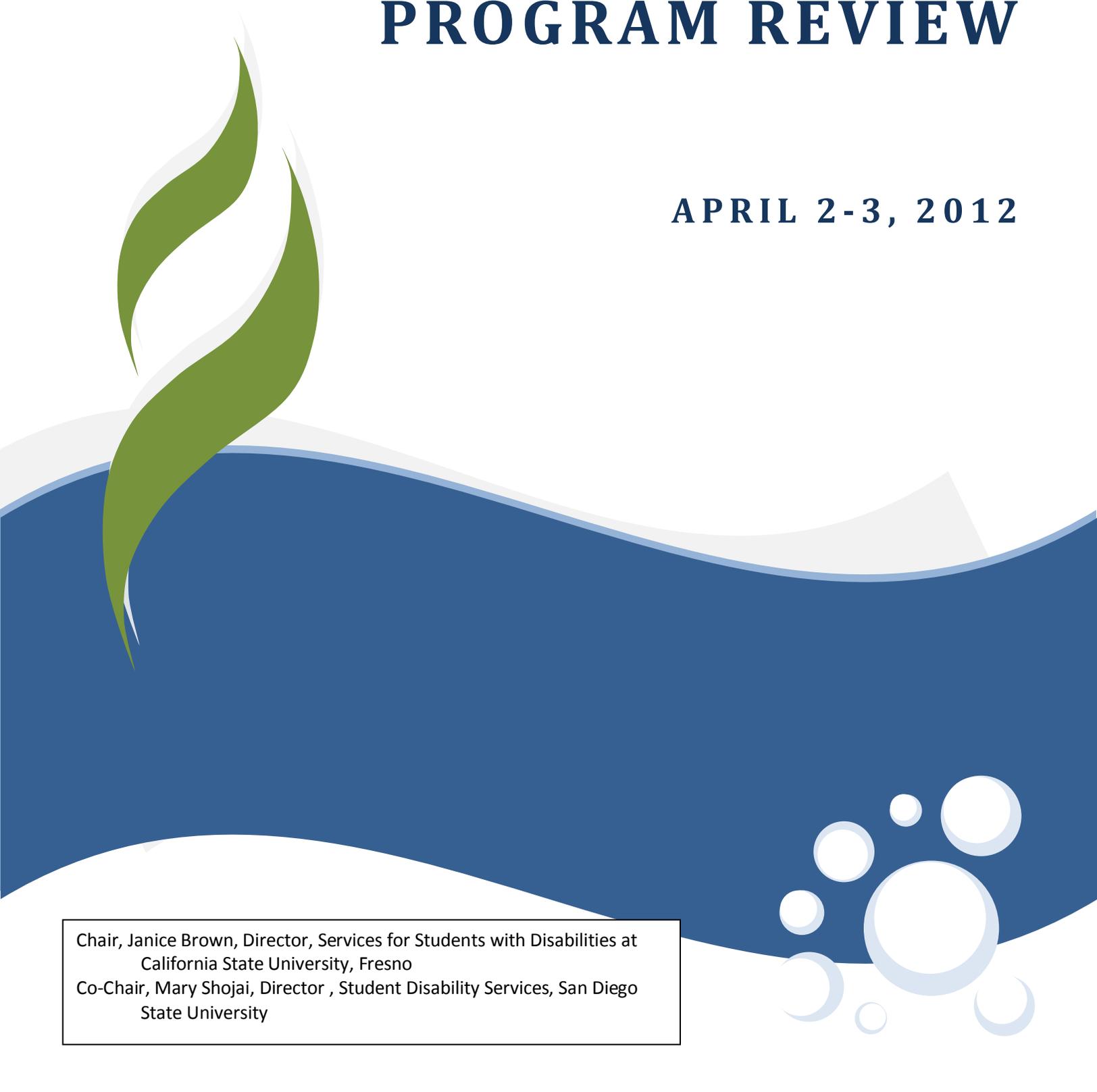


California State Polytechnic University, Pomona

DISABILITY RESOURCE CENTER

PROGRAM REVIEW

APRIL 2-3, 2012



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PROGRAM REVIEW

FOR THE

DISABILITY RESOURCE CENTER

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On-Site Review Conducted April 2-3, 2012
Final Report Submitted May 14, 2012

PROGRAM REVIEW

CALIFORNIA STATE POLYTECHNIC UNIVERSITY, POMONA

DISABILITY RESOURCE CENTER

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EXECUTIVE SUMMARY

In April 2012, the Disability Resource Center (DRC) completed the Program Review that included close examination of services, usage, environment, and challenges. In collaboration with the DRC Director and staff, the program review was completed by Janice Brown, Director of Services for Students with Disabilities at California State University, Fresno and Mary Shojai, Director of Student Disability Services at San Diego State University. An onsite program review of the DRC at Cal Poly Pomona was conducted on April 2-3, 2012. Prior to the visit, the team reviewed DRC program materials and the DRC website.

Program Review Objectives:

As part of the program review, the team was required to complete an evaluation of the following areas: An assessment of the department's mission, programs, services, and performance in the area of services to students with disabilities. In addition the review team examined overall assessment for diversity, equity and access; organizational structure; resources; university-wide physical and virtual accessibility and compliance; assessment & evaluation; current practices, initiatives, and objectives in relation to the Division's strategic plan and in line with CAS Standards for Disability Support Services; impact of staffing; impact of technology; the capacity to manage changing needs related to Section 504 and 508, ADA Amendments, and increasing populations of students with autism spectrum disorders, traumatic brain injuries, and mental health disabilities within the university community.

Budget Recommendations:

Disability services programs throughout the state have experienced unprecedented budget cuts during the past two years. With the continuing budget crisis in the state of California, the future remains unsettled at best. Specific budget recommendations are discussed in detail as part of the Final Recommendations.

Strengths of the Program:

Satisfaction with the DRC is high. Students note the energy and dedication of the faculty and staff and express appreciation for support and assistance in becoming successful in their educational and future career endeavors. On a stretched budget and limited man hours, the program routinely goes out of its way to focus on students first. Everyone in the DRC is a strong advocate for the rights of students with disabilities to equal access to instruction, the web, and buildings and grounds. Collaborative efforts are strong and the DRC is focused on relationship building throughout the institution.

Suggestions for Improvement

Initial impressions of areas that could be improved include the following: clear articulation of fiscal responsibility for accessibility services provided by the DRC to the campus outside of providing academic accommodations for students; restructuring of technology services and support; increased funding for data tracking systems; possible realignment of or addition to DRC key personnel. Further details and recommendations are provided as part of the Final Recommendations.

INTRODUCTION

The Disability Resource Center (DRC) is responsible for administering reasonable accommodations and support services to students with disabilities. These accommodations are mandated by Sections 504 and 508 of the Rehabilitation Act of 1973, as amended in 1998; The Americans with Disabilities Act of 1990, as amended in 2008; and The California State University Policy for Provision of Accommodations and Support Services for Students with Disabilities.

The DRC is designated as the campus authority to verify disabilities and to prescribe specific accommodations for students with documented disabilities. Individualized accommodation plans are authorized to enable students to compete academically on an equal basis with their non-disabled peers. Academic accommodations and support services are available to students who have mobility, visual, or hearing impairments, chronic health conditions, and attention, learning or psychological disorders. Students with temporary disabilities (e.g., broken arm, sprained ankle) may also be served.

Program Review Responsibilities

The responsibilities of the Program Review Team members were to:

- Review the preparatory documents submitted by the Disability Resource Center (DRC)
- Conduct an on-site visit and interview DRC staff and students, campus partners, and campus leadership
- Provide initial verbal feedback based on observations at the conclusion of the visit
- Prepare a preliminary written review by Friday April 20, 2012
- Prepare a comprehensive report with recommendations based on the criteria below by Monday, May 14, 2012

FOCUS OF THE EVALUATION

DRC Program Review: Assessment of the department's mission, programs, services, performance in the area of services to students with disabilities and overall assessment for diversity, equity and access.

Organizational Structure – Assessment of the leadership, department staffing model, organizational reporting structure, human resources areas, campus & external relations, and implications of staffing cuts.

Resources: Assessment of financial management, facilities, technology, and equipment

University-wide: Assessment of the physical and virtual accessibility and compliance with EO 926 and the Accessible Technology Initiative.

Assessment & Evaluation –Assessing of the level of a culture of evidence, student learning outcomes, legal compliance and ethical standards, and CSU system compliance audits

An important part of the program review was to assess current practices, initiatives, and objectives in relation to the Division's strategic plan and in line with CAS Standards for Disability Support Services. Alignment with the University divisional values and initiatives was assessed as well as a review of the value they bring to the University.

EVIDENCE AND DATA COLLECTION

Indicators

A successful review will be measured first by the guidelines which direct the programs and services of the Disability Resources Center (DRC) from the federal, state, CSU system and local campus levels. In addition some of the measurable or observable elements that will indicate success of the program and its effects are the relationships and collaborative efforts made with other programs and individuals on campus; student learning outcomes as a result of the programs and services offered by the DRC and impact on overall campus accessibility.

Federal, State, CSU system and local campus directives to the DRC.

- Federal: Rehabilitation Act of 1973: Section 504 and Section 508
- Americans with Disabilities Act of 1990 and ADAAA of 2008
- The California State University Board of Trustees Policy on Disability Support and Accommodations – Executive Order Number 926
- California State University Policy for the Provision of Accommodations and Support Services to Students with Disabilities – Code AA-2009-27
- California State University Code AA-2007-04 and subsequent amendments pertaining to the Accessible Technology Initiative (ATI)
- University Divisional Values and Initiatives
- Division of Student Affairs Strategic Plan

Data Collection & Resources

DRC provided a broad range of materials in advance related to assessment; diversity; equity and access; ethics; human resources; legal issues; programs; facilities; technology and equipment; Fiscal; leadership; mission; and organization and management.

- April 2-3, 2012, an on-site review was performed by the full review team. Agenda is attached, Appendix A.
- The DRC and Student Affairs websites were reviewed
- A CAS Self-Assessment for Disability Support Services was completed by the DRC in August 2006. Details from this assessment were also considered as part of this review.

CONCLUSIONS, EVALUATIONS AND INTERPRETATION

DRC Program Review in relation to serving students with disabilities

- **Mission:**

Disability Resource Center Mission Statement

In collaboration with the campus community, promotes equal access and opportunity for individuals with disabilities in all aspects of university life by enhancing personal, academic, and career development. The DRC further seeks to empower students to fulfill their potential through self-knowledge, life-long learning, and growth.

The mission of the DRC embraces student learning and development in the academic, social, personal, and vocational realms.

The DRC and the greater institution work together to aid student learning, development, and preparation for future careers. The DRC provides students with disabilities with the opportunities to access environments on campus that will give them hands-on experience to progress their education, skills, and personal development.

- **Programs & Services**

Detailed step-by-step flowcharts are in place for each major service activity of the DRC to allow for an understanding of all staff functions and procedures.

Review of DRC Programs and Services

Disability Related Counseling: DRC counselors provide support in managing students' disability-related needs, thus enabling them to maximize their potential and achieve their educational and vocational objectives.

Hearing-Impaired Services: Sign Language/Oral Interpreters and Real-time Captioning (RTC) services for registered deaf/hard of hearing Cal Poly students and faculty.

Notetaking Services: Notetaking services are provided for qualified DRC students.

Alternate Media Services: Alternative to standard printed academic materials such as textbooks, lab manuals, class handouts, tests, etc. Online request forms area available.

Assistive Technology Center: A computing lab operated by the DRC and dedicated exclusively for use by DRC-registered students. It is currently the only campus lab devoted to providing a fully-accessible, supportive computing environment

Testing Services: Alternative testing accommodations which may include, but are not limited to, extended testing time, a distraction-reduced environment, and/or the use of adaptive equipment.

ARCHES: A TRIO Student Support Services program that offers at-risk undergraduate students who are registered with the DRC tutoring services, a chance to learn more about themselves and opportunities to meet other students in a supportive and nurturing community.

- **Overall performance:**

The DRC program is directed by a team of very experienced professionals and this represents the core strength of the unit. Catherine Schmitt Whitaker, the Program Director, has brought a wealth of knowledge and experience to the team. She has managed the DRC program with quality leadership and through collaborations with staff, faculty and administrators campus-wide has helped the DRC to be a well known and recognized organization throughout the campus. This awareness allows the DRC staff to provide effective services and accommodations and promote student success for the students it serves. The program is on point with regard to its learning outcomes and, with the exception of funding challenges that hamper needed staff hiring and technology upgrades, the DRC is poised for a positive and productive future.

- **Overall assessment for diversity, equity and access.**

The DRC provides opportunities for nurturing diversity by identifying and being sensitive to students' diverse and unique needs. Furthermore, the Access & Disability Alliance (ADA) and the ARCHES program address diversity at the programmatic level. The DRC serves students with a variety of disabilities from low income, first generation and culturally diverse backgrounds; and provides accommodations based upon functional limitations. Students meet with a DRC counselor to assess their specific needs, cultural impacts, and to encourage interactions with other students on campus. Following this meeting students are asked to complete a satisfaction survey that addresses the cultural sensitivity of the disability services counselor, among other factors.

To promote diversity, ARCHES offers students' awareness and advocacy training, social and cultural events where they can meet other ARCHES students. The DRC begins the process of equity for all students with an invitation for both students and parents to attend a one day orientation program. The program includes a focus on transition issues, self-advocacy, academic readiness skills and parent involvement as well as tours of the DRC and ARCHES offices.

Organizational Structure

- **Leadership**

The DRC has selected, positioned, and empowered program leaders who are qualified on the bases of education, experience, competence, and professional credentials. Each position in DRC meets classification standards established by the CSU system.

The Director provides leadership and oversight for the DRC programs and services, and contributes expertise to university accessibility efforts. The DRC team establishes the overarching department goals and learning outcomes based upon division and university goals, values and learning outcomes. Program leaders lead the staff and day-to-day operations in their respective area, and have the latitude to develop and implement services and learning outcomes in areas to achieve the said goals.

Program leaders are held accountable for their performance in a variety of ways including, but not limited to, regular meetings and performance reviews with the Director; project deadlines and accomplishments; assessments on program goals and learning outcomes; and student feedback and evaluations.

- **Department staffing model**

A staffing model has been developed with the prospect for student enrollment growth projections over the next ten years. A Business Continuity Plan was developed to address the staffing and resource issues that may arise out of an emergency or pandemic situation.

Unfortunately, given the limited resources, there is primarily one person to perform a set of functions in the department. Some individuals have expertise or qualifications that no other person in the department has (for example; learning disability/mental health specialist; assistive technology coordinator). This poses a challenge in terms of cross training and providing services when an individual is absent.

Due to limited resources and budget allocations and the need for an advanced degree to work effectively with students with psychological and cognitive disabilities, it remains that one counselor (a Unit 3 psychologist) works with students with learning, cognitive, attention and psychological disabilities, and one support service specialist works with students with physical and sensory disabilities. This topic is further discussed as part of the Final Recommendations.

- **Organizational reporting structure/management**

The DRC is part of the Division of Student Affairs and reports to the Associate Vice President for Student Services. Each area of accommodation has an individual to oversee its implementation and provide support to students. These areas are:

- Alternate Media Services
- Assistive Technology Support
- Learning Disability and Mental Health Support
- Testing Accommodations and Services
- Physical and Sensory Support
- Communication Services for Deaf and Hard-of-Hearing
- ARCHES TRIO Student Support Services U.S. Department of Education Grant

Protocols exist for documentation standards, registration, and prescription of services and acquisition of accommodations and support services processes for qualified students with disabilities. Each area of service has a specific procedure for the provision of accommodations that outline the responsibilities of the student, DRC staff and faculty to facilitate these accommodations in a timely manner. Procedures are in written and graphic form to assure maximum comprehension by all stakeholders in the accommodation process.

- **Human resources areas**

Staffing: The DRC employs thirteen full-time and approximately five hourly staff; as well as numerous student assistants. Positions are based upon operational needs of the department that are driven by students' functional limitations and the resulting accommodations and support services. Each staff member performs a unique set of functions, so there is little duplication of effort possible. In the event of a reduction in staffing and fiscal resources, the mandated accommodations and services must still be provided by qualified individuals.

- Serves approximately 450 students with a variety of disabilities, providing resources and consultative services for approximately 650 faculty/staff and 22 departments regarding disability and accessibility related topics
- Creates awareness, provides education, and consults on a complex set of federal, state, Office of Civil Rights, CSU and university regulations related to access and equity
- Verifies documentation and prescribes academic accommodations and support services

Challenges:

- Increase in the number/scope of students with learning disabilities, mental health and autism spectrum needs, and newly diagnosed veterans with functional limitations who need new types of disability-related programs and learning supports
- Provide timely and appropriate accommodations/services for evolving learning initiatives in times of limited fiscal resources
- Provide effective accommodations/support services for students with disabilities for evolving on-line learning initiatives across colleges

Hiring: Applications are reviewed to insure that minimum qualifications for the position are met in order to be forwarded to the applicant review process. Applicants are assessed for knowledge, skills and abilities. Once hired, quality service to students, data results, and assessment results are combined to create a holistic assessment of work performance. Student assistants go through an application and interview process to be hired for a position. A program coordinator for an area leads the student assistants in the area they are assigned.

Training: Areas within the department have documented procedural manuals that employees use to guide their understanding of processes and perform work. Work specific training is provided to employees when they begin a new position. Department staff participates in annual professional development/team building activities such as Strengths Finder. Information and training (such as ADA Amendments and Inspiration program) is also

provided during monthly staff meetings. The staff is encouraged to attend university-provided webinars, workshops and trainings throughout the year. A professional development matrix is developed to track all staff training. Staff is also encouraged to attend more university programs and events, especially related to the diversity of students at Cal Poly Pomona. Student assistants are trained “on the job.” due to both the nature of operations and budget constraints.

- **Campus & external relations:**

Relationship with the College Community

The DRC must maintain effective relations with many stakeholders on campus for the overall success of the program as well as in individual program areas. The review team had the opportunity to meet individuals from many of these groups to discuss the relationships and collaboration with their programs or departments.

In general DRC staff maintains an effective relationship with all Cal Poly Pomona Student Service and Instructional Programs and Staff. An indicator is the consistent communication with other programs and staff, participation of DRC staff on campus-wide committees and initiatives; and collaboration efforts with various programs such as Testing Services, The Library and the Assistive Technology Initiative.

The DRC Director, Catherine Schmitt Whitaker, is highly regarded by her supervisors, peers and other campus leadership representatives. **The DRC is seen as having a high level of professionalism.**

Leadership Team for Division of Student Affairs

The review team met separately with Dr. Doug Freer, Vice President of Student Affairs, and with Dr. Kevin Colaner, Associate Vice President of Student Services, to whom DRC reports directly, and later with the group of remaining leaders of the Student Affairs. Regular meetings are held with DRC adequately represented in all areas. **There was a prevailing sentiment that sometimes the DRC staff bears a disproportionate responsibility to meet legal requirements for the campus, even though EO 926 specifically addresses the need for overall campus responsibility to create and sustain access.** Leaders expressed concern over the sustainability of DRC program should the Director not be available for any length of time.

Students receiving DRC Services

The review team met with several students served by the DRC. Both students that had received services through an Individual Education Plan in the K-12 setting, and those that

obtained a diagnosis of disability during their college years were present at the meeting. Students appreciated the timely response by DRC to their needs, as well as the support that collaboration and orientations provided. They recommended more outreach by the DRC to the campus student community to increase visibility and access to students not familiar with the DRC.

Prospective Student Services

There is excellent communication between the DRC and Admissions, specifically in the admission/ special admissions process. A very good flow of activity is done to fully consider the student before denials of admission are processed. Many groups use sign language interpreters for orientations, special meetings, campus tours, etc. They feel that sometimes it would be helpful to know a student's disability, but understand about confidentiality issues. The DRC Director is actively involved in site visits, resources and in special cases when staff members need to fully understand ADA issues. Several examples were provided about collaborative efforts made by both teams.

Student Involvement

DRC has a high level of collaboration with all related programs and services. For example, Student Life works closely with the DRC to consider accessibility issues. The Testing Center has a liaison to the DRC. Career Services host's off-site workshops and work with employers to hire staff with disabilities. Student Support Services shares resources with the DRC during campus events, in addition to informal cross training.

Student Referrals & Services

The review team met the director and a counselor from Counseling & Psychological Services. An effective referral system and collaboration effort is in place with the DRC. The lack of funding for ADD/ADHD or LD assessment creates problems for students who need services but cannot meet documentation requirements. CAPS personnel identified some staffing challenges, since DRC has limited counseling services.

Academics and Faculty

The review team met two faculty members who agreed that the professionalism of the DRC has been impactful. Collaboration with the DRC is uncomplicated, and when a challenge emerges, the DRC has worked one-on-one with faculty to achieve resolution. With regards to the Blackboard learning management system, the DRC staff indicated that faculty readily permits DRC access to their Blackboard sites.

Campus Accessibility Focus groups

The review team met with Co-Chairs of the Access and Compliance Team (ACT)/EO 926 Committee. The committee has been in place for two years and is seeking to develop a statement of purpose to assist with fund development. The group identified issues related to the DRC and students with disabilities. Attempts to review campus efforts for accessibility in the face of limited resources have presented challenges. With regard to facility construction or renovation, the committee has no ability to review plans before the “punch list,” which may result in accessibility challenges. The Committee has a great relationship with DRC Director, who is very articulate, very respected, and is sought after to be on committees.

Accessible Technology Initiative (ATI)

The review team met with some of the ATI Steering Committee members including the ATI Chair. Each representative described ATI efforts, which were very effective and indicative of a clear understanding of accessibility of instructional materials from the IT perspective. There is a clear communication of accessibility requirements within the related information technology departments. Student Affairs IT services does not appear to have a major role in collaborating with the ATI Steering Committee. Nevertheless, ATI accessibility requirements span the entire campus.

Academic Affairs Group

The review team met with key leaders from Academic Affairs and Library Services. Testing services is a high discussion topic in academics. A strong collaborative effort is made with the DRC to manage these various testing options and the provision of accommodations. The library has a 24-hour computer lab with accessible workstations and software. They identified the DRC team as accessible and cooperative. The group also stated that 40% of courses utilize Blackboard, which is accessible for students.

Student Affairs Information Systems (SAITS)

The review team met with SAIT leaders for a clarification of the role and services of the SAIT and its relationships to the DRC. SAIT provides hardware and staff support. One SAIT staff is assigned to DRC as a liaison. The SAIT explained their concerns when reviewing proposed software acquisitions. Their review must take into consideration the need for maintenance and overall compatibility with existing IT on campus, in an environment with very limited SAIT human resources.

The DRC’s outdated FileMaker database cannot be supported or upgraded, since the staff member who designed the database no longer works on campus. In addition, the ARCHES

program must file an annual performance report with the federal Department of Education. Since the federal agency requires the reporting of extremely sensitive information, such as Social Security numbers, a secure database, tailored to the performance report data fields, is necessary. There are several options available for DRC data management and for ARCHES reporting and the review team briefly discussed software with which they have had experience.

AdA Affinity Group

The review team met with members of the AdA, a university-wide affinity organization on campus that is comprised of students, faculty, and staff whose goal is to promote awareness, sensitivity, and a cultural identity of those with disabilities and their allies. The organization holds an annual campus-wide disability awareness event to educate the campus community and promote awareness.

The DRC program has also established, maintained, and promoted effective relations with relevant external individuals and agencies.

- **Implications of staffing cuts:**

With a single person assigned to each service area of the DRC and each role being so unique in responsibilities, it creates a challenge in terms of cross training and providing services when an individual is absent.

Staff has been cut from the DRC but number of students served and resources needed due to growing technology continues to increase.

Resources:

- **Financial Management:**

The funding strategy for the DRC takes into consideration both financial aspects of the budget as well as factors such as timeliness and technology upgrades that can create cost-effectiveness. Annual budget projections are made for each area of accommodation based on the average cost of accommodation for a “typical” student per course. These projections are then extended to the number of students enrolled during a quarter; these figures are then used in metrics for each individual program for the upcoming year. The department also takes into account the legally prescribed accommodation guidelines and what factors can save time and resources. The department also works with other departments within the

division to assist with staffing needs and resources. Budget recommendations are provided as part of Final Recommendations.

- **Facilities**

The DRC is located on the first floor of the Engineering Building - 9, the most-used building for classrooms on campus, and is accessible to all students. The Center includes a reception area and private offices for staff to assure confidentiality. The Center also includes an assistive technology lab with thirteen computers with various assistive technology software. In addition, there are private testing rooms available for use with or without computers, and a conference room that is used for staff meetings, training purposes, and student events when not in use for test administration. The move of DRC to Building 9 five years ago has increased the communication and interaction with engineering faculty who have offices in building 9 and 17 (next door). Additionally; the building is positioned in the center of other academic buildings on campus.

While there are accessible parking spaces and an accessible path of travel to DRC, the challenge is that the accessible parking and path of travel is via the second floor entrance to building 9 and signage is lacking to navigate to DRC.

- **Technology and Equipment**

A process is in place for the technology and equipment in the DRC to be inventoried and maintained on a regular basis to ensure access to students and staff. DRC technology is on a five year rotation plan with the other departments in the Division of student affairs. The computers, software applications (Windows 7, Office 2010, Kurzweil 12, and Adobe X) and scanners in the alternate media area were upgraded in June 2011, increasing efficiency and reducing productivity problems. The DRC also has other assistive and adaptive technology to meet their current needs for these services.

The DRC operation system and network operations were reviewed. Licenses are managed effectively to provide adequate assistive technology services for students. Staff computers are on the SAN, Division of Student Affairs, and network. Software upgrades and patches are pushed out to computers on a regular basis.

DRC and SAITS limited resources (human and financial) hinder DRC's ability to use technology to the fullest extent possible. Further details can be found as part of the Final Recommendations. Money was allocated from the division for a full alternate media transition (Kurzweil 12, Windows 7, Office 2010, scanners, etc.). The transition process was implemented during the summer of 2011.

ARCHES have a separate location and are funded by a federal grant, not the DRC. A predominantly manual tracking system for student demographics, use of ARCHES services, financial aid, and retention and graduation data is utilized. This operation is made even more onerous because of the federal requirement to track cohorts of participants beyond their active status in the program. There is limited student data available from the campus data warehouse, no access to PeopleSoft student data and little prioritizing by the campus to provide a data file with essential information arrayed in a usable format.

Laptops are available to be checked out quarterly for student use. The laptops are fully loaded with standard and assistive software, but the laptops are not supported by SAIT because they were a direct purchase using ARCHES federal funding. Furthermore, funds earmarked in the Student Support Services grant proposal and budget for tracking software have not been spent due to concerns about who will be responsible for installing, maintaining and upgrading the software. Generally, universities receiving these types of grants are expected to provide some level of support as part of the institutional commitment to the success of the grants and grant participants. Conversations to clarify roles and responsibilities would be helpful in resolving this circular issue.

Assessment & Evaluation

- **Level of a culture of evidence**

Our review revealed a high level of focus in the area of assessment of all aspects of the DRC program. In spite of the lack of an efficient data tracking software system, the staff manually and carefully tracks and completes follow-up reviews of services provided, as well as volume and resources needed to effectively provide services.

- **Student Learning Outcomes**

Annually, DRC produces a report highlighting accomplishments, committee work, funding development and student learning outcomes. Student satisfaction with counselors and other topic-specific surveys are conducted routinely to gain feedback and input from students.

Due to the lack of a functional database to facilitate, track and monitor DRC services, it is difficult to produce meaningful and timely data and reports. Thus, it is a challenge to efficiently and effectively manage and report on student retention and graduation rates, and utilization of DRC programs and services.

- **Legal compliance and ethical standards**

Legal Compliance:

The two crucial legal issues faced by the DRC are providing reasonable accommodations in a timely manner to students, and the confidentiality of student records and information. The programs provided to students through the Center are similar to those that guide the ethical standards of the office and the greater university.

Information contained in students' education records are never disclosed without written consent, except as allowed by law and institutional policy. The DRC has both intake and release forms to support this policy.

DRC staff members are trained and instructed on legal issues and have access to several resources that can be of assistance when addressing legal concerns.

A formal grievance process is in place and Grievance Guidelines are posted on the DRC website at <http://www.dsa.csupomona.edu/drc/grievance.asp>.

Ethical Standards:

The ethical principles and standards that guide the Disability Resource Center and its staff include the mission and vision of the university and the DRC, FERPA, Human Resources policies, University Risk Management policies, and The California State University Executive Orders and Coded Memoranda. These standards include but are not limited to access to student and employee records and information, use of technology, confidentiality, and research practices. The DRC has a procedure to follow if students or staff has ethical concerns. DRC staff follows professional codes of ethics according to their professions: NAD-RID Code of Professional Conduct for sign language interpreters; National Court Reporting Association Code of Professional Ethics for captioners; and Ethical code of conduct for counselors (Board of Behavioral Sciences); APA Ethical Principles of Psychologists and Code of Conduct for psychologists.

- **CSU system compliance audits**

All new employees in the Disability Resource Center, and the greater university, participate in a new hire orientation and training that includes policies and guidelines that must be followed as a staff member.

University-Wide Review

The review team carefully evaluated the accessibility website and the campus commitment to this effort, *"It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff and the general public regardless of disability."*

- **Physical Accessibility:**

The review of the physical accessibility of the campus was focused on the brief time spent on site and the resources available through the DRC to provide physical access to the campus.

The terrain of the campus creates challenges for students with mobility related disabilities, especially with the time between classes being an average of ten minutes. The DRC has one accessible golf cart available for assistance with transportation services. **The availability for this service is limited by both staff available to transport and the number of students needing service at any given time.**

- **Virtual Accessibility:**

Statement from the accessibility website clearly describes the commitment we observed from the university *"The Internet and resources such as web sites, web applications, and digital content are some of the primary vehicles by which information reaches the Cal Poly Community. The central presence of the World Wide Web in delivering information and providing services is an essential reason to make its accessibility a priority for the university"*.

Open labs do not have consistent accessible work stations and software applications.

- **Compliance with EO 926**

The EO 926 is the California State University's (CSU) Policy on Disability Support and Accommodations. See the program evaluation matrix Appendix "B" for details.

- **Compliance with Accessible Technology Initiative (ATI)**

The ATI campus committee provides committed leadership to the campus. The review team had the opportunity to meet with committee members and it is clear that the campus has made a significant investment in resources to lead the way in "Access to Technology." The ATI website provides information and resources which can help in providing accessible content and/or services. <http://www.csupomona.edu/~accessibility/index.shtml>. There are some concerns about the implementation of the ATI in Student Affairs, which is addressed in the final recommendations.

In spite of upgraded technology in DRC to effectively manage the alternate media process for students, challenges remain due to instructors not getting requests into the bookstore in a timely manner. In August 2008, the Higher Education Opportunities Act (HEOA) was signed into federal law, requiring campuses to disclose, on the institution's internet course schedule, the required and recommended college textbooks and supplemental materials for each course. This allows the DRC to have materials ready in a timely manner. Unfortunately the DRC reports that supplementary course materials for many courses are not shared with students until after the first day of class.

Division's Strategic Plan in line with the CAS Standards for Disability Support Services

It is clear that CAS Standards can be identified within the division's strategic plan. A few questions exist, however, about the current status as they relate to the DRC based on the timeline indicated as part of the original plan.

1. Build Bronco Pride through a vibrant campus community.

B. Enhance student services and service utilization. (According to the timeline these items should be well underway towards completion and no evidence was found, recommending review of status.)

- **Develop the self-determination and self advocacy of students with disabilities** by increasing education and awareness of the importance of their involvement within the Disability Resource Center and campus life.
- Develop a plan, in coordination with the University Transition Plan to identify, renovate and create **accessible parking spaces and paths of travel.**
- Partner with key campus constituents to create a portfolio of services responsive to the unique **needs of veterans.**
- Explore the feasibility of providing additional **twilight and weekend services** offered by multiple offices.

9. Deploy technology to achieve outcome based improvements. (The DRC experiences technical challenges and limited access to IT resources).

- Continue to develop and implement desktop and other technology standards to ensure compatibility, functionality, protection of user data and efficient technical support in an environment of 99.999% reliability and survivability.

- Improve communication, encourage engagement, build community and increase efficiencies through expansion of the portfolio of online processes and services.
- Leverage the utilization of untapped PeopleSoft functionality
- Establish a Technology Implementation Committee to prioritize new technology requests and support deliberate and sustainable technology growth

University Divisional Values and Initiatives

The DRC Alignment with the University Divisional Values and Initiatives and the value they bring to the University.

Student Affairs Divisional Values are articulated in the division’s Strategic Plan. DRC staff exhibit a commitment to the Student-Centered Philosophy in their response both to the individualized needs of students with disabilities and in their understanding of the program’s place in the overall divisional structure. The DRC is placed in an organizational configuration with other service-oriented units closely allied with the DRC mission, although serving different student populations. The Interconnectedness of these missions in support of service to the whole student is generally understood, and is accomplished in a cooperative and cordial atmosphere. The respect that many university stakeholders hold for the DRC and particularly its Director, is tied closely to their perception of the Quality of direct services to students with disabilities as well as consultation and collaboration with university faculty and staff in other areas. The mission of the DRC also speaks to the Richness of Diversity value in their active support of and advocacy for students with disabilities. Frequently, disability is forgotten in the discussion of diversity, but the DRC has sponsored campus-wide events with nationally recognized speakers to educate the campus and enhance the campus climate for individuals with disabilities.

Within the Initiatives Section of the Strategic Plan, there are elements that affirm DRC alignment with the Plan, and also areas where DRC concerns were not obvious.

- 1. A. **Expand and improve campus facilities – there is no mention of cramped quarters for ARCHES, or the relatively small test accommodation facilities in the DRC.**
- 1.B. **Enhance student services and service utilization –**
 - **Self-determination and self-advocacy for students with disabilities is a worthy initiative with the potential to be compromised when scarce resources must primarily be focused on legal compliance.** The AdA, however, plays a major role in supporting this initiative.

- Plan to renovate and create accessible parking spaces and paths of travel – identification of this mutual goal of the DRC and the division is heartening, but also challenging, considering the topography of the campus. On the other hand, the campus does have large areas of open space which may afford the ability to identify additional accessible parking spaces and paths of travel.
 - Additional twilight and weekend services – test accommodations in particular pose a problem when tests are rescheduled at times other than when a class is taking the test. It has the potential to deny access to an accommodation for a night student who works during the day, for instance, or to deny the distraction-reduced environment that is available during normal working hours. The division recognizes this challenge for multiple offices, but DRC services not offered while classes are in session carry the most inherent risk to the university.
- 1.C. Instill a sense of pride and community – while sorely needed by students with disabilities, there is no specific mention of them as an underrepresented group in need of recognition and understanding in the division initiatives. The DRC does understand, however, the importance of inclusivity of these students in campus life and activities.
 - 2. Advance the culture of learning, assessment and continuous improvement – this program review is an example of embracing the divisional initiative to conduct regular program reviews within Student Affairs. The DRC is sincerely aligned with this goal, as demonstrated by numerous methods of assessing program effectiveness.
 - 3. Enhance internal and external communication – there is acknowledgement of accessibility needs when designing on-line outreach to parents and families of new students as well as the students themselves. While not a core DRC responsibility, the division has been educated to the need for accessibility.
 - 4. Preserve the environment for future generations – in enhancing and implementing alternative transportation, the DRC plays a role by providing golf cart service, thus making it less necessary for some students to rely on moving their cars multiple times during the course of the day in order to get closer to their classroom buildings.
 - 5. Align student body profile to be reflective of the institution’s Core Values and the Academic Master Plan – the DRC and Student Support and Equity Programs are natural partners, a fact that is acknowledged in the Initiatives.
 - 6. Advance programs and services that foster strong persistence, graduation rates and efficient time to degree – if provided with improved tracking software, ARCHES will be poised to provide metrics on retention and graduation rates of a cohort of students with disabilities receiving enhanced services.

- 9; Deploy technology to achieve outcome based improvements – the use of technology can both create and eliminate barriers to education for students with disabilities. The DRC is a diligent partner in reminding the larger community of the need to sustain accessibility as more technology solutions are deployed.

Impact Evaluation & Recommendations: Information is included in the Final Dissemination.

FINAL RECOMMENDATIONS

DRC Program Review:

Some of challenges and recommendations that came from DRC staff:

- To be certain to provide accommodations in a timely manner timely communications with the faculty is required. Faculty information is not included on class registration information, delaying the ability for DRC to begin work.
- Faculty does not seem to be aware of the need for priority registration for DRC students. Individual departments on campus are allowed to set-up holds on registration for various reasons, this delays DRC student's ability to get access while DRC staff work to resolve what is often a simple issue that was not communicated to the student.
- Students recommended more outreach by DRC to the campus student community to increase the visibility of the program and to encourage early identification of students with disabilities.

There are also a number of areas where we feel DRC could benefit by discussing potential modifications to current operations:

- As noted earlier, the DRC has been designated as the campus authority to prescribe specific accommodations for students with documented disabilities. The DRC receives funding for these mandated academic accommodations. However, the DRC has been providing accommodations in two areas that it may be more appropriate to have another campus entity provide.
 - Classroom furniture for students with disabilities (chairs and tables). It would make sense for accessible and adjustable furniture to be included as a standard component of classroom furniture configurations in the future, rather than relying on the DRC to place, track and retain the furniture.

- The DRC is providing accommodations (including sign language interpreting and real time captioning) for clubs and organizations. Currently, the student with a disability requests the accommodation through the DRC, because that is the process the student knows; club leaders are not forewarned about the potential need to accommodate club members, and often the clubs fundraise with outside donors to support activities that do not take into consideration the possibility that disability accommodations will need to be provided. The review team recommends that a clear protocol be articulated for arranging accommodations for club and organization activities, and that additional financial resources be identified to provide these non-classroom-related activities. Perhaps a reserve fund established by Associated Students, Inc. would meet this need.
- Similarly, departments across the campus need to provide accommodations for students, faculty, staff and community members. For example, creating accessible documents and web sites, assisting with a scribe/reader to complete a form and other types of accommodations.
- The DRC has one accessible golf cart available for assistance with transportation services for students on a campus with terrain challenges. As with many other campuses, parking is concentrated at the periphery of the campus, with fewer parking options in the campus core. We recommend the purchase of an additional golf cart so that there is a back-up plan if one cart fails, and so that two carts can be deployed during peak periods of use. The campus should also discuss resources for providing golf cart service to staff and faculty, as typically DRC is requested to transport them without benefit of funding.
- Campuses are seeing more returning students, as economic and employment factors worsen. Adult learners are increasing and often come with limited basic computer skills along with little knowledge of assistive technology. The California Department of Rehabilitation is referring clients back to school so the DRC serves many of these students. There appear to be limited resources on campus to help with these basic skills. In an era of scarce resources, perhaps a volunteer student-to-student program could be organized to assist re-entry students with disabilities in gaining needed computer skills.

Organizational Structure

- The Director of the DRC is personally involved in all aspects of campus collaboration with the DRC. A concern was raised over the sustainability of the DRC program should the Director not be available for any length of time. There is no succession plan in place, and the Director is the sole Management Personnel Plan employee within the program. Formulation of a sustainability plan that eventually includes the addition of a second MPP staff member would provide increased opportunities for outreach to the campus and community along with

increased ability to support and coach the DRC staff. It might also make possible the provision of extended hours for test accommodations and cart service.

- The review team was asked to consider the placement of the Unit 3 Psychologist/LD Specialist within the DRC rather than in Counseling and Psychological Services. While placement in CAPS would provide more collegiality, such an arrangement might be construed as contradictory to CSU policy, articulated in Coded Memorandum AA-2009-27: *“The campus director or designee of the program for services to students with disabilities shall have the ultimate authority to determine disability status, and the decision shall be subject to the provisions below and to established appeal procedure.”* Across the CSU campuses, most DRC programs have a psychologist and/or learning specialist who reviews learning disability, ADHD and mental health documentation for eligibility for services, rather than functioning primarily as a therapist. This configuration serves to define the functions and missions of DRC and CAPS programs, and prioritizes the provision of disability accommodations and services within the DRC function.

Recommendations:

- During the review there was significant response about the requirements for the Unit 3 psychologist role, which clearly requires further discussion for applicable procedures.
 - In spite of the assignments for psychologists in different locations, a strong communication process is in place between centers, which allows for effective provision of services for students. However, they feel that while she does an excellent job, the workload with Dr. Ang is overloaded. She is often unavailable for consultation. Additional support is required which may be in the role of Learning Specialist for initial LD assessment efforts.
- Student Assistant training is conducted 'on the job' due to both the nature of our operations and budget constraints. It is recommended that simple yet specific training outlines be developed to ensure consistency and to effectively communicate the issues related to working with students with disabilities.

Resources

The DRC base budget allocated at the start of an academic year does not cover the projected mandated accommodation and service delivery needs for the year, thus resulting in a deficit at the end of the academic year. There is no university level reserve to cover the deficit, which then falls to the cluster level as part of a division practice.

The major funding challenges are in the areas of 1) providing real time captioning and sign language interpreting services for students who are deaf/hard-of-hearing; 2) timely provision of alternate media for students who have a print-related disability; 3) delivery of testing accommodations for students with disabilities in a timely manner, and 4) golf cart service for students who have a mobility-related disability. Factors outside the control of DRC that contribute to DRC's increased financial and human resource needs include; course offering times, students' selection of courses, limited identification of course materials by university textbook deadline, announcement first day of class to purchase course material off campus, tests not delivered in a timely manner to DRC for test accommodation administration.

Budget recommendations are divided into the five required categories (human resource needs, facilities needs, technology needs, access and equity, and professional development needs) which have been specifically linked to the program review goals/objectives.

Human resource needs

- Often, other areas will contact DRC to request DRC's financial assistance to meet their departments' accommodation for a student; however, DRC is not currently funded to provide this type of accommodation.
- With one counselor (Unit 3 psychologist) available to work with students with learning, cognitive, attention and psychological disabilities and one support service specialist to work with students with physical and sensory disabilities, it becomes necessary to review what duties of this position might be reassigned to another staff member without requiring that staff member to be working out of classification.

Facilities needs

- The ARCHES program is located in Building 1. The space is heavily utilized and, when several students are receiving tutoring services simultaneously, physical accessibility within the space is severely compromised. Tutoring in an open lab space also creates challenges for students with ADHD or auditory processing disorders. Ironically, Room 214 next door is empty and could be used as an overflow space for tutoring without retrofitting the room.
- Modified signage is needed at building 9 to direct students to DRC services. The accessible parking and path of travel is via the second floor entrance to building 9, and signage is lacking to navigate to DRC.

Technology needs

- Database system Recommended: Due to the lack of a functional database to facilitate, track and monitor DRC services that would produce meaningful and timely data and reports, the

DRC is challenged efficiently and effectively to manage and report on student retention and graduation rates, and utilization of DRC programs and services. The DRC has used a Filemaker database system for many years that was developed by a prior staff member. Although originally a functional database, documentation does not exist so the ability to support the software currently is non-existent. A new database system is needed that can be maintained within the DRC program with minimal support necessary from SAIT staff. We recommend exploration of available programs compared to in-house development. There are pros and cons to each approach, but in the face of very limited staff in SAIT, serious consideration should be given to stand-alone programs for both the DRC and ARCHES components.

- Also, there is a desire to use emerging technologies, such as iPods and virtual folders to deliver alternate media, yet there is an effort to standardize technologies and applications within the division due to limited resources. Additionally, the purchase of new computers to provide new services, such as a kiosk for student use in the reception area, is not supported.

Access and equity

- **Direct IT access recommended for DRC:** The DRC Assistive Technology lab appears to be limited in their access to effectively manage the multiple technical aspects of their services in spite of having staff with the technical skills available to do so. The current Division IT structure (SAIT) requires that all requests are made to and serviced directly by the SAIT department. There is no dedicated IT support for the DRC cluster of computer operations. With the limited resources described by the SAIT staff, the DRC must wait for services and it limits the ability for the DRC to provide a timely response to students' technology needs. No one in the DRC has full access rights to support their large network and modify their existing database. DRC technology needs differ from regular SAIT users, and it would be worthwhile to consider alternatives that would still acknowledge security and other guidelines as well as budget constraints set forth by Student Affairs, but also give access to the DRC to keep the campus in compliance with legal mandates.

Professional development needs

- Training has seen a significant hit with the recent budget restrictions, which have also significantly eliminated the networking across the CSU for members of different service groups. The DRC feels this weight, as do others, by the inability to participate in statewide training and networking at conferences and similar opportunities. It is critical that the DRC be able to manage changing needs related to Section 504, Section 508, and the ADA Amendments as well as the increasing populations of students on our campus in specific disability groups. Conferences, such as the annual California Association of Postsecondary

Education and Disability convention, the CSUN Disability and Technology conference, as well as more technical options for relevant staff, become a critical avenue of professional development for the DRC staff.

University-wide:

- The Blackboard learning management system is working well, and the DRC has had a good experience with faculty giving them access to Blackboard. It is recommended, however, that a more effective timeline conversion be identified for tests on Blackboard.
- To fully comply with the HEOA, the campus needs to ensure that not only required textbooks but supplemental course materials are identified and made available at the time of registration to allow time for alternate format production as needed for compliance. This is especially important for a university on the quarter system, where the lead time is already severely constricted.
- Regarding lack of fully accessible resources in open labs on campus, we recommend a full evaluation of accessible workstations and software applications on all open labs on campus. Identify required improvements and build a plan for implementation.
- As part of the facilities project planning process, it would be advisable for an accessibility review by the ACT to be considered. This is not intended to certify ADA compliance, but to provide input and guidance regarding usability by individuals with disabilities, before project plans are finalized.
- As part of the University Transition Plan to identify, renovate and create accessible parking spaces and paths of travel, also consider expanding campus transportation services.
- The University is clearly a leader in implementing the Assistive Technology Initiative in all areas other than Student Affairs, which seems to follow a common misunderstanding among campus communities. However, the ATI is for all technical aspects of providing services and support on our campuses. **A review of the implementation of the ATI at the Student Affairs level is recommended.**

ADA/EO 926 Compliance Issues

- **The Access and Compliance Team (ACT) recommends that in order to update their understanding of the needs of students with disabilities, the DRC Director could be asked to**

discuss DRC issues more frequently, especially with Student Affairs staff and with faculty members.

- There are limited resources on campus for ADA Compliance review. All discrimination claims come through one staff member with no administrative support for timely processing.
- Faculty may not have good understanding of 1045. It is not clear that faculty know what to do when faculty discriminate. There does not have a written policy of application for whom to go to for resolution for claims of discrimination.

APPENDIX A

Cal Poly Pomona Disability Resource Center (DRC) Campus Access Program Review Agenda April 2-3, 2012

Monday, April 2, 2012	
8:00 am	Meet Dr. Cathy Schmitt Whitaker <u>Location:</u> CLA Building 98
8:15 – 8:45 am	Disability Resource Center Program Review Overview and Tour Dr. Cathy Schmitt Whitaker, Director, Disability Resource Center <u>Location:</u> DRC (9-103)
8:45 – 9:45 am	Meet with DRC Staff <u>Location:</u> DRC (9-103)
9:50 – 10:15 am	ARCHES Overview, Tour and Staff Introductions <u>Location:</u> ARCHES Bldg. 1
10:30 – 11:15 am	Meet with Associate Vice President, Student Services (DRC direct report) Dr. Kevin Colaner <u>Location:</u> 98-T5-5
11:15 am – 12:00 pm	Meet with Vice President for Student Affairs Dr. Doug Freer <u>Location:</u> 98-T6
12:00 – 1:00 pm	Lunch with DRC Students: Ms. Adriana Kraig, Ms. Christine Pasco, Mr. Jim Khoa Lam, Ms. Vanessa Mendoza <u>Location:</u> 98-T5-5
1:15 – 2:00 pm	Perspective Students Theme <u>Location:</u> 98-T5-5 Ms. DeBorah Brandon, Executive Director, Admissions and Outreach Dr. Megan Stang, Director, University Housing Services Ms. Norma Leon, Senior Coordinator, Orientation Services
2:00 – 2:45 pm	Student Involvement Theme <u>Location:</u> 98-T5-5 Mr. Tom Munnerlyn, Director, Career Center Ms. Lea Manske, Associate Director, Student Support & Equity Programs Ms. Jenni Adams, Interim Senior Coordinator, Office of Student Life
2:45 – 3:15 pm	Student Referrals & Services <u>Location:</u> 98-T5-5 Dr. Michele Willingham, Director, Counseling & Psychological Services Representative, Student Health Services
3:15 – 3:30 pm	Break
3:30 – 4:15 pm	Meet with Faculty <u>Location:</u> 98-T5-5 Dr. Liliane Fucaloro, Chair, Professor-English & Foreign Languages Dr. Jennifer Switkes, Professor-Mathematics & Statistics Dr. Suketu Bhavsar, Director, Kellogg Honors College, Professor-Physics

4:15 – 5:30 pm	Campus Tour Poly Pathfinder Tour Guide
6:00 pm	Dinner Host: Dr. Cathy Schmitt Whitaker, DRC Director

Tuesday April 3, 2012

8:00 – 9:00 am	Breakfast/Overview of Campus Accessibility Dr. Kevin Colaner and Ms. Carmen Munoz-Silva, Co-Chairs, Access and Compliance Team (ACT)/EO 926 Committee
9:15 – 10:00 am	Access and Compliance Team (ACT) Members <u>Location:</u> 98-T5-5
10:00 – 10:45 am	Accessible Technology Initiative Steering Committee <u>Location:</u> 98-T5-5
10:45 – 11:30 am	Meet with Academic Affairs <u>Location:</u> 98-T5-5 Dr. Claudia Pinter-Lucke, AVP, Academic Affairs (maybe a few minutes late) Dr. Shanti Srinivas, AVP, Faculty Affairs (tentative)
11:30 am – 12:00 pm	Review team confer
12:00 – 1:00 pm	Lunch with Division of Student Affairs AVPs Ms. Christi Chisler, AVP, Student Affairs Administration Dr. Rebecca Gutierrez Keeton, AVP & Dean of Students Ms. Kathy Street, Associate, Enrollment Services
1:15 – 1:45 pm	Meet with SAITS DRC Conference Room (9-103) Mr. Kevin Morningstar, Executive Director Ms. Cathy Bates, Director
1:45 – 2:15 pm	Meet with AdA Affinity Group DRC Conference Room (9-103)
2:30 – 3:00 pm	Exit Meeting with Reviewers: DRC staff, Dr. Kevin Colaner

APPENDIX B

Executive Order 926

THE CALIFORNIA STATE UNIVERSITY: Office of the Chancellor

Title: The California State University Policy on Disability Support and Accommodations

Effective Date: January 1, 2005

Purpose	CSU Cal Poly - Pomona: DRC Program Review
<i>Procedures for compliance with this executive order, applicable federal and state laws, and CSU policies are the responsibility of the president and his or her designee.</i>	
Each campus shall develop and maintain overall procedures for ensuring compliance with applicable federal and state laws and regulations, as well as local written policies for accepting, investigating and resolving any student, faculty, staff and public complaints it may receive.	Policy and procedures are in place as required.
Each campus will work with its campus Americans with Disabilities (ADA) Compliance officer/coordinator and establish a standing committee described under Section V to monitor the elements of this executive order.	The standing committee known as the Access and Compliance Team (ACT) has been in place for 2 years. Academics has there own committee to address issues. Only one individual receives claims of discrimination for the rest of campus with no support. Unclear what collaboration efforts are made between two groups to ensure consistency.
POLICY STATEMENT	
<i>The policy of the CSU is to make its programs, services, and activities accessible to students, faculty, staff, and the general public who visit or attend a campus-sponsored event, with disabilities.</i>	
Academic Affairs	
<i>The division of Academic Affairs, Student Academic Support is responsible for student access to academic programs, services, and activities and system wide student program evaluation.</i>	
Academic programs, services, and activities are those related to the curricular, co-curricular, or extra-curricular activities for students, faculty, staff, and general public participating in campus functions.	The Campus and DRC have a strong level if interaction and collaboration is seeking accessibility in providing activities on campus. However this is based on the collaboration efforts and was not seen as required evaluation of those same activities.
The delivery of electronic texts (e-texts of instructional materials) to eligible CSU students with disabilities.	While instructional materials have a implemented a strong program and policy implementation under the ATI, Student Affairs and other campus entities do have not implemented it at the same level. (ATI)
Campuses will also be subject to compliance with new guidelines addressing technology accessibility for students, faculty, and staff.	Did not have access to any formal policy to review, so findings based on personal reviews with staff and faculty: Not seen as equally applicable at the staff level.

Student services are those activities and programs that help students succeed at their educational experience at a CSU campus. Student service programs shall be made available so that all students, including students with disabilities, have the opportunity to participate.	Strong level of collaboration with DRC by most campus areas in an effort to provide accessibility for students.
<i>Business and Finance</i>	
<i>The division of Business and Finance addresses the areas of business function and financial transactions for the university including the procurement of goods and services, capital planning, design and construction, information technology services, and parking facilities.</i>	
<i>Procurement of Goods and Services</i>	
Any public solicitation process developed by campuses shall be compliant with all applicable regulations and guidelines issued pursuant to the ADA and California Government Code § 11135 so as not to deny persons with disabilities the opportunity to participate in the competition for the contract award.	Did not confirm
When acquiring information technology, each campus shall acquire products that comply with applicable Section 508 provisions when such products are available in the commercial marketplace.	Strong procurement measures to assure accessibility are in place.
Contracts for the acquisition of information technology products shall include the statement in CSU General Provisions for Information Technology Acquisitions, clause 27, ADA.	Did not confirm
<i>Information Resources and Technologies</i>	
<i>Information Resources and Technologies refer to all programs and services provided to students, faculty, staff, and the general public through computer or electronic media. This includes, but is not limited to computer and network access and services, computer-delivered or enhanced instruction, library electronic information resources, library online catalogs and homepages, campus informational web sites, computer-delivered or assisted administrative services, and voice and video programs and services.</i>	
It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff and the general public regardless of disability.	Policy indicates this commitment
Section 508 of the 1973 Rehabilitation Act applies to the CSU. Section 508 addresses all aspects of access to information technology, web-based materials, programs and services including guidelines for creating accessible web sites.	Policy indicates this commitment

California Education Code § 67302 requires that, when certain conditions are met, “an individual firm, partnership or corporation that publishes or manufactures printed instructional materials for students attending...California State University...shall provide to the university...any printed material in an electronic format mutually agreed upon by the publisher or manufacturer and the college or campus.”	Did not confirm
The office of Information Technology Services is responsible for oversight of system wide information technology programs and services. Information Technology Services also has oversight of system wide library technology programs.	The Accessible Technology Initiative resides with in the campus IT, but its application does not appears to be reinforced in all information technology areas campus wide.
<i>Physical Access</i>	
As a public entity, CSU is required to ensure that all of its programs are accessible to those with disabilities when viewed in their entirety.	A single cart is made available through the DRC to provide transportation around campus to individuals with disabilities which require this assistance. These limited resources raise concerns. It is unclear what efforts are made for staff and faculty with similar concerns.
Section 35.105. Existing Facilities: A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and useable by individuals with disabilities.	Confirmed to a limited level based on personal review
The CSU campus transition plans 2 should be updated to reflect current campus conditions.	Did not verify
All new construction and renovation work shall be designed to be compliant with Title 24 of the California State Building Code (accessibility standards).	Did not verify
Campuses shall continue to strive for a barrier-free environment, supportive of universal access, through major capital outlay renovation projects and minor capital outlay correction projects. Campus departments responsible for equipping such spaces should also take into consideration program access needs.	DRC Director is encouraged to provide insight as part of the ACT, but often not in a timely manner.
<i>Parking and Transportation</i>	
Campuses that develop and operate transportation systems must ensure that such systems are accessible to persons with disabilities.	Single golf cart provided by the DRC is accessible.

The Chief Administrator/Business Officer for each campus is responsible for establishing and implementing effective controls for the audit of disabled parking. A copy of the current audit should be kept on file at the campus until the new audit is completed.	Did not review
Minimum requirements and standards for disabled persons' parking on campus are as follows:	Did not review
<i>Human Resources</i>	
<i>The Office of Human Resources defines and governs the relationship between the CSU and its employees in the areas of labor relations, employee relations, academic human resources, administration and professional development.</i>	
The CSU is committed to maintaining a work environment free of disability discrimination and to providing reasonable accommodation in compliance with state and federal laws, regulations, and system wide policies.	Did not confirm
Pursuant to Executive Order 883, reasonable accommodation is to be provided upon request from an employee or applicant with disabilities, unless doing so would impose an undue hardship on the campus.	Did not confirm
The internal procedures for investigating and resolving issues concerning disability accommodation have been established for employees.	Did not confirm
It is each campus' responsibility to provide compliance training to its respective campus community.	Did not confirm
MONITORING AND COMPLIANCE	
Each campus shall establish an advisory committee on services to students with disabilities to assist in the evaluation of current campus policies and procedures relating to students with disabilities, develop plans relating to programs and services for students with disabilities, recommend priorities, review barrier removal priorities as specified in State University Administrative Manual (SUAM), and develop timelines as defined in each campus' transition plan.	Met briefly with leadership for the Access and Compliance Team (ACT)- limited understanding of compliance review.

Each campus shall establish a standing committee on Disability Access and Compliance involving the ADA compliance officer/coordinator and representatives from Academic Affairs, Business and Finance, Human Resources, Information Technology, Parking, Procurement, Student Services, one student representative appointed by the Associated Students, Inc., one faculty member appointed by the Academic Senate, and one staff representative.

Met briefly with leadership for the Access and Compliance Team (ACT)- limited understanding of compliance review.

APPENDIX C

Code AA-2009-27 Review

Title: Policy for the Provision of Accommodations and Support Services to Students with Disabilities

Effective Date: December 17, 2009

Purpose	CSU Cal Poly - Pomona: DRC Program Review
Guidelines for the Assessment and Verification of Students with Learning Disabilities	
CSU Definition of a Learning Disability; Qualifications to Diagnose; Assessment and Substantiation of a Learning Disability; Documentation should validate the need for accommodations and support services based on the student's current level of functioning in the educational setting.	Clearly identified on the DRC website. Required and reviewed by qualified professional, Dr. Ang, prior to delivery of services. Guidelines identified in DRC website, http://www.dsa.csupomona.edu/drc/files/DRC_Documentation_Standards_-_LD_8-6-07_3948.pdf
Each CSU campus shall maintain appropriate confidential records that identify students with disabilities. All such records, including student medical records, shall be considered "education records" protected by the Family Educational Rights and Privacy Act of 1974 Page 3 of 9	Policy and procedures indicate this responsibility, but actual files were not evaluated for compliance.
(FERPA) and its regulations.	Policy for DRC staff and provision of services to students is in place to adhere to FERPA regulations.
B. Assessment Process The proper diagnosis of a learning disability involves an orderly, deductive process during which a wide range of information must be considered. Reliance on a single test instrument, no matter how comprehensive it appears, may be misleading.	DRC staff, Psychologist Dr. Ang, is qualified to provide assessment and diagnosis for LD as needed and to verify diagnosis made by other professionals. Includes: Diagnostic Interview, testing process, factors to be measured, test scores, interpretation, diagnosis and summary, recommendations and support services.
Policy for the Provision of Accommodations and Support Services to Students with Disabilities	
Program Coordination; Academic Requirements and Reasonable Accommodations; Communications Technology, Auxiliary Aids, and Services; Services: Auxiliary Aids and Services and Reasonable Accommodations ; Services to Students in Continuing/Extended Education Program; Provision of Services; Appeal Process;	DRC documented procedures are in place to meet these standards. See DRC website http://dsa.csupomona.edu/drc/univadmissions.asp ; Information on website directs viewers to direct location for grievances: http://dsa.csupomona.edu/drc/grievance.asp
Campus Advisory Committee	Access and Compliance Team (ACT)/EO 926 Committee. Committee has been in place for two years.
Enrollment Data and Use of Services:	Did not verify reports.
System wide Program Evaluation	Conducted, May 2012