



California State
Polytechnic University,
Pomona

Final Project Report

*Review: Disability Resource
Center*

June 21, 2016

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Table of Contents

Section	Page
Introduction	3
Findings and Analysis	5
Strategy, Assessment, and Recommendations	34
Appendix: CAS Standards for Disability Resource Services	50

Introduction

Project Description

California State Polytechnic University, Pomona (Cal Poly Pomona; the University) worked with Keeling & Associates, LLC (K&A) to complete a strategic review of its Disability Resource Center (DRC), with a particular emphasis on the alignment of the Center's resources with students' current and projected needs.

Background

In a separate project that did not involve any assessment, analysis, or recommendations regarding DRC, K&A completed a comprehensive review of the University's Student Health and Counseling Services (SHCS) and PolyCARES. That project included extensive interviews and meetings with students, SHCS and Student Affairs staff, and University leadership; a two-day visit to campus on March 1–2, 2016; and a web-based survey of students. The final report was submitted to Cal Poly Pomona on May 3, 2016.

In the midst of concluding that report, the Associate Vice President for Student Services (AVP) and President asked K&A to conduct an independent, strategic review of DRC, in order to (1) help the University determine and articulate a clear vision for the work of DRC; (2) assess the alignment of the Center's current functional and operational capacity and resources, and its relationships and levels of collaboration with other University offices and departments, with the needs of students today and in the future; and (3) make recommendations through which Cal Poly Pomona can improve its preparedness, agility, and effectiveness in responding to both student and institutional needs in the broad area of disabilities.

Core points to be addressed in the review included the following:

- ▶ Formulation of a clear vision for the Center, from which will derive strategy, priorities, and the portfolio of programs and services for the future;
- ▶ A current strategic analysis—strengths, weaknesses, opportunities, and threats;
- ▶ An operational, service, and resource analysis to assess the current functioning and effectiveness of DRC, including the alignment of human and other resources with the current and projected needs of students;

- ▶ An analysis of DRC's alignment with standards and best practices identified by the Council for the Advancement of Standards in Higher Education (CAS); and
- ▶ A mission and outcomes analysis, to determine how DRC supports and responds to the mission and vision of Student Affairs and the University—in particular, how it partners and collaborates with faculty, departments, and programs; contributes to the President's focus on student-centeredness; and supports students' learning, engagement, and achievement of the University's desired student learning outcomes.

Since K&A had already visited campus for the SHCS and PolyCARES review, and since DRC space and facilities are not within the scope of this project, all aspects of the review were conducted remotely.

Project Activities

To accomplish the goals of the project, K&A completed the following activities:

- ▶ **Review of Documents and Data:** K&A obtained, inventoried, reviewed, and analyzed pertinent documents and data regarding DRC, including annual reports, budgets and financial data, organization charts, position descriptions, external reviews, utilization data, student survey data, and other resources.
- ▶ **Telephone Interviews:** K&A conducted remote interviews via telephone with the Interim Vice President for Student Affairs, AVP, Director of DRC, Learning Disability/Mental Health Specialist, and Program Coordinator for ARCHES, between May 2–11, 2016; and a concluding interview with the President on May 27.
- ▶ **Student Group Videoconference:** K&A conducted a remote interview via videoconference with a group of registered DRC students on May 12, 2016, to assess their awareness of, utilization of, and satisfaction with DRC services.
- ▶ **Draft Report:** After completing the data and document review, initial telephone interviews, student group videoconference, and concluding interview with the President, K&A assembled and analyzed all information and data collected and reviewed and developed tentative conclusions and recommendations. We submitted a draft report to the Interim Vice President for Student Affairs and AVP on June 5, 2016.
- ▶ **Final Report:** K&A revised the draft report in response to comments and clarifications submitted via email on June 10 and discussed during a conference call with the Interim Vice President, AVP, and Director of DRC on June 15. This is the final report of the project.

Findings and Analysis

Overview of Findings

The profile and number of students registered with the DRC at Cal Poly Pomona has changed dramatically and rapidly in recent years, with an increasing number of students (both in count and as a proportion of students seeking services from DRC) presenting with non-physical disabilities, such as autism spectrum disorders (ASD), attention deficit hyperactivity disorder (ADHD), psychiatric disabilities, and learning disabilities. Leadership and staff shared stories—similar to those that have become more and more common on other college and university campuses—of engaging with students with any of those disabilities who are struggling with academic, personal, and social challenges, inside and outside of the classroom. The President has recognized that the University does not have the fundamental support systems and structures in place to help these students navigate their University experience, recognize and use the resources available to them, and thrive and succeed. Her assessment is that the University does not have sufficient professional training for faculty and staff to learn how to interact with and support these students; both faculty and staff may misinterpret these students' behavior as intentionally disruptive or inappropriate, or even react with fear or trepidation, rather than be comfortable in engaging with and referring students for assistance.

This shift in the characteristics and needs of students with disabilities has created a particular challenge for DRC, because of its current staffing pattern and the difficulty it has faced in trying to reorient staffing toward services for students with ASD, ADHD, and psychiatric or learning disabilities. The current staff of 16 includes four full-time staff serving deaf/hard of hearing students, though less than 1% of students registered with DRC require interpreting and captioning services. The University attempted to restructure DRC by laying off these staff members and replacing them with professionals who have the required experience and skills to meet the needs of the DRC's current registered student population. Deaf/hard of hearing students still require services at the University, and the DRC had planned continue to respond to their needs while integrating new personnel into a different structure. The union representing the four staff members who were to be laid off protested, and the CSU Chancellor's Office ultimately rescinded the layoff notice, so these staff members have been retained and continue to work in the Center. The reversal of the University's intended action has created an understandably uncomfortable situation in the

DRC, although the Director reported that the work climate has since improved; however, a larger, long-term, and more vexing problem remains in how best to deploy the four full-time staff deaf/hard of hearing services staff who comprise a significant proportion of both the DRC staff and its personnel budget, while still sufficiently meeting the needs of the University's increasing population of students with non-physical disabilities. The scope of this problem will grow with every quarter if current trends in student disabilities continue.

In an earlier, compliance-based conceptualization of its roles and responsibilities at Cal Poly Pomona, the DRC functioned primarily to process accommodations, and it was not envisioned and developed as a broader resource for the campus. The President, AVP, Director, and other staff now seek and aspire toward a more substantial and inspirational approach that serves students and the campus more broadly and effectively. As the Director put it, "I don't want to just process accommodations, I want [DRC] to be part of the student experience." In particular, the DRC seeks to emulate the approach and success of the ARCHES¹ program, which is located organizationally within the DRC and reports to the Director but operates independently with federal funding by providing selected students who have a documented permanent disability with a spectrum of more intensive, intrusive support services to help them succeed academically, personally, and professionally.

The Director has already undertaken a number of managerial and organizational steps to enhance infrastructure, services, and support in DRC, including (1) revised position descriptions, increased training, and redeployment of intake staff; and (2) a proposed reorganization that will increase efficiency and further define the resources DRC seeks to provide for both ensuring accessibility and supporting student success. Several interviewees acknowledged that further professionalization of the existing staff will be required to achieve these goals.

At the same time, the President has expressed concern about silo-ing services for students with disabilities within the DRC, as opposed to developing and sustaining a broader-based approach that engages the whole campus. Ensuring the full participation of all students with disabilities—by providing the environment, opportunities, and resources that will enable them to thrive and flourish, as well as contribute to the flourishing of others

¹ Achievement, Retention, and Commitment to Higher Education Success — a TRiO support services project.

—is a challenge and commitment for the entire University, not just the DRC. Students should not be challenged with having to navigate the organizational and administrative structure of the University to connect with the services they need; faculty, tutors, and other academic support and student services staff who interact with students need to be prepared to engage with and refer students with known or unrecognized disabilities effectively. In particular, faculty require the professional development and resources to better understand how to manage relationships with students and how to design courses, teaching methods, and assessment processes in ways that benefit every student.

There are likely many more students who have recognized and diagnosed learning disabilities who, for lack of awareness, stigma, or other reasons, have not registered with the DRC, as well as students with unrecognized and undiagnosed disabilities; the President wants to ensure that all of these students are at the center of the University's strategy so they can determine who is not being served and ensure that a robust and durable network of support on campus helps connect them to available resources. Such efforts will, of course, lead to increases in the number and proportion of students requesting accommodations and services through DRC, which in turn emphasizes the importance of developing practices and procedures, and aligning staff talents with roles and responsibilities, to ensure those services are delivered effectively, efficiently, and sustainably.

Cal Poly Pomona embodies an educational and pedagogical approach that is known for academic excellence, hands-on learning, and affordable tuition fees. Education takes place within and beyond the classroom, and students tackle real-world challenges, giving them an advantage as career-ready graduates.² The registered DRC students we interviewed for this review spoke appreciatively about the University's commitment to "learning by doing," and said that commitment encouraged them to enroll. The DRC has an opportunity to build upon that fundamental character of the institution, and also network with academic and other support services, to promote a truly supportive environment for students with disabilities—a campus climate in which they can connect and discover personal and academic intersections that will help them achieve success.

² Source: <https://www.cpp.edu/~aboutcpp/>.

Summary of Findings and Data Analysis

In the sections that follow, we provide integrated observations, findings, and analysis based on the combination of our data and document review and our remote interviews; we present our conclusions, assessment, recommendations as a summary list at the end of the report. The quotations included in our findings are unedited, verbatim comments—in an individual’s own words—that exemplify a particular perspective discussed during our meetings and interviews and/or describe an issue that emerged during our interviews in a unique or particularly clear way. Unless otherwise indicated, our use of a quotation indicates that the view or sentiment expressed in that quotation was also heard in similar words from others, as well.

Mission, Programs, and Priorities³

The mission statement of DRC is as follows:

The Disability Resource Center, in collaboration with the campus community, advocates for the equal access and opportunity for individuals with disabilities to be enfranchised in all aspects of University life by supporting personal, academic, and career development. DRC further seeks to empower students to fulfill their potential through self-determination, life-long learning, and growth.

The departmental overview in DRC’s annual reports provide the following description of its core functions:

- ▶ Assists 779 students with a variety of disabilities, providing resources and consultative services to students and faculty regarding disability and accessibility-related topics.⁴

³ The DRC provided completed forms for the Division of Student Affairs’ annual reports for the years 2010/2011, 2011/2012, 2013/2014, 2014/2015, and 2016/2017. This section refers to data from the two most recent reports, with reference to previous reports as indicated.

⁴ The number of students registered with DRC has increased substantially in the past 4–5 years, from approximately 450 students in 2010/2011. The current 779 registered students represent 3.5–4% of the University’s enrollment; as many as 7–11% are registered with disability services in many other institutions, which suggests that, as DRC creates a more visible campus presence and increases students’ awareness of its resources and services, a significant number of other Cal Poly Pomona students may seek services.

- ▶ 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.
- ▶ Serves as the campus office to verify eligibility for services and determines reasonable and appropriate accommodations and support services.

The DRC's primary programs and services are as follows:⁵

- ▶ Alternate Media Services: Provision of printed classroom materials in an alternative, accessible format for students with visual or information-processing disabilities.
- ▶ Assistive Technology Center: A computing lab operated by DRC (“the only campus lab devoted to providing a fully-accessible computing environment”).
- ▶ Classroom Accommodations: Notetaking, Livescribe Pen, recording of lectures, and permission for use of laptops.
- ▶ Deaf and Hard of Hearing Services: Interpreting and captioning services in classes, academic-related activities, and campus events.
- ▶ Flexible Attendance: Includes [a link to guidelines](#) created by DRC for faculty; DRC meets with students to determine eligibility and then communicates with instructors.
- ▶ Housing Accommodations: Partners with University Housing Services and University Village to provide accommodations.
- ▶ Mobility Assistance: The intra-campus cart service.
- ▶ Test Accommodations
- ▶ Priority Registration

The most recent annual reports detail accomplishments and upcoming priorities for the DRC, for which we requested updates from the Director, as described in Tables 1 and 2 below.

⁵ Summarized in a separate, two-page document in the data and document inventory, and also detailed on the DRC's website: <https://www.cpp.edu/~drc/accommodations-and-services/index.shtml>.

Table 1. 2014/2015 Accomplishments and Status Updates

2014/2015 Accomplishments	Status Updates (as of May 5, 2016)
Evaluated student accommodation demand and restructured staff roles to align with operational and student needs to improve overall services for students and faculty	Full restructuring in place since April 1. Two additional job descriptions to be updated: Lead Interpreter/Deaf and Hard of Hearing Communications Coordinator and the Learning Disability/Mental Health Specialist. The Lead Interpreter job description is being reviewed by Human Resources; the Learning Disability/Mental Health Specialist may be revised in relation to recommendations from this review.
Refined communication process with faculty to ensure uniformity of information as it pertained to Testing, Deaf/Hard of Hearing, and Alternate Media, and developed a faculty handbook to assist with FAQs	The handbook is included among the data and documents provided to K&A, and the website functions as a working handbook, often with daily updates.
Utilized data and research to write and submit a multi million dollar Federal Student Support Services TRiO Grant (ARCHES)	Received \$1.4M grant.

Table 2. 2015/2016 Major Initiatives and Status Updates

2015/2016 Major Initiatives	Status Updates (as of May 5, 2016)
Implement new online student accommodation database to improve efficiency and delivery of services, and provide comprehensive training for students and faculty on effective utilization	Databases have been integrated and streamlined, and all DRC functions are housed in one location, including new student registration, testing accommodations, deaf/hard of hearing staff scheduling and student accommodation requests, Alternate Media, and Notetaking. It is a student interface database, so students can login and have complete control of their accommodations and their accommodation requests. The database allows for an immense amount of data, and eliminates the need for paper. This has greatly increased efficiency for all staff and general department functions, and has resulted in an overall increase of services, particularly in Notetaking, test accommodations, and alternate media.
Create DRC Department operations manual to align with Federal, State, and CSU laws and guidelines (for use by DRC Staff, Faculty, and Students)	Currently working with a consultant to complete.

2015/2016 Major Initiatives	Status Updates (as of May 5, 2016)
<p>Improve faculty outreach by working with individual departments to strengthen collaborative partnerships, while educating faculty on their role of ensuring equitable educational opportunity</p>	<p>The Director was scheduled to present to the academic senate in May and consulted with departments and colleges throughout the year to the extent available due to her significant management duties. “This is a PRIORITY for our office and has been identified as an initiative for next year.”</p>

A common theme across several annual reports is the continuing challenge of working with faculty to ensure that eligible students receive alternate-format course materials and other accommodations and, more generally, to ensure awareness of the faculty's obligations in regard to regulations related to access and equity. In addition, more recent reports identify a key challenge in developing outreach programming to proactively address the increasing occurrences of behavioral questions and concerns related to students diagnosed on the autism spectrum. Both of these topics emerged as common themes across our interviews, as well, as noted further below.

The annual reports include information about service to the campus and the profession; the Director and staff serve on 15–20 different committees and/or initiatives at Cal Poly Pomona, and DRC staff typically present at 1–4 local or national conferences per year. There is no evidence of scholarly work or leadership in professional associations, although the Ability Ally Program—which is administratively and financially supported by DRC—won an “Innovative Program Award” from NASPA (Student Affairs Professionals in Higher Education) Region VI in 2014/2015.

The reports also list external fundraising achievements, including the \$1.5M grant over five years from the US Department of Education, TRiO Student Support Services in support of ARCHES (2010/2011; renewed in 2015) and, in the 2016/2017 report, a \$281k grant toward ARCHES and a \$75k Kellogg Legacy Grant.

The DRC’s current FTE staffing (including ARCHES) is as follows:

- ▶ 16 Permanent
- ▶ 24 Temporary
- ▶ 12 Students

The educational preparation and terminal degrees of senior DRC staff are summarized in Table 3.

Table 3. DRC Staff Degrees

Name	Degree	School	Concentration
Ang, Gently	Ph.D.	Fuller Theological Seminary	Clinical Psychology
Duran, Patricia	MPA	California State Polytechnic University, Pomona	Public Administration
Flanagin, Jimmie	Ed.D.	University of California, Irvine	Education Technology Leadership
Hernandez, Liz	M.Ed.	University of Southern California	Higher Education
Martinez, Adaly	M.Ed.	University of Southern California	Postsecondary Administration
Passeggi, Tracee	J.D.	University of Oregon	Law
Ramirez, Yesenia	M.S.	University of La Verne	Educational Counseling

Staff Roles, Responsibilities, and Redeployment

As noted in the annual reports, DRC is in “full implementation” of updated job descriptions as of the start of the spring quarter— 14 of 16 descriptions have been updated. The Director inherited staff members with capabilities that were not well-aligned with their roles, and she reports that the revisions have helped staff feel more comfortable with their current responsibilities. The following sections summarize some of the changes that were described to us.

Intake Coordinators

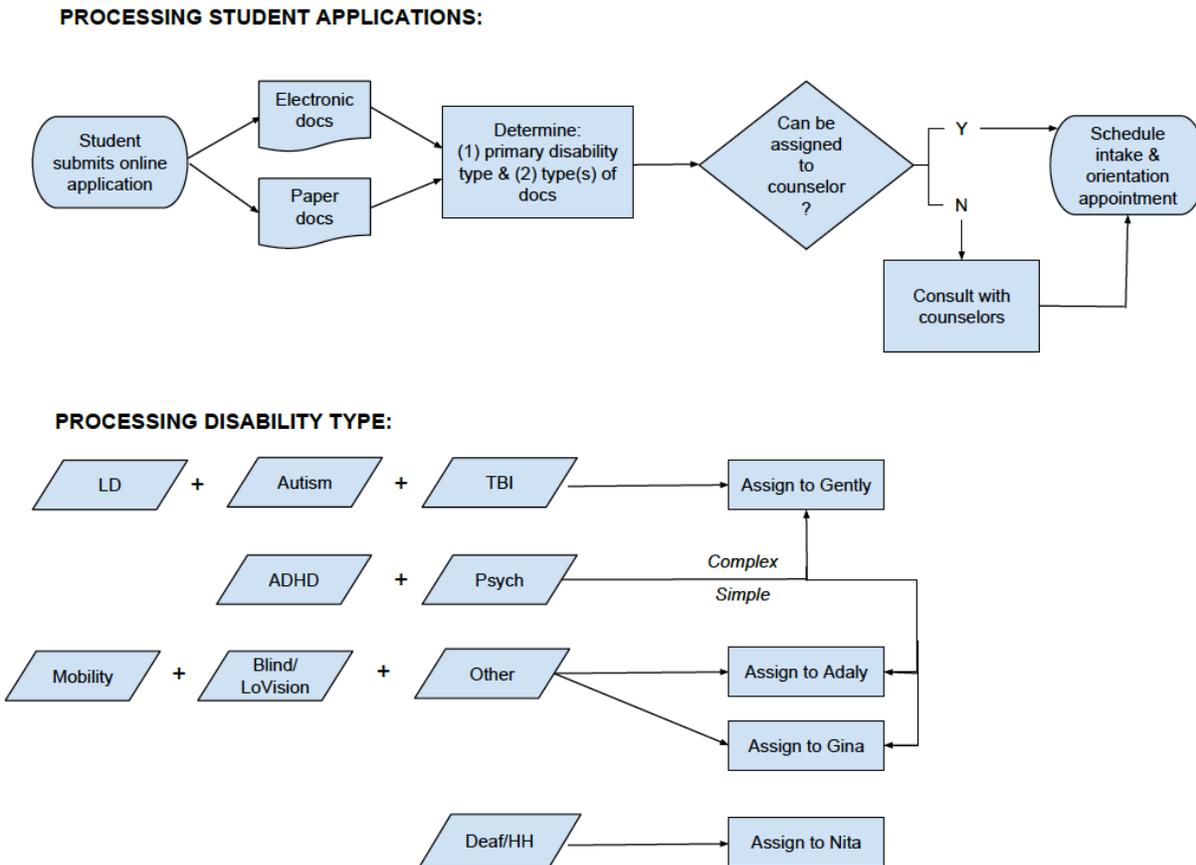
- ▶ Previously, the Learning Disability/Mental Health Specialist, Dr. Gently Ang, performed the vast majority of DRC intakes for students with learning disabilities, including ASD and ADHD, while another staff member, Gina Dravis, who had limited professional training, worked only with students with physical and sensory disabilities— 12% of the DRC student population.
- ▶ We were told that the Learning Disability/Mental Health Specialist was “overwhelmed” with the previous intake arrangement. The Director investigated other CSU institutions and found that intakes are typically done by an SSP III-level position (Dr. Ang is a full-

time, tenure-track faculty member), but the person in that role—Ms. Dravis—had not been qualified to do that work. The Learning Disability/Mental Health Specialist employs a more clinical approach in completing intakes for the large population of students with complex learning and mental health disabilities, ASD, and ADHD, which is time intensive and helpful, but did not assist the DRC in meeting the increasing demand for accommodations for students with those disabilities in a timely fashion.

- ▶ In the current, revised model, two Student Services and Academic Support Coordinators—Ms. Dravis and a new position, held by Adaly Martinez—assist in screening students with learning disabilities, ASD, ADHD, and/or mental health concerns (as well as those with mobility and vision impairments), while the Learning Disability/Mental Health Specialist manages those with more complex mental health conditions (as well as traumatic brain injury). The small number of students who are deaf/hard of hearing are assessed by Nita Vazquez, Deaf and Hard of Hearing Communications Coordinator. Both Student Services and Academic Support Coordinators were trained by an external consultant, and the Learning Disability/Mental Health Specialist developed a certification form for ADHD and psychiatric disabilities that encapsulates the essential information needed for the two coordinators to authorize basic accommodations. The Learning Disability/Mental Health Specialist acknowledged that this new system is not perfect; occasionally students will have a more serious issue than is originally presented on paper, and, in those cases, the coordinators refer the students to her.

The new application protocol is illustrated in Figure 1 on the following page.

Figure 1. Student Application Process



- ▶ In addition to processing intakes and accommodations, the coordinators have also begun to provide basic supplemental advising.⁶ We were told this arrangement is still in its early stages—an initial step toward providing more supplemental advising in DRC, similar to the more intrusive support provided in ARCHES—and the Director and her staff may be in a better position to define what level of advising DRC can provide more consistently by next year, given the much larger size of their student population relative to the number of students served by ARCHES (700+ as opposed to 150).

Learning Disability/Mental Health Specialist and Documentation Review

- ▶ Dr. Ang, a licensed clinical psychologist, has a tenured faculty appointment and has worked in the DRC for nine years. Prior to her arrival, the DRC conducted psycho-educational evaluations, primarily, and there were 2.5 FTE clinical psychologists on the

⁶ The Learning Disability/Mental Health Specialist does *not* provide this in her interactions with students.

staff; following a review by the Department of Education, it was determined that there was a conflict of interest in having members of the staff in the same office diagnosing students and prescribing accommodations, and psycho-educational evaluations were discontinued. Dr. Ang is, and has been since her arrival, the sole clinical psychologist and faculty member in the DRC.

- ▶ When she was first hired, the description of her role included expert review of disability documentation, clinical intakes with students to verify disability information, and prescribing appropriate academic accommodations. However, she found the actual scope of her work to be very different in practice, primarily due to ongoing misperceptions about the services DRC provides. Many faculty and staff were still referring students for testing, and she spent a significant amount of time referring students to other agencies and providers; not only did they have to be evaluated by qualified professionals, but the accommodations they were seeking had to be adequately supported by required documentation. She estimated that she could have spent an average of two hours working on a student case if they had the documentation; if not, between referrals and followup, it might have taken five times as much time.
- ▶ Within the last year, under the Director's leadership, the DRC has "prioritized" students who come to DRC with proper documentation, and assumed a "hands off" approach with those who do not. The Learning Disability/Mental Health Specialist assembled a resource packet that the Center provides to students who have not been evaluated and do not have the necessary documentation; it includes a list of clinicians off campus whom the DRC trusts to provide adequate documentation, which she updates regularly. We heard that this intervention, coupled with revised intake procedures, has reduced the wait time for an intake appointment from 21 days to less than a week.
- ▶ Health and counseling staff regularly refer students whom they have screened to DRC; however, there is no one on the SHCS staff who specializes in cognitive disorders, and clinicians feel it is not within the scope of their practice, or do not feel confident professionally, to give a definitive diagnosis. The Learning Disability/Mental Health Specialist still has to spend a considerable amount of time with these students, helping to refer them for evaluation and documentation. She estimates up to 25% of their intakes per term are students referred from health and counseling with a suspected

learning disability. The current DRC protocol is to provide provisional services if a student has documentation of some type of screening that was done in health and counseling, even if just a diagnostic impression.

- ▶ The Learning Disability/Mental Health Specialist estimated that she typically conducts about two student intakes per day, including her review of documentation prior to the visit. She also leads bi-weekly case consultations with the coordinator of ARCHES and the two Student Services and Academic Support Coordinators. She described a high degree of external consultation with other departments (Student Health and Counseling Services, Student Conduct and Integrity, Housing, Financial Aid), service on several University committees, and coordination of training workshops.
- ▶ Her availability for such consultation has been improved by the DRC's new approach to students without documentation. She admits that while her work situation is "much more sane," she feels badly having to tell students without documentation, "Here's the resource packet, do your best." Some students return from their assessments with negative feedback, primarily because they disagree with the diagnosis or their questions weren't answered; she then provides additional support to these students.⁷ Her impression is that their current approach lessens work up front, but still may not ultimately prevent work later on—by which time "a poor student has been put through the ringer and is still dissatisfied." She added, "I have an ethical obligation to make sure students are connecting with the services they need."

Deaf/Hard of Hearing Services Staff

- ▶ We were told the DRC is "locked" into their current arrangement of having four deaf/hard of hearing services staff, the only CSU institution with such a staffing pattern, and they must rely on attrition and retirement to resolve it. The Director noted that these staff are making \$70k annually for ten month appointments, a lucrative arrangement they are unlikely to find anywhere else for comparable work.

⁷ We also learned that the University provides some funding for students who require financial assistance for testing, but that these resources do not adequately cover the cost of services. DRC recently discovered that as many as 15 students they had referred for testing assistance did not receive any funding and were not able to complete the testing needed to qualify them to receive accommodations.

- ▶ The deaf/hard of hearing services staff interpret/caption in class 2–4 hours a day and spend the rest of their time editing. As noted in Figure 1, above, the Deaf/Hard of Hearing Communications Coordinator manages only intakes for the small percentage of the population that requires interpreting and captioning services. When the Director first assumed her role, the deaf/hard of hearing services staff often telecommuted; she planned and oversaw a remodeling of the DRC office that created individual offices for those staff members, which eliminated their telecommuting option and ensures that they are present and under observation and supervision every day. However, other DRC staff see the limited work they do and are frustrated by it.
- ▶ Despite the negative implications from the attempted layoffs, the Director reported that most of the deaf/hard of hearing services staff have behaved in a professional manner during the transition, although efforts to rebuild trust are still needed and are continuing.
- ▶ One way in which the deaf/hard of hearing services staff are being redeployed is in captioning faculty videos, which is an increasing need (and is part of the Director's proposal for an accessibility center on campus, as described further below). Cal Poly Pomona does not have a place where faculty may accomplish this; the Director has talked with these staff members about captioning faculty videos during downtimes in the quarter.

Position Descriptions

As noted above, all position descriptions have been updated (according to the dates of documents, within the past 1–2 years) as of the date of this report except for the Learning Disability/Mental Health Specialist and Deaf/Hard of Hearing Communications Coordinator; the latter update was in process at the time of this report. The following position descriptions were provided to K&A, with a brief breakdown of job functions for each (all 1.0 FTE except where indicated).

- ▶ Director: 35% personnel leadership and budget management; 15% programmatic and service delivery oversight; 10% student services/empowerment; 10% assessment and continuous improvements; 30% access, programmatic and compliance consultation
- ▶ Learning Disability/Mental Health Specialist: 70% disability-related counseling and consultation, 20% administrative coordination, 10% outreach and consultation

- ▶ Alternate Media Services Coordinator: 25% coordination, 30% management, 20% technical production, 20% student support, 5% campus and community involvement
- ▶ Two Student Disability Services and Academic Support Coordinators: 45% disability services, 45% academic support services, 10% administrative duties
- ▶ Deaf/Hard of Hearing Communications Coordinator: 40% direction and coordination, 10% campus involvement, 5% administrative tasks, 45% interpreting services
- ▶ Registration and Accessibility Services Coordinator: 40% new student registration and front office coordination, 40% accommodation services support, 15% mobility assistance cart coordinator, 5% classroom support services coordination
- ▶ Accommodations Specialist: 70% testing services administration, 20% note taking and Livescribe services, 10% administrative support
- ▶ Disability Program Specialist: 40% speciality and general administrative functions; 30% program planning, administration, and coordination; 30% campus consultation and training
- ▶ Two Realtime Captioners: 80% direct service captioning, 20% other duties (transcription, assistance, etc.)
- ▶ Interpreter/Transliterater: 80% direct service interpreting/transliterating, 20% other duties (materials, event assistance, etc.)
- ▶ Realtime Captioner (temporary/hourly)
- ▶ Interpreters (temporary/hourly)
- ▶ Assistant to the Director: 50% administrative support and coordination, 15% budget analyst, 15% office support, 15% support service accommodation coordination, 5% payroll
- ▶ ARCHES Staff: Project Director, Learning Specialist, and Administrative Assistant (all 100% toward the ARCHES program); Peer Tutors and Peer Mentors

Revised Organizational Plan

A key source of information submitted to the consultants for this review is the March 2016 presentation, “DRC Staffing Plan: Minimizing Institutional Risk and Supporting Student Success,” developed by the Director. It presents information and data in support of a revised organizational structure for DRC to better meet the need of current students. The

Director's proposed plan, as summarized in that presentation, was a primary stimulus for this review.

The presentation provides the following contextual data:

- ▶ As of Winter 2016, there were a total of 772 active DRC students—a 120% increase since 2008. Test accommodations have seen a steady increase, from 3,251 per year in 2011/2012 to 4,538 per year in 2014/2015.
- ▶ Eighty-eight percent of students registered with DRC have a non-apparent disability.
- ▶ Deaf and Hard of Hearing Services utilize 53% of DRC's staffing budget, but students utilizing captioning and interpreting comprise less than 1% of the DRC population. As previously noted, the original attempt to restructure staff in response to this misalignment of personnel with students' needs was rejected. The Director included this assessment: "Budget misalignment of Deaf/Hard of Hearing Services monies in proportion to student demand makes the department susceptible to institutional risk and limits its ability to sustain supplemental support services needed to foster student success."

The presentation summarizes areas of institutional risk at the DRC, with references to comparative data from other CSU institutions⁸:

- ▶ Evening test hours: DRC students with evening courses (during Winter 2016, a total of 617 students enrolled in 394 classes) must take exams during DRC's scheduled hours (8:00 AM – 4:30 PM) or have the professor provide the accommodation. Nearly all other CSU campuses offer extended testing hours.
- ▶ Student intake timelines: There is one staff member providing intakes to students with non-apparent disabilities, a ratio of 680:1. The average wait time is 5–7 days.⁹ DRC surveyed other CSU campuses and, among the respondents, 100% met with students for initial intake within 1–2 days (some on the same day).

⁸ We note that these factors affect not only institutional risk, but also the effectiveness of DRC and the University in being truly student-centered in approach and services.

⁹ We understand this ratio, and length of wait times, have been improved with revisions to the intake process, although it may still be too soon to assess the impact of the revised strategy on both.

- ▶ ASD behavioral conflicts: The percentage of registered DRC students with ASD has increased from 1% in 2007 to 7% in 2016. Cal Poly Pomona has seen a greater increase compared to CSU peers, probably due to its emphasis on STEM fields. These students often find themselves in front of Student Conduct and Integrity for reasons they do not understand and for behaviors that faculty and staff commonly misinterpret. Recent complex cases have required DRC “to devise and implement interventions, attend conduct hearings, and advise faculty...” but staffing makes it difficult to sustain this level of support. Some CSU campuses have specific or dedicated programs that support students who have ASD.

- ▶ Accessible instructional course material: There is no dedicated campus resource for faculty, staff, and students to go to for multimedia technology and online learning needs. Case law is cited to highlight the risk for litigation due to this issue. The faculty's need for captioning of classroom video is increasing, along with student complaints about the lack of captioning.

A faculty survey¹⁰ supported the need for accessible instructional course materials; among the findings:

- 90% have not requested training for creating accessible materials
 - 72% would attend training if it were available
 - 52% are not confident their course materials are accessible
 - 90% would send materials to a campus office offering services/support for converting print and digital materials to an accessible format
-
- ▶ Timely submission of course materials to the bookstore: Faculty Affairs’ guidelines for requesting course materials explicitly note the adverse impact of late requests on DRC’s ability to provide textbook and supplemental material, but in Fall 2015, three weeks prior to classes, 20% of alternate media requests were for classes to which a faculty member had not yet been assigned, so course materials had not been determined. Some adjunct faculty are still being hired in September. An Office for Civil Rights complaint was filed against CSU Fullerton in 2003, arguing that the failure of faculty to select course materials significantly reduced the capacity of their disability office to complete timely alternate media requests.

¹⁰ The survey had a 10% participation rate.

- ▶ Retention and graduation rates: From Fall 2008–2009, 67% of students with disabilities were retained, compared to 75% of their non-disabled peers; of the 2008–2014 cohort, 33% of students with disabilities graduated, compared to 61% of the non-disabled population.¹¹ Current staffing levels in DRC do not allow time for personalized guidance to help support retention; they argue, “A student support services program will provide an intensive level of assistance, individualized attention, and critical follow up to support the challenges of students with disabilities.”

According to a DRC student needs assessments survey from Fall 2014:¹²

- 78% have a difficult time managing or understanding their disability
 - 65% have a weak understanding of how to use accommodations to maximize their learning
 - 75% strongly agree they need help communicating with faculty about disability-related concerns
 - 80% need academic advising, but only 24% have met with their academic advisors
- ▶ Shared responsibility: Facilitating a campus environment in which students with disabilities feel supported requires one in which faculty have the resources they need to provide that support.

The initial next steps, as proposed in the presentation, included the aforementioned updates to existing job descriptions to better align with changing campus needs. The presentation concludes with two large-scale recommendations:

- ▶ Creation and appointment of an Associate Director to supervise the Student Disability and Academic Support team, ensuring timely delivery of accommodations and academic support; the position will handle direct case management of student accommodation concerns across the disability spectrum. This work of this position will mitigate institutional risks related to evening testing hours, intake timelines, ASD

¹¹ The consultants note that these figures do not provide evidence that the University thus far been as successful as it aspires to be in ensuring *full participation* by students with disabilities.

¹² An 18% response rate; there were 169 responses, so roughly 900 students were surveyed.

behavior conflicts, and retention and graduation rates. (The slide notes that permanent state revenue has already been allocated for the position.)

- ▶ Create an Accessibility Center that will provide training and guidance to faculty on the creation of accessible course materials. This will mitigate institutional risks related to accessible course materials, timely submission of course materials to the bookstore, and retention and graduation rates.

DRC also submitted existing and proposed organization charts for the consultants' review. According to the Director, she currently has 13 direct reports—"an insane amount," in her view, as well as ours—and the proposed reorganization and addition of an Associate Director would divide this in half, according to the revised chart. The Director would continue to oversee Accessibility Services, and the Associate Director would supervise staff designated as "Student Success": the Student Services and Academic Support Coordinators, Registration and Accessibility Coordinator, and ARCHES Program Coordinator.

We also received a copy of the draft job description for the position of Associate Director, the purpose of which is described as follows:

Under the supervision of the DRC Director, the Associate Director is responsible for assisting in the oversight and management of the Disability Resource Center (DRC). The position has specific responsibility for directing, organizing, and planning functions of the DRC, including administration of disability services and academic support. The Associate Director directly supervises the Student Disability and Academic Support Team and ensures timely delivery of accommodations and academic support needed for students with disabilities; handles direct case management of student accommodation concerns across the disability spectrum that are particularly complex or sensitive; oversees student complaints and concerns about department processes; supervises the Student Disability Services & Academic Support Coordinators, Registration & Accessibility Coordinator, and ARCHES Program Director, including the ARCHES program; and provides general oversight of the department in the Director's absence and represents Director on campus committees as assigned.

The responsibilities are divided as follows: 30% personnel leadership (over the positions as illustrated in the revised organization chart); 25% academic support services; 25% student disability services; 10% access, programmatic, and compliance consultation; 10%

assessment and continuous improvements. The required degree is a master's in counseling, psychology, student affairs, education, educational technology, or a related field.

Services for Students with Autism Spectrum Disorders

While another new position was not described in the documents and data submitted for our review, the Director articulated the need for a position that specializes in working with students with ASD, who, in partnership with the Learning Disability/Mental Health Specialist, could establish a strong semi-clinical and student support model.

Both the Director and Learning Disability/Mental Health Specialist offered justifications for the importance of providing greater support for these students:

- ▶ The Director's CSU system colleagues in disability services maintain a listserv and meet every fall and spring, and students with ASD are always on their agenda. Cal Poly Pomona has a higher percentage of students with ASD than their CSU peers because they are a STEM institution. Some of those institutions have more structured programs and leadership, such as Cal State East Bay and Long Beach State, though they have far fewer students on the autism spectrum. Parents now call the University after their children with autism are admitted and want to know what support Cal Poly Pomona offers—and they are currently lacking in such services.
- ▶ The demand for these services will continue to rise as more K–12 students who are diagnosed with ASD are able to enroll in college. They are admitted on the basis of academic indicators from high school that are a product of substantial support from special education services that are not available to them in college.
- ▶ Students with ASD represent a fast-growing group with significant academic, behavioral, and mental health needs requiring coordination with various campus departments across both Academic and Student Affairs (e.g., Student Conduct and Integrity, Student Health and Counseling Services, University Housing Services, Admissions and Orientation, etc.). Too many of these students withdraw or find themselves involved conflicts and disciplinary issues. The University is “putting out fires” involving these students but not doing enough to help them up front.

The Learning Disability/Mental Health Specialist more specifically recommended that case management of DRC students requires more than one licensed mental health clinician/specialist, not only for the increasing number of students with ASD, but also for addressing gaps in services with health and counseling on campus—specifically:

- ▶ Students referred by Student Health and Counseling Services for assistance with obtaining off-campus neuropsychological evaluations (due to suspected learning disabilities and/or ADHD), who are at least 25% of students served and require substantial clinical resources and inter-departmental coordination (including the Office of Financial Aid); and
- ▶ DRC students with psychological disabilities sometimes present with acute distress but may not be willing to access on-campus Counseling Services.

ARCHES

ARCHES (Achievement, Retention, and Commitment to Higher Education Success) was established in 1997 and is a subset of the DRC, housed in separate facilities. It is externally funded by TRiO grants through the US Department of Education. By the time of ARCHES' \$1.4M grant renewal in 2015, the program had received a total of \$5.9M in funding. Recent data on ARCHES student performance support the results of their work: 97% of participants remained in good academic standing, 94% were retained, and 59% graduated.

ARCHES provides the sort of student success programming the Director would like to offer to a larger proportion of students through the DRC, such as individual advising, peer mentoring, and tutoring. While DRC succeeds in meeting the legal mandate of providing students with disabilities access to accommodations, supplemental supports to facilitate student retention and graduation are lacking. “High-risk” DRC students (i.e., those with significant mental health, cognitive, and behavioral limitations related to their clinical conditions) who do not apply to, or are not admitted to, ARCHES are not served by the more intrusive advising and support services it is able to provide. The DRC lacks specialists to respond to students' requests for individual tutoring, ADHD coaching, study skills instruction, and supplemental academic advising.

ARCHES is organizationally housed under DRC, but the roles and funding of the two entities are separate. ARCHES is a retention program and does not provide accommodations; staff refer students who need additional accommodations back to DRC. At the same time, despite being physically removed, ARCHES is well integrated with DRC; the coordinator currently reports to the Director of DRC (although, in the proposed reorganization, she would report to the Associate Director). ARCHES staff attend all DRC staff meetings, and the Learning Disability/Mental Health Specialist holds a weekly case consultation with them.

We learned the following about the ARCHES program during our interviews:

- ▶ ARCHES students must be registered with DRC to be eligible for the program, and due to the requirements of the grant, one-third must be low income. ARCHES serves a total of 150 students, and with changes due to graduation, attrition, etc., they typically admit an average of 25 new students each year. The intake counselors in DRC refer students whom they think will be successful to ARCHES. As a retention program, ARCHES is mandated to graduate a certain percentage of students, so the program has to demonstrate that participants will persist and graduate.
- ▶ ARCHES usually receives more applications than there are available slots, although not by a wide margin; last year, ARCHES recruited for 38 slots and received over 45 applications. However, this year they are struggling to maintain their quota and remained in recruitment mode at the time of our telephone interviews. The coordinator suspects some students simply don't feel they need the additional support, and in some cases that may be true. Because ARCHES is an exclusive program, they cannot reach out to the broader campus to promote it.
- ▶ A separate document provided to the consultants very briefly describes aspects of the program with links to their website: quarterly advising (in-person advising and mid-term progress reports are required), peer mentoring (through appointments and workshops), peer tutoring (by request, limited to 1–2 hours per week), workshops and cultural events, and a graduation celebration.
- ▶ ARCHES employs two peer mentors who work with students on co-curricular skills, such as time management, decision making, and study skills. Every student in the

program has at least one meeting with a peer mentor; it is required for new students, and about one-fifth of students continue to meet with them on a quarterly basis. Incoming students take a learning assessment that helps to identify issues with which the peer mentors can assist them. Students may be more comfortable sharing some things with peer mentors as opposed to staff; the staff have bi-weekly case meetings with the mentors to discuss student cases. They recruit the mentors a year in advance, working with programs in Psychology and Sociology to identify candidates. It is a para-professional experience, and ARCHES wants to identify students who are interested in careers in this field. They conduct training one week before classes begin and on an ongoing basis.

- ▶ Peer tutoring is not mandatory but can be requested by students. ARCHES cannot provide tutoring for every subject, so they refer students for other support when they do not have the internal capacity to assist them. Peer tutoring in ARCHES is “extremely comprehensive,” more than other tutoring programs on campus. The majority of tutoring sessions are in STEM topics. Staff carefully screen tutors to make sure they have taken and did well in the class for which they will be provide tutoring services. The coordinator estimates that 39% of their students utilize peer tutoring.
- ▶ Students must meet with an advisor in ARCHES—either the coordinator or learning specialist—on a quarterly basis. Besides the initial requirement to meet with peer mentors, all other services—tutoring, workshops, etc.—are encouraged but not required. ARCHES is clear with students that they provide supplemental advising, and they clearly define the boundaries of what support they provide and what tasks students must accomplish with their official academic advisor.
- ▶ ARCHES staff take a holistic view of helping students reach their goals and manage their disabilities. Some students do not fully understand their disability, how it impacts them, and the implications it has for their educational experience. The vast majority —“99.9%”—of students request testing accommodations, but they may not be aware of other accommodations they can request to facilitate their learning.
- ▶ The types of disabilities represented among ARCHES students mirror those in the larger population that DRC serves. Like the DRC, ARCHES has had an increase in students with ADHD and ASD; they have also noted an increase in the number of female students who are registering.

- ▶ ARCHES may be starting to experience pressure points related to the increase in students who have behavioral challenges, such as a lack of communication and social skills. They have “ramped up” coaching on behavior and self-care techniques, but this requires more time than they have to devote to individual students. They are seeing some students several times during the academic year for different issues and have to be slow and intentional with some basic things; they try to coach students to help them avoid running into conduct issues. As the coordinator expressed, “It is not within our resources or scope of training to provide the level of service that these students need.”

Faculty Engagement

DRC has experienced challenges in working effectively with faculty, as documented in their annual reports and a previous external review in 2012 and as discussed during some of our interviews. We heard that when faculty learn they have a student with a disability in one of their classes, they may overreact and feel the DRC does not support them enough—which may have been true at some points in the past. The Director wants faculty to see DRC as an active and collaborative resource in order to gain greater confidence and trust. However, the scope of her management responsibilities makes it challenging for her to do very much outreach.

One issue relates to the absence of accessibility resources at Cal Poly Pomona. Faculty “get nervous” about creating accessible course materials, and DRC does not have the resources to help them in this area. It has not been “in the culture” of the faculty to collaborate with DRC in accommodating students; we heard one example in which a faculty member told a blind student to withdraw from a course rather than try to provide an accommodation for that student.

Several students we interviewed spoke about individual struggles they have had with faculty, who either refused to grant some of their accommodation requests or whose tone or body language they perceived as disrespectful and different from the way other students are treated. Some described faculty as “uneducated,” and one said it is a “struggle” to talk with them about disabilities; if a disability is invisible, some faculty do not understand why students are entitled to accommodations, and students feel they have to argue to defend and receive what they need. Others acknowledged that faculty are busy, and when they receive requests for accommodations, “they try to be nice, but there are

too many demands on their time.” One said the DRC did not use to have a great connection with the faculty, but “it’s getting better.”

Student Feedback

Many of the students we interviewed, several of whom were graduating seniors, spoke very appreciatively of the DRC and of changes they have seen in recent years. One has been “really pleased” to see the DRC “develop into incorporating more disabilities, progressively getting better in serving the integrity of students and the institution.” Another said, “With recent improvements, DRC gets an A+... very helpful, very sensitive, and very flexible,” and accessing services “relieves a lot of stress and anxiety.” One student commented positively on the transition to electronic accommodation requests, which removes any embarrassment students might feel in presenting hard copy forms to their professors, but said some students may have issues accessing and utilizing those forms; this student suggested a mediator or some common ground for those students who need extra help completing requests.

The sections that follow summarize additional comments and feedback from our interview with registered DRC students.

Desired Services

- ▶ A few of the students with whom we spoke were diagnosed with a disability earlier in their lives and were able to benefit from special services to help them manage their disabilities before going to college. Others who did not learn of their disabilities until college had to learn competencies on their own, or struggled for years before getting help. In one example, the student recounted showing records to Dr. Ang, who was finally able to steer him toward a proper evaluation, diagnosis, and accommodations.
- ▶ Some described having learned tools and techniques to manage common “triggers,” such as anxiety, depression, or lack of sleep. They would like to have more workshops and activities at DRC that help students “master their own disabilities and curtail or custom-identify issues and problems to improve ourselves.” One acknowledged the existence of such services in ARCHES.

- ▶ A few suggested that crisis counseling would be helpful. One suggested it could be an extension of Counseling Services, “but they don’t know much about disabilities—it would be great to have someone there.” Another student argued that Cal Poly Pomona needs to better use its existing resources and do something more: “Why not use the crisis resources we have [meaning Counseling Services], and involve them more directly? We’re paying for it, and importantly, they would not be counselors if they weren’t prepared.”
- ▶ A few commented on difficulty they had experienced in securing documentation for their accommodations. One said, “There needs to be more resources for students seeking documentation, if they don’t know their disability.” Another added, “It is incredibly hard to get accommodations for disabilities if you don’t have an Individual Education Program (IEP) from high school,” noting that her IEP included a clinical assessment, which helped her secure accommodations in community college. Yet another agreed: “Getting documentation from healthcare providers is frustrating and hard.”
- ▶ One commented that the DRC may be hard to access for people with physical disabilities or chronic illnesses; in response, another student noted the “golf cart” (mobility assistance service) DRC provides, although yet another said access to that may be limited, as well. One commented that the office is not easy to locate.

Transition to Cal Poly Pomona

- ▶ Many of the interviewees transferred to Cal Poly Pomona from a community college and talked about their experiences in the context of that transition:
 - One described the first visit to DRC as a “little intimidating”; at community college, services were arranged before classes, but arriving at Cal Poly Pomona and DRC was like being “dropped in” and needing to find one’s own way.
 - Another observed that there were fewer technology resources at community college, but there was more hands-on support, such as math and writing labs for students with disabilities, and a biweekly cognitive strategy workshop; “There was less technology assistance but more people to assist us.” At community college they found more of the training and preparation they would like to see at DRC.

- One student, who enrolled in Cal Poly Pomona directly from high school, did not immediately register with DRC because she did not think she needed services, and her high school counselor didn't suggest it. She thought she might have received more support as a community college transfer, and wished she had learned more about DRC during orientation; "It wasn't talked about." She ultimately registered for accommodations during her second quarter at the suggestion of a professor.

Disability Advocacy

- ▶ Several students talked about the importance of disability advocacy. One said she was attracted to Cal Poly Pomona because of the opportunity to "learn by doing;" "It's not simply that students with disabilities are different, but that they learn differently. Cal Poly should embrace that." They recommended focusing on educating professors and other peers. One said, "We know the environment cannot always accommodate us. We focus on what we can do well." And: "I embrace my disability and work through it. We're all different but gifted by the opportunity to be more widely understood."
- ▶ One student spoke about the [Access and disABILITY Alliance](#) (AdA), a group of faculty, staff, and students that presents programming and hosts events to increase awareness. The group is trying to advocate for the rights and abilities of people with disabilities not only across campus, but in the community. There are 38 members on the AdA roster but more than 500 people have received "Ability Ally" training.¹³
- ▶ AdA does not have a physical presence on campus—something a few mentioned they would like to see in order to increase awareness, or as one student put it, for students with disabilities to have a place on campus where they can congregate.¹⁴ (Staff members noted that more students are increasingly comfortable about discussing their learning disabilities more openly, but while racial diversity has been a prominent issue

¹³ The Ability Ally Program was created in January 2013 by members of AdA but is now supported administratively and financially by DRC; "Program highlights have included providing opportunities to students to become training facilitators; the production of a series of video testimonials featuring students sharing their experiences and views on disability; and the inclusion of Ability Ally Training in campus onboarding programs for new Orientation Leaders, Resident Life Coordinators, and Resident Advisors." Source: NASPA Innovative Program Nomination Form 2014.

¹⁴ AdA is a self-funded affinity group, separate and distinct from DRC; the type of space students have described would be similar in nature to the existing cultural centers on campus.

on campus, disability, although another kind of diversity, has not received the same attention or emphasis.)

Additional Student Feedback

The April 2012 external review also included praise from students:

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.

The students with whom they spoke recommended greater outreach to campus to improve the visibility and utilization of DRC.

Other DRC Information

Budget

According to financial data supplied by the DRC, its budget over the past three years is as summarized in Table 4 below.

Table 4. DRC Financial Data

	2013/2014	2014/2015	2015/2016
Total Compensation	\$952,155	\$849,115	\$927,671
Operating Expenses	\$36,333	\$125,115	\$48,014
Total	\$988,488	\$974,230	\$975,685

The authors of the external review done in 2012 described some challenges with the budget process—they note the base budget “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”—and there is no reserve to cover the deficit. They noted that,

worsening the situation, DRC is contacted by other departments for financial assistance with accommodations. They made no clear recommendation about how to address this, although they make several references to the challenges created by constrained resources.

As noted in the March 2016 presentation, over 50% of the personnel budget is allocated toward deaf/hard of hearing services staff, while less than 1% of the DRC population require these services.

Facilities

The April 2012 external review noted no deficits with regard to space, privacy, or confidentiality. However, later in the report the authors noted that test accommodation facilities were “relatively small,” and they recommended modifying signage to direct students to DRC, as they identified a lack of signage from the entrance nearest to the accessible parking and path of travel.

DRC space and facilities were not within this scope of this review, and we neither visited the DRC office (as all project activities were conducted remotely) nor discussed it during our interviews. After reviewing the final draft of this report, the Director indicated that the office underwent a large renovation project last year; in addition to adding designated spaces for all full-time employees (including offices for the deaf/hard of hearing services staff), the renovation also substantially improved their test accommodation facilities. She described the following specific enhancements:¹⁵

We converted our DRC conference room, that had been used for testing, into a brand new test center. Included in the redesign were 22 individual testing carrels with enhanced privacy. Six computers were added for those students needing limited distraction testing environment with a computer. Twelve cameras were installed. This included all the distraction free testing rooms as well as four in the test center. This past year we also converted the old staff kitchen into an additional five carrels for testing, these were also wired and can double as a nice study space for our students. Lastly, we purchased 24 lockers (located in the lobby) where students can securely store their belongings when testing. While space is always at a premium, especially when it relates to testing, the changes to the testing area have greatly enhanced the testing environment and our students have loved the changes. It has also enabled us to accommodate all test

¹⁵ Email to K&A, June 20, 2016.

requests within the DRC. In the past, particularly during finals, the DRC was often forced to look for additional places to administer exams. However, these changes allow for all exams to be taken at the DRC in a monitored environment.

The 2012 external reviewers also observed that ARCHES is in “cramped quarters,” where accessibility is “severely compromised” when multiple tutoring sessions are taking place simultaneously. The coordinator confirmed that they are constrained in the number of peer mentors and tutors they can have due to space limitations, but their current location is only a five-minute walk from the DRC and is adjacent to some academic departments and student services.

Strategy, Assessment, and Recommendations

Overview

Cal Poly Pomona must meet the needs of an increasing number of students with learning disabilities, psychiatric conditions, ASD, and ADHD, both through alignment of resources, services, and systems with the current profile of the population of students who have disabilities and by promoting an inclusive campus culture—through collaboration, education, and advocacy—that enables these students to thrive and flourish, wherever and however they connect with academic and personal support services. Full participation should be the University’s overarching goal. DRC’s strategy should align with the President’s vision for student-centeredness by ensuring that all students with disabilities—not only those who are diagnosed and registered with DRC, but also those who are diagnosed and unregistered, and those with unrecognized and/or undiagnosed disabilities—are appropriately served and sustained in the pursuit of their personal and academic goals. The DRC should play a visible leadership role by supporting the entire campus in helping students with disabilities find their individual pathways toward fulfillment and success.

The current staffing arrangement in DRC, with a significant proportion of staff and personnel budget devoted toward a very small percentage of its registered student population, is frustrating; however, it must not be an obstacle to developing an organizational structure, service model, and team of professional staff to meet students’ needs; nor can it prohibit the the University from imagining and realizing a holistic, cross-institutional approach to ensuring the full participation of all students with disabilities. This requires immediate attention and a creative—and different—approach, as the number and proportion of students with learning disabilities, mental health conditions that affect learning, ASD, and ADHD is expected to continue to grow in the years ahead.

Cal Poly Pomona benefits from a number of key strengths and assets that will support progress toward full participation for students with disabilities: a DRC Director who is committed to refining the Center’s vision to have a deeper and more inspirational impact on the students it serves, as well as on the attitudes and inclusiveness of the campus community; DRC staff members who, with appropriate direction, training, and encouragement, have begun to expand and extend the scope and impact of the services

they provide; and an institution that is fundamentally committed both to student-centeredness and to hands-on learning experiences that attract, educate, and professionally prepare students with learning abilities of all kinds.

The DRC has already taken a number of meaningful steps to better serve the current population of students with disabilities, through restructured roles and revised position descriptions for nearly all DRC employees, training and redeployment of key intake staff, and increased online resources for students, faculty, and staff. Further, the Director has recommended a strategy for the future of DRC that will enable it to have a greater impact on the academic success and personal development of the students it serves. Finally, a proposal to establish a faculty- and staff-serving function in DRC—which will provide more campus partners and colleagues with the resources to ensure accessible educational practices and experiences, as well as help transform attitudes about and approaches to different styles of learning—is consistent with the President’s vision for an institution that enables all students to achieve their educational goals. The University also has an opportunity, through their recently-integrated Student Health and Counseling Services (which includes Wellness Services), to include DRC in a broad, holistic, and comprehensive health initiative that extends its impact and better supports students within an institutional commitment to health, wellbeing, and safety. In sum, DRC is poised to lead a process through which Cal Poly Pomona can become a campus where students with disabilities of all kinds can feel welcome, supported, and capable of achievement and success.

During the course of this review, three primary proposals for changes and initiatives within DRC emerged. Based on our findings, we endorse and unequivocally recommend each of them:

- ▶ Proceed with a reorganization of DRC, creating distinct, parallel functions of accessibility services and student success, with the latter to be overseen by a new Associate Director who will contribute to the deployment, delivery, and assessment of complex accommodations and support needs *and* supplemental advising services.
- ▶ Establish an accessibility center in the DRC that will provide training, guidance, and resources to faculty on the creation of accessible course materials—and, in doing so, mitigate institutional risks related to the availability of accessible course materials, timely submission of course materials, and—ultimately—retention and graduation rates.

- ▶ Create a new clinical position, an Autism Spectrum Disorder Specialist, to (1) support the rising population of students with ASD; (2) serve as a liaison between DRC and Student Health and Counseling Services for students who need help diagnosing and documenting their learning disabilities; (3) assist faculty, staff, and administrators in better understanding and responding to the needs, challenges, and behaviors of students with ASD; and (4) promote coordination of other services for this population of students.

We believe each of these strategies will move DRC closer to aligning its human and other resources toward better serving the needs of both students with disabilities at Cal Poly Pomona *and* the institution as a whole, currently and in the future.

Assessment and Recommendations

In the sections that follow, we propose a refined vision for the work of DRC; assess the alignment of the Center's current functional and operational capacity and resources with the needs of current and future students; make recommendations through which Cal Poly Pomona can improve its preparedness, agility, and effectiveness in responding to both student needs and institutional priorities, in particular through enhanced relationships and levels of collaboration with the rest of campus; and conclude with an evaluation of DRC's strengths, weaknesses, opportunities, and threats going forward.

I. Vision and Mission

Key facts about the current population of students with disabilities at Cal Poly Pomona are cause for significant concern and—as the Director has persuasively articulated—areas of institutional risk:

- ▶ The number of registered DRC students has increased by 120% in the past eight years.
- ▶ The number of students registered with DRC is only 3.5–4% of the student population, when as many as 6-7% of students at other institutions are registered with disability

services and up to 10-11% of Cal Poly Pomona students may be eligible.¹⁶ With increasing outreach, it is highly probable that the number of students registered with DRC will only continue to expand over time, demanding additional resources and strategies to support them.

- ▶ The percentage of students with a non-apparent disability—a learning disability, ASD, ADHD, or psychiatric disability—has risen to 88%, though the training and experience of staff have remained oriented toward physical and sensory disabilities until only recently.
- ▶ Up to 25% of intakes at DRC are students referred from Student Health and Counseling Services with a suspected learning disability.
- ▶ The percentage of registered DRC students with ASD has increased from 1% in 2007 to 8% in 2016,¹⁷ and is expected to continue to increase.
- ▶ Among the Class of 2014, only 33% of students with disabilities graduated, compared to 61% of the non-disabled population—and 59% among students in ARCHES, which provides more intensive, intrusive supplemental advising and support.

The overwhelming majority of data regarding the current population of registered DRC students speak in favor of a revised and innovative approach to services—moving away from a focus simply on providing accommodations and toward a more sophisticated matrix of accessibility resources, academic and personal support services, and institutional commitments and communications that, taken as a whole, will ensure the development of a campus-wide web of caring for students of all learning abilities, wherever and however they identify the need for support.

The current mission statement and core functions of DRC embrace a broad approach—characterized by advocacy, support, and empowerment—though, as we note in our assessment of DRC against the CAS Standards for Disability Resource Services (see

¹⁶ The National Center for Education Statistics and other entities have conducted surveys to determine the percentage of college and university students who have disabilities, but these surveys have not yet been repeated and updated to account for the increase in students with a learning disability, ASD, ADHD, or psychiatric disability. There is no national database that provides reliable comparative data regarding the number or proportion of students who have registered with disability services, but based on our experience with many other institutions, the average is about 6–7%. The proportion of eligible students is especially high at STEM institutions, such as Cal Poly Pomona.

¹⁷ A 1% increase since the time of the March 2016 presentation.

Appendix), the Center should also articulate a visible leadership role on campus as part of its primary activities and future trajectory.

For greater clarification and transparency, we recommend articulating DRC's mission, vision, and strategy as having three different foci related to its core functions and the audiences whom those functions serve, as illustrated in Figure 2 below.

Figure 2. Model for DRC Mission and Vision



II. Assessment of Functions, Operations, and Alignment of Resources

New Organizational Structure

- ▶ A number of positive steps have already been taken to realign human resources with the needs of the current student population: nearly all position descriptions have been updated, an additional coordinator was added, and both coordinators received professional training and development to (1) help process intakes and accommodation requests for students with learning disabilities, ASD, and ADHD and (2) begin to provide supplemental advising to students. The new intake model is still in its infancy, but from what we have learned, it is proving successful: the wait time for intake appointments has been significantly reduced, and staff talents are better aligned with their positions, improving morale.

- ▶ DRC will need to determine the extent to which it can provide supplemental advising to the registered student population, and it will require further professional development and training for staff to do so effectively; it should be fully encouraged to proceed in that direction based on initial results. Providing supplemental advising may increase retention and persistence rates among registered DRC students (as it does among students in ARCHES), and these data will enable the Center to measure the impact of its revised approach and make adjustments where appropriate. DRC should also continue to conduct needs assessment surveys, in follow up to the Fall 2014 survey, to document improvements in areas such as the percentage of students who are able to manage or understand their disability, understand how to use accommodations, feel comfortable communicating with faculty about their concerns, and feel comfortable meeting with their academic advisors.

- ▶ The creation of an Associate Director position, and recruitment and appointment of a qualified and talented individual to that role, is an entirely appropriate, important, and justifiable step toward developing and leading a Student Disability and Academic Support function in DRC:
 - The Student Disability and Academic Support team will require its own leader to fully attend to the development, deployment, and assessment of supplemental advising services; handle case management of accommodations concerns across the disability spectrum; and mitigate institutional risks related to intake timelines, ASD behavior conflicts, and inferior retention and graduation rates.

 - The placement of an Associate Director will significantly minimize the management functions of the Director's portfolio, reducing her number of direct reports and necessary involvement in case management, thus allowing her to play a more visible and sustainable campus role in building awareness, partnerships, advocacy, and outreach. Achieving the goal of full participation requires dedicated leadership; the Director needs to be able to devote more of her time, mindshare, and bandwidth to that broad purpose.

- ▶ The Director has appropriately identified ARCHES as an exemplary model for what she hopes to achieve in the DRC as a whole. Implementation of supplemental advising in DRC will need to be phased and scaled due to the much larger size of its registered

student population, yet DRC might begin by adopting some of the features of ARCHES that contribute to student success, such as peer mentors, tutors, and workshops and programs. In particular, students we interviewed recommended workshops to help students learn best practices and techniques in how to manage their disabilities, avoid and address common “triggers” and obstacles, and learn skills of self care and independence. Such activities may be scalable to the larger DRC population and serve a range of students with different disabilities and learning styles.

Accommodations Intake Process

- ▶ The intake process has been further improved by the change in approach to documentation. While we acknowledge and appreciate the Learning Disability/Mental Health Specialist’s compassionate concerns and reservations about the revised approach—which “prioritizes” students with appropriate documentation—we agree with the Director’s recommendation in order to more efficiently provide services to the increasing number of students registering with DRC.
- ▶ Colleges and universities apply different methods for assisting students who need testing to support their requests for accommodations, though it is increasingly uncommon for the disability service to conduct testing on its own. Some, like Cal Poly Pomona, limit services for students who lack documentation, refer them to trusted providers who can perform testing, and offer some financial assistance—whether through financial aid or a discretionary fund for students with challenging circumstances—using a set of established criteria. Others provide testing services within certain guidelines through their counseling services, in which case the types of testing offered are defined by the capacity and expertise of providers and available resources.
- ▶ At Cal Poly Pomona, we recommend that Counseling Services begin to offer some provision of testing to meet the current student need and demand. We understand that Counseling Services has the instruments and capacity to do so, though there has been some opposition from providers due to ongoing disputes with leadership and administration about the percentage of time they devote to direct service to students (of which testing would be an example). As we explicate further beginning on Page 45, we recommend an organizational placement for DRC in relation to Student Health and

Counseling Services, and new leadership for the integrated health and counseling service should be charged with promoting the development of appropriate testing and documentation in Counseling Services.

- ▶ Until Counseling Services is prepared to provide testing, we recommend that DRC assess the proportion of students referred off-campus for testing and documentation who return with the required documentation and are able to ultimately receive accommodations; should a significant number of those students be lost or dissatisfied in this process, DRC should consider an additional case management function to ensure effective follow up. These findings will ultimately help support the case for providing testing in Counseling Services.
- ▶ The revised intake arrangement appears to have increased the ability of the Learning Disability/Mental Health Specialist to conduct case consultations, outreach, and education—all of which are a much higher and more appropriate use of her talents and expertise as a clinician. That said, her work activities, as she describes them, still suggest a significant amount of time allocated to guiding and referring students. The position description for the Learning Disability/Mental Health Specialist has yet to be revised, pending the outcome of this review; we recommend that the allocation of her time (currently 70% counseling consultation, 20% administrative coordination, and 10% outreach/consultation) be reconsidered alongside the responsibilities of the new clinical position to support students with ASD in order to ensure an appropriate division of responsibility between them in assisting high-complexity intakes and accommodations, case consultations and outreach, and individual student counseling, support, and referral.

Autism Spectrum Disorders Specialist

- ▶ The establishment of an Autism Spectrum Disorders (ASD) Specialist position is fully justified by the increase in students with ASD—at many colleges and universities, but especially at Cal Poly Pomona, as a STEM institution—and by the presence of similar roles at other CSU institutions (with fewer students with ASD), as well as by the complexity of adequately understanding and responding to the needs of these students. The percentage of students with ASD at the University is only expected to

continue to increase in coming years, and this position will help ensure that these students can thrive and flourish at the College.

- ▶ A dedicated ASD Specialist will be able to contribute to the retention and persistence of students with ASD in multiple ways:
 - Serve as a visible point of contact to help support students with ASD upon arrival at the University, connecting them with services first rather than allowing them to fall victim to disciplinary issues;
 - Coordinate with various campus departments across both Academic and Student Affairs (Student Conduct and Integrity, Student Health and Counseling Services, University Housing Services, etc.), and provide a case management function to ensure students are referred between services; and
 - Contribute to education, outreach, and services to help the rest of campus in learning how to engage with and refer students with ASD for support.

- ▶ The ASD Specialist should be established as a formal, functional liaison with Student Health and Counseling Services to assist with the quarter of total intakes who are referred from those services to DRC and help coordinate the cross-referral of students between the two. We agree that an additional clinical position in DRC is necessary, and that existing challenges in Counseling Services would not make Student Health and Counseling Services the best place for an ASD Specialist, but it is essential—and a priority of the President—that services to students with disabilities not become silo-ed within the DRC. The ASD Specialist must function as an active, visible liaison with Student Health and Counseling Services and be included in regular meetings and case consultations with health and counseling providers. (Connections between these services and DRC will be further supported by a revised organizational placement for DRC, as we recommend further below.)

- ▶ The position should be organizationally parallel to the Learning Disability/Mental Health Specialist, working collaboratively to meet student and institutional demands, and report to the Director of the DRC.

Other Successful Areas of Alignment

- ▶ Accessibility Services Staffing: With revised position descriptions in place, we find the senior staff of DRC to have the appropriate breadth of professional training and experience for effective delivery of accessibility services and accommodations. Student satisfaction levels are high, and DRC should continue to pursue other means of improving access to these services in response to student assessment and feedback.
- ▶ Use of Technology: DRC's databases have been effectively integrated and streamlined, vastly improving students' access to accommodations; this has led to an increase in the utilization of services overall, as well as an increase in efficiency for staff and general department functions. Students have received the changes positively, although some note that peers may still have challenges accessing and using online resources. These changes demonstrate early evidence of effectiveness, but we encourage DRC to assess awareness, utilization, and satisfaction going forward to ensure that effectiveness is sustained.

An additional charge of this review was to analyze how well DRC partners with faculty, departments, and programs; contributes to the President's focus on student-centeredness; and supports student learning and engagement. Our key findings in these areas are summarized below, as well as in our assessment of DRC against the CAS Standards for Disability Resource Services (see Appendix).

- ▶ Campus Partnerships: DRC has already undertaken a number of steps to increase outreach to faculty, departments, and programs, including through the development of a faculty and staff handbook and regular updates to the website. The Director has identified further faculty outreach as a high priority, and she will be able to increase her capacity to do so within the reorganized staffing model—as well as through the functions of the proposed accessibility center and revised organizational placement of DRC.
- ▶ Student-Centeredness: The student-centeredness of DRC was wholly affirmed by feedback from students and is well-reflected in actions and practices by current DRC leadership to improve services through online resources and reduced wait-times for intake appointments.

Opportunities for Alignment

- ▶ Student Learning Outcomes: An important and essential priority for the new student success function of DRC will be to establish and assess learning and development outcomes for students. The CAS Standards for Learning and Development Outcomes provide a helpful guide but need not restrict the DRC in thinking creatively and collaboratively about how it establishes, supports, and assesses desired outcomes for students. Assessments of student learning outcomes will provide a trustworthy framework for continuous quality improvement in student success services in DRC in the future.
- ▶ Operational Effectiveness: In addition, in order to effectively develop, deliver, and continually improve supplemental advising and academic success initiatives for registered DRC students, there must be operational, process, and program assessments related to retention and graduation, as well as regular surveys of students' awareness of, use of, and satisfaction with DRC programs and services.
- ▶ Evening Testing Hours: One area of institutional risk not directly addressed through any of the preceding proposals or interventions is the provision of evening testing hours. The proposal to establish the Associate Director position suggests that evening testing hours will be supported through that role; whatever the relationship of that position to this service enhancement is, we fully recommend that evening testing hours be provided to better serve students and to align with best practices at other CSU campuses.
- ▶ Transfer Student Support: Prior to our interview with registered DRC students, staff members encouraged us to inquire about the experiences of students who transferred to Cal Poly Pomona from community colleges. Staff suspected, and we affirmed, that these students found the process of connecting with DRC and requesting accommodations to be intimidating at first. We recommend DRC develop and design programs targeted to the transfer student population, working in coordination with appropriate campus partners to help identify, communicate with, and connect with these students to ensure a seamless transition to the University, continued academic success, and timely persistence toward graduation.

III. Recommendations: Meeting Student and Institutional Needs

Another matter of institutional risk identified by the Director is “shared responsibility on campus for helping students feel supported,” and this is a concern shared by the President, who wants to ensure that support for all students with disabilities is not silo-ed within DRC. The following recommendations pertain to our third recommended focus for DRC: to better serve the campus community through institutional resources, education, collaboration, and advocacy.

Accessibility Center

- ▶ We endorse the Director’s proposal to create a center that will provide training and guidance to faculty on the creation of accessible course materials, thus mitigating institutional risks related to the availability (and quality) of accessible course materials and timely submission of course materials to the bookstore. This is well-supported by the recent survey of faculty, which revealed that the majority of respondents would attend training for creating accessible course materials and/or send materials to a campus office to convert materials into an accessible format.
- ▶ The accessibility center can serve as an effective means through which deaf/hard of hearing services staff may be redeployed to assist faculty in captioning videos for their courses and online instructional materials. Demand for these services is increasing as more faculty are delivering courses online or in hybrid models, and it will only continue to increase as instructional techniques come to depend more frequently on media. There is no campus resource to perform this function, and deployment of existing staff toward this service will better—if not fully—align human resources with student and institutional needs.
- ▶ The center should not only provide services to individual faculty, but also perform a relationship-building function with academic departments and programs, serving as DRC’s functional arm for education and outreach. It should also develop partnerships with other units at the University that extend services beyond the classroom to elements of campus life and community engagement, such as University Housing Services and the Bronco Recreation and Intramural Complex (BRIC). With regard to the latter, the University of Victoria provides an exemplary illustration through its Centre for

Athletics, Recreation and Special Abilities, where the CanAssist Program “is dedicated to engaging students, faculty, and members of the disability community in a stimulating environment to develop innovative technologies and programs where there are gaps in existing services.”¹⁸ BRIC already promotes the availability of equipment and resources that accommodate people who have physical disabilities and could be a high-profile partner for programs and activities geared toward students with learning disabilities, ASD, and ADHD.

Organizational Placement of DRC

- ▶ In our review of Cal Poly Pomona’s Student Health and Counseling Services, we made a series of organizational recommendations that influence the possible placement of DRC to better and more fully support both student and institutional needs:
 - The name of the integrated service should be changed from Student Health and Counseling Services to Student Health and Wellness Services to more accurately reflect the inclusion of not only health (medical) and counseling services (both captured by the broad concept of “health,” which incorporates both physical and mental health), but also wellness programs and services (which are a unique strength at Cal Poly Pomona and an important entry point for many students to accessing health and counseling services).
 - Student Health and Wellness Services should be led by an Associate Vice President for Health and Wellness/Executive Director who reports directly to the Vice President for Student Affairs.
 - To broaden its campus impact, Student Health and Wellness Services should increase partnerships with programs and offices in Student Affairs, including but not limited to Housing Services, Dining Services, Athletics, and the DRC. The Associate Vice President for Health and Wellness/Executive Director should serve as an advocate for these services across campus, helping to foster partnerships and build bridges within and beyond the Division of Student Affairs.

¹⁸ Source: University of Victoria website (<https://www.uvic.ca/carsa/home/canassist/index.php>).

- ▶ In concert with these recommendations, we suggest that DRC be organizationally placed as a fourth function within Student Health and Wellness Services and that the Director of DRC report to the Associate Vice President for Health and Wellness/ Executive Director in order to foster stronger connections between and among services. There is a great deal of variation in the organizational placement of disability services at other colleges and universities: it was once common for disability services to be closely linked with health and counseling services, while in other institutions they have remained separate in order to avoid associating disability services with a medical model of support. Arrangements typically vary based on the approaches and attitudes at the particular institution; at Cal Poly Pomona, the holistic integration of health, counseling, and wellness services presents an opportunity to connect DRC to those services, with appropriate communication and clarification about the types of services DRC provides to avoid a medical or illness-related orientation.

- ▶ The Director of DRC has now become a member of the PolyCARES team. Many cases reviewed by PolyCARES involve registered DRC students, and she will likely be involved in more discussions with leadership in health and counseling as the institution broadens its focus on and commitment to health, wellbeing, and safety across campus. Additionally, the DRC's intentions to focus more deeply on student success and retention could help influence similar strategies across the spectrum of health, counseling, and wellness services, which are also services that help sustain students in achieving their academic and personal goals.

- ▶ To fully support the successful integration of DRC into the broad portfolio of Student Health and Wellness Services, many of the recommendations we provided in that review hold true here, as well, including but not limited to: robust collaboration and engagement of staff in decision-making, development of examples of functional collaboration between services, inclusion of DRC staff in all-staff meetings with intentional purposes and agendas, and very clear communications about services and the purposes behind their organizational connections so that students fully understand when and where to access the services they need.

College-Based Disability Liaisons

- ▶ DRC should identify a disability services liaison in each college whom students can visit as a first step toward seeking services and who can deliver information about policies and procedures, requirements, and resources to faculty and staff. These administrators or staff members should benefit from professional development and training to help prepare them to work with and refer students with disabilities, as well as to advise colleagues on the responsibilities of the institution to ensure the full participation and success of all students. The group of liaisons would become part of a web of caring that connects the faculty and staff in each college to DRC; students can touch any node in the web of caring—faculty or staff, or the liaison—and be linked directly to services.

Ability Ally Program

- ▶ The Ability Ally Program is an award-winning program and resource for the University that should play an increasingly visible role in connection with the redeveloped vision and organization of the DRC. To support the President’s commitment to campus-wide support for students with disabilities, we recommend additional institutional funding for the Ability Ally Program to increase training and outreach to faculty, staff, and students.

Space

- ▶ As a long term aspiration, Cal Poly Pomona should consider responding to students’ requests for a dedicated space for students with disabilities. This space may serve as a location in which students with disabilities congregate, meet with peer mentors, and—for new students—potentially be referred to DRC for initial support and services. Such a space will generate a sense of greater equity and inclusion for students with disabilities on the Cal Poly Pomona campus.

IV. Strengths, Weaknesses, Opportunities, and Threats (SWOT) Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> ▶ Mission and core functions ▶ Director's leadership—leading program review, resource alignment, and comparative research; redeploying staff; and developing a clear proposal and vision for the future ▶ ARCHES—federally funded, sound model for DRC to emulate; documented impact on retention and graduation rates ▶ High student satisfaction rates 	<ul style="list-style-type: none"> ▶ Existing organizational structure; excessive number of direct reports to Director ▶ Deaf/hard of hearing staffing model ▶ Ongoing financial constraints (related, in part, to the above) ▶ Limited ARCHES space ▶ Absence of student learning and development outcomes, and assessment thereof
Opportunities	Threats
<ul style="list-style-type: none"> ▶ Proposed organizational restructuring ▶ Associate Director position ▶ Increased advising, importing more elements of ARCHES model into DRC, leading to improved retention and graduation rates ▶ Leadership in creation of campus-wide coalition and network of support for students (and others) with disabilities ▶ ASD Specialist position, and liaison with Counseling in SHCS ▶ Student learning and development outcomes ▶ Scholarly work and service to the field ▶ Fundraising 	<ul style="list-style-type: none"> ▶ Increasing number and complexity of the needs of students with ASD ▶ Increasing number of students with learning and mental health-related disabilities in general ▶ Faculty lack of cooperation or awareness ▶ Misinterpretation by faculty and staff of students' behaviors; over-reaction and stigmatization of students with ASD ▶ Federal compliance issues ▶ Stigma and reluctance to access services ▶ Lack of expertise and assistance for counseling

Appendix: CAS Standards for Disability Resource Services

We recommend that the DRC at Cal Poly Pomona utilize the Disability Resources and Services standard developed by the Council for Advancement of Standards in Higher Education (CAS) in identifying credible standards, guidelines, and procedures for assessing its effectiveness and student learning and developmental outcomes.

Given the focus of this review on vision and mission, portfolio of programs and services, and alignment of human resources to meet the needs of Cal Poly Pomona’s current and future student population, we conducted a review of the CAS standards in these three categories against what we learned about the DRC’s mission, programs, and staffing, as well as the proposed direction, goals and objectives, and staffing of the Center going forward. In the tables that follow, we indicate whether we found the DRC to meet, partly meet, or not meet the standards based on data collected for the purposes and scope of this review; where we indicate “insufficient evidence to assess,” we mean that we did not gather sufficient information to determine DRC’s compliance with the standard because it was beyond the scope of the project, not that we found the information to be nonexistent.

Table 1. Mission

Standards	Rating or Status
<p>The primary mission of Disability Resources and Services (DRS) is to provide leadership and facilitate equal access to all institutional opportunities for disabled students.</p>	<p><i>Partly meets.</i> The mission includes advocacy and empowerment for students with disabilities, and a core function is equal access; the DRC has an opportunity to contribute leadership through a more visible role in developing a community that supports learning and success for all students.</p>
<p>To accomplish its mission, DRS must perform three duties:</p>	
<ul style="list-style-type: none"> ▶ provide institution wide advisement, consultation, and training on disability-related topics, including legal and regulatory compliance, universal design, and disability scholarship 	<p><i>Meets/partly meets.</i> Core functions include creating awareness, education, and consultation on federal, state, CSU, and university regulations, and resources on universal design; evidence of scholarship is limited/absent in annual reports.</p>
<ul style="list-style-type: none"> ▶ collaborate with partners to identify and remove barriers to foster an all-inclusive campus 	<p><i>Partly meets.</i> DRC demonstrates some collaboration with other academic support services and student services, but there is a greater opportunity for partnership with faculty, academic departments and programs, health and counseling services, and other campus colleagues to foster greater awareness and inclusion.</p>

<ul style="list-style-type: none"> ▶ provide individual services and facilitate accommodations to students with disabilities 	<p><i>Meets.</i> DRC continues to provide effective individual services and accommodations for students with disabilities and has improved application and intake procedures.</p>
<p>DRS must develop, disseminate, implement, and regularly review their missions, which must be consistent with the mission of the institution and with applicable and professional standards. The mission must be appropriate for the institution's students and other constituents. Mission statements must reference student learning and development.</p>	<p><i>Meets.</i> DRC's mission has been modified (according to recent annual reports); references aspects of University life including personal, academic, and career development; and indicates the DRC "seeks to empower students to fulfill their potential through self-determination, life-long learning, and growth."</p>

Table 2. Program

Standards	Rating or Status
To achieve their mission, DRS must contribute to:	
<ul style="list-style-type: none"> ▶ students' formal education, which includes both the curriculum and co-curriculum 	<p><i>Meets.</i> Through classroom and test accommodations and resources, housing accommodations, mobility assistance, etc.</p>
<ul style="list-style-type: none"> ▶ student progression and timely completion of educational goals 	<p><i>Partly meets.</i> DRC contributes to retention and persistence, though retention and graduation rates are still well below those of the non-disabled population. The provision of student support services will be designed to help improve outcomes.</p>
<ul style="list-style-type: none"> ▶ preparation of students for their careers, citizenship, and lives 	<p><i>Partly meets.</i> Impact on preparation for career and citizenship is unclear, though DRC services help many students learn to manage their disabilities in the context of preparing for meaningful lives (which will include those roles).</p>
<ul style="list-style-type: none"> ▶ student learning and development 	<p><i>Insufficient evidence to assess.</i> Primarily relates to a lack of evidence of learning and development outcomes and assessment of those outcomes.</p>
To contribute to student learning and development, DRS must:	
<ul style="list-style-type: none"> ▶ identify relevant and desirable student learning and development outcomes 	<p><i>Partly meets.</i> DRC furnished examples of program assessments, including assessments of the impact of timely vs. untimely alternate media, note-taking services, and test accommodations orientation. However, we did not see evidence of learning and development outcomes and assessment of those outcomes specifically; DRC will have an opportunity to develop these outcomes and strategies—using the CAS learning and development domains as a guide—as it implements a student success strategy as part of its portfolio of programs and services.</p>
<ul style="list-style-type: none"> ▶ articulate how the student learning and development outcomes align with the six CAS student learning and development domains and related dimensions* 	
<ul style="list-style-type: none"> ▶ assess relevant and desirable student learning and development 	
<ul style="list-style-type: none"> ▶ provide evidence of impact on outcomes 	

▶ articulate contributions to or support of student learning and development in the domains not specifically assessed	
▶ use evidence gathered to create strategies for improvement of programs and services	
DRS must be:	
▶ intentionally designed	<i>Partly meets.</i> The current proposal to reorganize structure and deliver additional services are all in response to data-driven needs and priorities.
▶ guided by theories and knowledge of learning and development	<i>Insufficient evidence to assess.</i>
▶ integrated into the life of the institution	<i>Does not meet.</i> DRC has an opportunity to create greater visibility and awareness through restructured leadership, accessibility services for faculty and staff, and increased advocacy and community development.
▶ reflective of developmental and demographic profiles of the student population	<i>Does not meet.</i> The proportion of deaf/hard of hearing services staff is out of balance with current student needs, and there are no staff members specialized to serve the increasing number of students with ASD.
▶ responsive to needs of individuals, populations with distinct needs, and relevant constituencies	<i>Partly meets.</i> DRC is in the process of taking deliberate steps to reorganize and deliver services that meet the needs of current students with learning disabilities, ASD, and ADHD.
▶ delivered using multiple formats, strategies, and contexts	<i>Meets/partly meets.</i> Primary accommodations continue to be delivered effectively. DRC has successfully implemented and enhanced online services, though accessibility may still be an issue; video captioning and other classroom services are still lacking, but proposed to be delivered through a new accessibility services function.
▶ designed to provide universal access	<i>Partly meets.</i> DRC ensures access for registered students but does not yet fully support faculty in developing and delivering fully accessible curricula, courses, and materials. These services are proposed to be delivered through the new accessibility services function.

DRS must collaborate with colleagues and departments across the institution to promote student learning and development, persistence, and success.	<i>Partly meets.</i> DRC collaborates with some academic support services and student services, as well as individual faculty, but has an opportunity to play a more comprehensive role in developing partnerships with academic programs and student support services to ensure a web and community of care that directs students to services that contribute to their retention, persistence, and success.
The scope of DRS must include the following five program components:**	
▶ appropriate and relevant office policies, procedures, and practices	<i>Meets.</i>
▶ individual consultation, accommodation, and service	<i>Meets.</i>
▶ proactive dissemination of information	<i>Partly meets.</i> Core functions include education, outreach, and consultation. DRC recently published a faculty and staff handbook and regularly updates its website. However, there is greater opportunity for advocacy and outreach to increase awareness and contribute to greater inclusion and full participation for students with disabilities across campus.
▶ institution-wide education, consultation, and advocacy	
▶ guidance and technical assistance to the institution on disability-related laws and regulations	<i>Meets.</i>

*For more information on the CAS Learning and Development Outcomes, please visit <http://www.cas.edu/learningoutcomes>.

**The section for programs also provides individual standards and guidelines for the program components, which may prove especially valuable in assessing the ongoing effectiveness of policies, practices, and accommodations, as well as new endeavors to increase communication and institution-wide advocacy.

Table 3. Human Resources

Standards	Rating or Status
Disability Resources and Services (DRS) must be staffed by individuals qualified to accomplish mission and goals.	<i>Does not meet.</i> DRC has effective leadership, a clinical staff member, and accessibility support staff to help provide accommodations, and intake coordinators have been recently trained to help meet current needs. However, as a whole, the staff composition and professional training are insufficient to satisfy its current goals and priorities and student needs.
DRS must have access to technical and support personnel adequate to accomplish their mission.	<i>Partly meets.</i> Technical support appears sufficient—development of online database was completed successfully—but provision of technical resources to support faculty are limited.

Within institutional guidelines, DRS must:	
▶ establish procedures for personnel recruitment and selection, training, performance planning, and evaluation	<i>Insufficient evidence to assess</i> , though recently-revised position descriptions will contribute to future recruitment, training, planning, and evaluation.
▶ set expectations for supervision and performance	<i>Meets</i> . They have performance goals and evaluations.
▶ provide personnel access to continuing and advanced education and appropriate professional development opportunities to improve their competence, skills, and leadership capacity	<i>Meets</i> . Successfully provided training to redeploy two intake coordinators and clinical staff member provides consultation. Staff regularly participate in trainings both in person and via webinars.
▶ consider work/life options available to personnel (e.g., compressed work schedules, flextime, job sharing, remote work, or telework) to promote recruitment and retention of personnel	<i>Insufficient evidence to assess</i> . The Director appropriately arranged for deaf/hard of hearing services staff to be in office <i>more</i> consistently, an important step toward more effective redeployment.
Administrators of DRS must:	
▶ ensure that all personnel have updated position descriptions	<i>Partly meets</i> . All but two position descriptions have been successfully revised.
▶ implement recruitment and selection/hiring strategies that produce a workforce inclusive of under-represented populations	<i>Insufficient evidence to assess</i> . DRC should ensure that its staff and workforce reflect the student population it serves.
▶ develop promotion practices that are fair, inclusive, proactive, and non-discriminatory	
Specialized DRS personnel, whether contract or staff, must have appropriate qualifications and applicable certifications.	<i>Insufficient evidence to assess</i> . Current specialized staff have appropriate qualifications; contract staff unclear.
Personnel responsible for delivery of DRS must have written performance goals, objectives, and outcomes for each year's performance cycle to use used to plan, review, and evaluate work and performance. The performance plan must be updated regularly to reflect changes during the performance cycle.	<i>Insufficient evidence to assess</i> . Recent revision of position descriptions presents an opportunity to implement performance expectations and evaluations carefully guided by new roles and responsibilities.
Results of individualized personnel evaluations must be used to recognize personnel performance, address performance issues, implement individual and/or collective personnel development and training programs, and inform the assessment of programs and services.	
DRS personnel, when hired and throughout their employment, must receive appropriate and thorough training.	<i>Meets</i> . Staff regularly participate in trainings both in person and via webinars.

<p>DRS support staff must be given training on the DRS mission to remove barriers within the institution through consultation, collaboration, and accommodation as well as on models of disability and concepts of universal design.</p>	<p><i>Insufficient evidence to assess.</i> We did not learn of the existence of such training; it was not mentioned in our interviews.</p>
<p>DRS personnel, including student employees and volunteers, must have access to resources or receive specific training on:</p>	
<ul style="list-style-type: none"> ▶ institutional policies pertaining to functions or activities they support 	<p><i>Meets.</i> Both staff and student employees undergo training. Student workers must sign confidentiality agreements and are subject to background checks.</p>
<ul style="list-style-type: none"> ▶ privacy and confidentiality policies 	
<ul style="list-style-type: none"> ▶ laws regarding access to student records 	
<ul style="list-style-type: none"> ▶ policies and procedures for dealing with sensitive institutional information 	
<ul style="list-style-type: none"> ▶ policies and procedures related to technology used to store or access student records and institutional data 	
<ul style="list-style-type: none"> ▶ how and when to refer those in need of additional assistance to qualified personnel and have access to a supervisor for assistance in making these judgments 	
<ul style="list-style-type: none"> ▶ systems and technologies necessary to perform their assigned responsibilities 	
<ul style="list-style-type: none"> ▶ ethical and legal uses of technology 	
<p>DRS personnel must engage in continuing professional development activities to keep abreast of the research, theories, legislation, policies, and developments that affect their programs and services.</p>	<p><i>Meets.</i> DRC provided additional information to illustrate professional development; in addition to the aforementioned training, staff members have attended conferences such as AHEAD, CAPED, International Technology and Persons with Disabilities Conference, the Interpreter’s Retreat Conference, “Educational Interpreting: It’s Not Just a Job, It’s an Adventure,” and Coordinators Advisory Network. Additional staff have been supported in receiving CEU credits, as well.</p>
<p>Administrators of DRS must ensure that personnel are knowledgeable about and trained in safety, emergency procedures, and crisis prevention and response. Risk management efforts must address identification of threatening conduct or behavior and must incorporate a system for responding to and reporting such behaviors.</p>	<p><i>Insufficient evidence to assess.</i></p>
<p>DRS personnel must be knowledgeable of and trained in safety and emergency procedures for securing and vacating facilities.</p>	

<p>DRS professional personnel either must hold an earned graduate or professional degree in a field relevant to their position or must possess an appropriate combination of educational credentials and related work experience.</p>	<p><i>Partly meets.</i> Multiple personnel have graduate and/or terminal degrees in several fields, as described in position descriptions; we learned that one intake coordinator does not have a required degree but has years of experience in DRC and has undergone recent training.</p>
<p>Student employees and volunteers must be carefully selected, trained, supervised, and evaluated. Students must have access to a supervisor. Student employees and volunteers must be provided clear job descriptions, pre-service training based on assessed needs, and continuing development.*</p>	<p><i>Insufficient evidence to assess.</i> We are aware of the use of student employees in DRC but learned little about their function, supervision, and evaluation during the course of this review.</p>

*There are also standards for interns or graduate assistants, but we did not learn of the existence of either within the DRC—though the provision of such roles might further contribute to the Center’s efforts to provide supplemental advising and other academic and personal support services.

CAS also provides additional standards that may be valuable to DRS in assessing its effectiveness going forward:

- ▶ Organization and Leadership
- ▶ Ethics
- ▶ Law, Policy, and Governance
- ▶ Diversity, Equity, and Access
- ▶ Internal and External Relations
- ▶ Financial Resources
- ▶ Technology
- ▶ Facilities and Equipment
- ▶ Assessment

Source: *CAS Professional Standards in Higher Education* (9th Edition, 2015). For more information: <http://www.cas.edu/>.