

Office of Services for Students with Disabilities

Program Review

Committee Response



Committee Members:

David Chase, Chair.

Christine Burke

Michael Elium

Nathan Finley

Shawn Kerns

Jennifer Murchison

Charlene Patterson

Susan Whitlow

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Introduction/Process

On October 3, 2011, Dr. Elizabeth Griego, Vice-President for Student Life, convened a committee to review Pacific's Office of Services for Students with Disabilities (OSSD). The committee consisted of the following persons:

David Chase, Assistant Dean, Conservatory of Music, Chair.
Christine Burke, Undergraduate Student, Communication Major.
Michael Elium, Assistant Dean, Benerd School of Education.
Nathan Finley, EA Developer II, Office of Information Technology.
Shawn Kerns, Graduate Student and Systems Administrator/TSP, School of Engineering and Computer Science.
Jennifer Murchison, Assistant Director, Student Disability Services, University of Memphis.
Charlene Patterson, Associate Director, Cowell Wellness Center.
Susan Whitlow, Learning Specialist, Office of Accessible Education, Stanford University.
Lisa Wrischnik, Associate Professor, Biological Sciences, The College.

The charge to the Committee was to review the OSSD program self-study report and the thinking of the staff represented in it, and to provide commentary and recommendations for improvement. As appropriate, committee members consulted with individuals familiar with the office and its services and reviewed documentation relevant to the operation of the OSSD. The committee was provided the OSSD self-study and programmatic standards from the Council for the Advancement of Standards in Higher Education as an initial basis for the review. The OSSD provided additional documentation as necessary, and information about serving students with disabilities at Pacific's McGoerge School of Law and Dugoni School of Dentistry was also made available. The committee divided standards to be addressed among its members, who then prepared draft reports for the final program review document. Comments on recommendations from OSSD are made as appropriate, and committee recommendations are also noted in each section.

Part 1: Mission

1. **Reviewed by:** Michael Elium and David Chase.
2. **Process of Review:** The section was reviewed by examining the current mission following a summative review of the other areas contained in this report.
3. **Consistency of Part 1 with CAS Standards for Disability Support Services (DSS):** OSS's mission statement is consistent with the requirements set forth in the CAS Standards for DSS. The current statement is clear, and its four strategies of

service delivery, appropriate advocacy, accessibility, and empowerment effectively communicate the scope of the OSSD's service to the University.

4. **Comments on Recommendations from the *Self-Study*:** The program review committee endorses the recommendation that the OSSD staff annually review the mission statement.
5. **Additional Comments:** The self-study provides commentary on the alignment of the OSSD mission with those of the Division of Student Life and the University. It is clear that the values of serving students and contributing to learning and development are well aligned. OSSD is commended by the committee for recognizing that the office plays a role in developing a positive campus culture with respect to disability issues.

Review Committee Recommendations: The OSSD staff, in conjunction with the Student Life Division, should carry out the plan to annually review the mission statement to see that the function and activities of the office meet the values expressed in the statement. The strategies of service delivery, appropriate advocacy, accessibility, and empowerment should be thoughtfully monitored through assessment to ensure alignment with the missions of OSSD, the Division of Student Life, and the University.

Part 2: Program

1. **Reviewed by:** Michael Elium and David Chase
2. **Process of Review:** The Self Study was examined in relation to CAS Standards for Disability Support Services; groups and individuals interviewed included the Director of the Office of Services for Students with Disabilities, the Vice President for Student Life, the Special Assistant to the President for Risk Management, The Director of Support Services, The Director of Human Resources, and faculty and students who are served by the OSSD.
3. **Consistency of Part 2 with CAS Standards for Disability Support Services (DSS):** Pacific's OSSD is primarily responsible for the intake and registration of students who report disabilities, and the approval and implementation of accommodations for these students. Other elements of the program include training for the campus community about disability-related issues such as institutional liability and best practice approaches that integrate other campus services such as housing, counseling, tutorial, and other support services with services for students with disabilities. Other activities include communication etiquette, planning accessible events, and providing consulting and training services related to providing direct service for colleagues at McGeorge and Dugoni. Other OSSD activities include assessment (student learning outcomes) and legal consultation to ensure the University maintains compliance with the ADA and Section 504 of the Rehabilitation Act.

The responsibilities and activities of Pacific's OSSD are aligned with CAS standards and best practices in the field of higher education disability support services. The

self-study provides an overview of policy and procedure and the responsibilities of OSSD staff. Statistics delineate the number of students served and hours committed to coaching, test proctoring, and providing transportation. Descriptions of procedures for note-taking, alternative formatting of materials, student advocacy, program advocacy, academic coaching, referrals to on and off-campus resources, training, and consulting demonstrate the extent to which the OSSD is integrated into the culture of Pacific, intentional and coherent, guided by theories and knowledge of learning and development, reflective of developmental and demographic profiles of the student population, and responsive to needs of individuals, diverse and special populations, and relevant constituencies.

The self-study's overview of the program provided examples of the challenges the OSSD must meet to provide services that are appropriate for Pacific and aligned with CAS standards and best practice in higher education. Succinctly stated, these challenges relate to staffing and to the development of shared responsibility and accountability across the institution.

4. Comments on Recommendations from the *Self-Study*:

- Given the increasing number of students receiving accommodations, there is strong need for additional staffing in order to provide a full range of program support to students with disabilities (see section following, on leadership). Areas of program that are most in need of augmentation include academic assistance detailed to identified disabilities; expanded training and consultation for the University community, especially on teaching and testing techniques for persons with disabilities; and appropriate provision of direct service to the remote campuses. The committee concurs with this recommendation.
- As noted above, a more direct means of communication and supervision at the remote campuses would assure appropriate legal compliance and more knowledgeable counseling, advocacy, and provision of accommodations to law and dental students. The committee concurs with this recommendation.

5. Additional Comments: Pacific needs to appropriately address the needs of serving students with disabilities on each of its campuses, and to see that these efforts are coordinated to ensure that responsibility and accountability is shared among faculty and staff.

Review Committee Recommendations: First and foremost, the OSSD should be adequately staffed. The University should allocate resources to ensure that it can deliver a level of service commensurate with CAS standards on each campus, and the organizational structure of the institution should reflect shared responsibility and accountability for serving students with disabilities.

Part 3: Leadership

1. Reviewed by: Shawn Kerns

2. **Process of Review:**

3. **Consistency Part 3 with CAS Standards for Disability Support Services (DSS):** Leadership in the program of Services for Students with Disabilities consists of the Director of SSD, a part-time temporary casual worker titled the Interim Coordinator, a graduate assistant, and work-study students. Mr. Danny Nuss, the OSSD Director is qualified for the role of program leader by virtue of extensive training and attendance at regional and national conferences and workshops. His participation in a consortium of disability service providers from private colleges in the Bay Area allows for an understanding of current practice at similar institutions.

The Director employs a mixed-method approach to leadership that is described in the self-study as a Management by Walking Around model. This approach centers on cultivating mutually beneficial relationships with campus stakeholders and appears to be very effective. The Director is particularly skilled at working out issues and resolving conflicts, and is highly regarded as an expert throughout the university.

4. **Comments on Recommendations from the *Self-Study*:**

- Staffing should be augmented so that the part-time Interim Coordinator position is replaced with a full time Coordinator. The committee strongly concurs with this recommendation
- Staffing should be augmented with a fulltime administrative assistant to replace the administrative assistant retained in the School of Education when SSD was administratively relocated to Student Life. The committee strongly concurs with this recommendation.
- It is strongly recommended that a university-wide advisory board for disability services be resumed. This advisory board should have the ability to make recommendations, contribute to policy development, and oversee disability renovations on campus. The committee strongly concurs with this recommendation, and further suggests that a formal system of liaison to key campus committees be established to develop shared responsibility and accountability for serving students with disabilities.

5. **Additional Comments:** The OSSD is significantly understaffed for the volume of students and staff it serves. Moreover the Director performs almost all administrative tasks, such as intake and follows up with students. Work-study students and temporary workers are not in a position to adequately manage the range of administrative tasks of the program; much of this burden falls to the Director and requires him to perform lower-level tasks, thus taking time away from higher-level management that is necessary and appropriate for his position.

Review Committee Recommendations: An OSSD Coordinator and Administrative Assistant should be permanent, full-time staff positions. A university-wide advisory

board needs to be established, and the Director of the OSSD should have formal opportunity to work with key campus committees, such as the Academic Council and the Academic Affairs Committee, on issues surrounding student disabilities.

Part 4: Human Resources

1. **Reviewed by:** Nathan Finley.
2. **Process of Review:** The Self Study section was examined in relation to CAS Standards. Mr. Finley discussed the recommendations with OSSD Director, Mr. Danny Nuss.
3. **Consistency of Part 4 with CAS Standards for Disability Support Services (DSS):** Staffing and Human Resource issues in the OSSD are of serious concern, and represent the greatest challenge OSSD has in addressing its mission and serving students. CAS standards for Human Resources call for adequate staffing and procedures for selection, training, supervision, professional development, and evaluation that cannot be met given the current structure of the office. The description of current OSSD staffing in the self-study (p. 24-25) demonstrates the inadequacy of staffing and support the office is faced with.
4. **Comments on Recommendations from the Self-Study:**
 - The OSSD has a need for a second full time professional staff member. A full-time Coordinator position could increase the capabilities of the office while also providing support for the Director position.
 - The committee also recommends the addition of a full-time Administrative Assistant.
 - The committee also agrees with the recommendation that the University ensure that the Director's compensation is at current market value.
5. **Additional comments:** The program does not seem to have a current strategic plan for further staffing, but rather it is reactive on an as-needed basis. Currently, the program is lacking a second full time professional staff member. A temporary/casual employee is currently filling the role of Interim Coordinator. However, the Interim Coordinator position is facing increased workload and responsibilities, and the need for a second professional staff member has increased. The Director is currently forced to pay for the Interim Coordinator position directly from the SSD annual operating budget. In addition, the Director is faced with limited administrative assistance, as there is no full-time administrative assistant. The only support the Director receives is minimal borrowed support from the Assistant Vice President for Diversity and Community Engagement.

Currently, the only staff member that receives an annual performance evaluation is the Director. In addition, the Director does informal evaluations with the Interim

Coordinator, student workers and any graduate students during the year. These informal evaluations occur through discussion or email correspondence. This sort of evaluation and staff development does not comply with CAS standards, and it is clear that the current level of staffing places too high a burden for the operation of the office on the Director. There is a clear and compelling need for more staffing.

Review Committee Recommendations:

The committee endorses the Human Resource recommendations made in the self-study. Both a full-time Coordinator of Disability Services and a full-time administrative assistant are vital to the success of the OSSD. It is unrealistic to expect the Director to provide direct service to students, leadership and training to the campus community, and handle the day-to-day administration of the office. Moreover, Pacific should ensure that the salary and benefits of the Director position are evaluated according to the CAS standard: “commensurate with those for comparable positions within the institution, in similar institutions, and in the relevant geographic area.”

Part 5: Ethics

1. **Reviewed by: Charlene Patterson**
2. **Process of Review:** The Self Study section was examined in relation to CAS standards. Dr. Patterson also reviewed documentation appended to the self-study and discussed ethical issues facing the program with the Program Review committee.
3. **Consistency of Part 5 with CAS Standards for Disability Support Services (DSS):** The program reflects attention to ethical consideration in its operation and direct service to students. The Director is aware of ethical guidelines and includes in new staff orientation training relevant ethical standards and practice. While there are specific references to aspects of ethical standards (i.e. confidentiality in both the *Policy Manual for Students with Disabilities* and the *2011-2012 Student Employee Handbook* in various sections of each document), there is no general reference in either document regarding the program’s general policy to uphold all relevant ethical standards and practices outlined by federal, state, and University regulations. Ethical standards are certainly *implied by* document descriptions of goals, guidelines, and operations and therefore *implied* as important underpinnings of the program.

Updating the manual and the handbook to reflect current ethical principles, standards and best practices is an additional goal identified by the SSD Director. While the Director deems the updating as a critical and necessary task, the very apparent challenge is accomplishing these major updates without additional staff to assume this or other responsibilities so that the Director can attend to this task. Given that the Director reports instances of clarifying updated policies to students and parents of students regarding more current practices, the program’s efforts to be transparent in publishing the Policy and Procedures for the program are

compromised when the document does not reflect current practices. This becomes a “truth in advertising” issue despite the truth in most instances reflecting better practice than is outlined in the present outdated manual and handbook.

The OSSD emphasizes the importance of confidential practices by hiring “staff who already have a good understanding of confidential principles and those who we feel can follow the guidelines.” In addition, staff members receive training and “...are required to sign an agreement of understanding that demonstrates an agreement to adhere to confidentiality (See “Appendix, p. 24) . It is noted that these agreements are in place for staff members, no such agreement form has been developed for outside providers who may service students with disabilities (i.e. interpreters for the hearing impaired). The absence of policy specific to outside providers and similar agreement form regarding privacy and confidentiality renders the program vulnerable to unintended breach of confidentiality.

With regard to research, the Director indicated that all research is pursued through the Internal Review Board and the program adheres to relevant university policies and procedures related to the protection of human subjects in research activities. The Director indicated that all previous research has been submitted to the IRB and approved prior to the beginning of any research activity.

Records are kept in a secure and locked space inside the Director’s office. Staff members are trained in the procedures for protection of permanent files.

The Director indicated that the program adheres to all procedures in accordance with University accounting procedures and fiscal policies of the institution. All staff members receive orientation and training relative to the policies and procedures culminating in the completion of the Training Checklist that confirms competencies in all of the training components. The Director indicated that with this specialized population, it is preferable to offer more “formalized disability training”, particularly for direct reports to the Director, who will assist with orientation and training of new staff.

4. **Comments on Recommendations from the *Self-Study*:** The committee concurs with the recommendation that office policies and procedures should contain intentional and specific language addressing ethics in the OSSD policy manual staff handbook.
5. **Additional Comments:** The program offers transparency by providing the Employee Handbook and the Policy Manual on the SSD website for review by the public. However, without updates to reflect current policies, practices and procedures, the ethical accountability the program is attempting to provide and reflect with this transparency is compromised. As well, the reference that the policy manual and the Student Employee Handbook should provide to staff members is presently, at best, incomplete if not inaccurate, and may not reflect the ethical underpinnings as well as the best practices that are presently in place.

Without more resources, it is unrealistic to expect that the Director will have time to address this significant undertaking.

Review Committee Recommendations: The review committee recommends that the OSSD develop or adopt and implement a statement of ethical practice in compliance with CAS standards and all relevant institutional policy and federal and state law (FERPA, HIPPA, etc.). The OSSD should incorporate these practices into its training programs and work assignments, and 3) that the OSSD incorporate a statement of privacy and confidentiality into all work agreements.

Part 6: Legal Responsibilities

Reviewed by: Lisa Wrischnik

Process of Review:

Consistency of Part 6 with CAS Standards for Disability Support Services (DSS):: The information contained in the Self Study is consistent with CAS Standards.

Comments on Recommendations from the *Self Study*:

Additional Comments:

The Program has been doing a good job ensuring Reasonable Accommodation for its students. The Director tries to stay informed about the newest forms of Assistive Technology (even if they are not always affordable), though at the rapid pace in which these technologies are developing, he may lag behind without some assistance. The Director has plans in place to provide readers, note-takers, etc. and the Program runs a highly-utilized cart ride service. The Director is readily available for consultations by faculty and staff and happy to work with faculty to help make curriculum adjustments. Until recently, the Program was able to provide adequate test-proctoring services to allow students to take exams in a distraction-free environment. However, with the loss of an Administrative Assistant, who helped to monitor exam-taking, this service is at risk, which may pose a problem for students and faculty who rely on this service to receive Reasonable Accommodation during test-taking.

Another issue may be one of existing physical barriers that limit student access to buildings, rooms etc. However, this is really outside of the control of the SSD Program, though the Director has been a member of a Transition Plan Committee whose job is to work with a developing Barrier Removal Plan, created in consultation with an architectural firm fully versed in ADA codes, to ensure compliance for all buildings, parking lots etc. campus wide.

The Director certainly appears knowledgeable about the legal ramifications of what his Department does, and has access to an ADA Compliance Officer and legal counsel retained by the University. The Director has also used the resources of the local Office of Civil Rights, although the Director lacks direct access to legal counsel. It might be prudent to

allow the Director some level of direct access to the University's legal firm because any issue the Director discusses in this context is protected information subject to Attorney/Client privilege, which is not the case for intermediaries, and this could subject the University to potential problems if legal action is initiated. If the University is unwilling to allow direct access to legal counsel, say a limit of 2 direct calls per year, perhaps the Director could work with supervisors to devise a limited number of "safewords" or "codewords" that could be used to generally define the extent and severity of the issue, so the Director could get the appropriate level of response, and in a timely fashion, when needed.

The Director has access to continuing training opportunities, which is crucial since the Director is the point person responsible for maintaining the proper running of the program and its ADA compliance. If new positions are developed in the program, it will be imperative that the new Coordinator and Administrative Assistant get the appropriate training for their positions, for example the Coordinator should be provided opportunities for specialized software training necessary to keep the SSD running smoothly and keeping it in compliance with regulations. With additional staff, the Director and Coordinator can also adequately cover training for the graduate and undergraduate students in the laws and regulations regarding working with students with disabilities.

All members of the SSD staff are told to contact the Director when a situation arises that may involve legal compliance issues, and having two trained members of the staff would be a valuable asset to the students, faculty and the University at large in the prevention of unwanted legal challenges. It might be a good idea to reinforce this message by placing it at the beginning of the Student/Employee Handbook.

It seems as if SSD does an extensive job working with students (for example, in consultations and initial disability screening) and is very clear about University policies, providing students with an extensive handbook (Policy Manual for Students with Disabilities) and information on the University website. However, the loss of Administrative Assistant support has hindered the Program's ability to adequately revise and update this manual, and may hinder how quickly students are informed of changes in policy.

The current Director would like to create an ADA Advisory Committee that could function when ADA compliance issues at any of the three campuses are under review. This seems to be a prudent way of combining input from various branches of the University to meet the needs of the University's mission and compliance with federal and state laws. It is also seems that there should be more interaction between the Director of SSD and members of Student Life at the Sacramento and San Francisco campuses, so Faculty and Staff at the Dental and Law Schools are aware of the resources available to them if they have a disabled student enrolled in one of the professional schools. Finally, SSD falls under the umbrella of Student Life, which is where it is located at many other Universities. This is not unreasonable given SSD's holistic and student-centered mission; however, there is a strong academic component to SSD, and it might be advisable to have substantial academic representation on any ADA Advisory Committee that may form.

Review Committee Recommendations:

Part 7: Equity and Access

1. **Reviewed by:** Shawn Kerns.
2. **Process of Review:** The Self Study section was examined in relation to CAS standards. Mr. Kearns met with the Director and consulted the program review team.
3. **Consistency of Part 7 with CAS Standards for Disability Support Services (DSS):** Interviews and observations have made it clear that constituents regard the OSSD as very fair, upfront, and accessible by all departments on the Stockton campus. The department staff is very courteous and highly responsive to students needs. Moreover the OSSD treats each case on an individual basis, without bias.
4. **Comments on Recommendations from the Self-Study:** Staffing in the OSSD provides the biggest challenge to ensuring consistent and effective equity and access.
5. **Additional Comments:** What polices and/or practices are in place to address? Because student workers and a graduate assistant handle the administrative tasks of the OSSD, it is difficult to address imbalances in participation among selected categories of students and imbalances in staffing patterns among selected categories of program staff members. The Director needs more assistance in daily work in order to provide a higher level of service to students. The high turnover and staffing unpredictability that accompanies a reliance on student workers creates an atmosphere where it is difficult to create a consistent working environment for more than one semester. The result is a need for significant re-training and more demand on the time and attention of the Director.

Review Committee Recommendations: The committee agrees that continually over-taxing the OSSD Director is counterproductive to the long-term goals and sustainability of the program, impacts service, and presents a potential liability for the University.

Part 8: Diversity

1. **Reviewed by:** Christine Burke
2. **Process of Review:** The Self Study section on diversity was examined in relation to CAS standards. Additional information was obtained from interviews with the OSSD Director and direct observation of the services OSSD provides.

3. **Consistency of Part 8 with CAS Standards for Disability Support Services (DSS):** The information contained in the Self Study is consistent with CAS standards. The OSSD does an excellent job encouraging diversity, and the entirety of the staff itself is representative of the diversity found on Pacific's campus. The office ensures the accessibility of resources to encourage people with disabilities to employ the facilities and services provided by the OSSD.
4. **Comments on Recommendations from the *Self-Study*:** The self-study does not offer recommendations for diversity.
5. **Additional Comments:** Areas where the OSSD could improve include the organization and/or facilitation of events with more efficient advertising. The orchestration of more events that involve the community and introduce people with disabilities to the campus before they become involved with Pacific would extend the reach of the OSSD and be of significant service to the Pacific community. It would also be effective to have more community involvement with campus wide events, and to sponsor leaders in the broader Disability Support Services community to speak on campus. Interested student volunteers who would be interested in engaging the community could be sought. The OSSD should also consider peer mentoring for students with disabilities; it may be possible to include such a program as part of an internship.

Review Committee Recommendations: The review committee recommends that more formal programming and training opportunities for community engagement surrounding diversity should be developed. A peer mentoring program is also recommended to assist with diversity efforts.

Part 9: Organization and Management

1. **Reviewed by:** David Chase
2. **Process of Review:** The self-study section on organization and management was reviewed and interviews were conducted with the Vice President of Student Life, the Special Assistant to the President for Risk Management, The Director of Support Services, The Director of Human Resources, and faculty and students who are served by the OSSD.
3. **Consistency of Part 9 with CAS Standards for Disability Support Services (DSS):** Given the relatively recent change in the OSSD reporting structure, some elements of organization and management are under development. Appropriate structure is evident in documentation appended to the self-study, including the Student Employee Handbook and the SSD Policy Manual. The Monthly Report to the Division of Student Life is an excellent tool to provide evidence of the management of OSSD on an ongoing basis. Disability Support Services are consistent with CAS standards to a remarkable extent

given the challenges for adequate staff, funding, and resources present in OSSD's current configuration.

4. **Comments on Recommendations from the *Self-Study*:** Recommendations were offered indirectly in light of the challenges to organization and management identified in the self-study and are addressed in the additional comments and review committee recommendations for this section.
5. **Additional Comments:** Interviews conducted with several managers connected to Disability Services at Pacific clearly demonstrated strong support for the OSSD, and for Mr. Nuss in particular. Despite the lack of a formal, organized committee or entity for comprehensive University policy concerning all aspects of Disability Services, individuals have been working together and solving problems largely on an ad hoc basis. There are, however, risks associated with the lack of formal institutional organization for Disability Support Services. While the University is assessing and prioritizing potential risks that may stem from a lack of compliance with facility accessibility, there is no formal transition plan; reaction to complaints is the primary vehicle for improvements.

Conversations with managers also made it clear that Mr. Nuss is often considered the primary campus expert for most issues concerning disability applicable not only to students but to faculty and staff as well. While this speaks highly of Mr. Nuss, and is reflective of the relationships he has built and the confidence the University community has in him, there should be a more broad and shared campus-wide understanding, responsibility, and accountability for Disability Support Services. The OSSD needs better access to key committees and constituencies and vice versa.

Disability support service efforts do not appear to be coordinated across Pacific's three campuses. The McGeorge School of Law and Dugoni School of Dentistry have policies in place to serve students on their campuses, but the entire University would benefit from a formal connection with respect to providing Disability Support Services.

The budget of the OSSD also appears to be in a vulnerable situation as 40% of funds allocated for operation are required for the salary of the Interim Coordinator. It is precarious for operating funds that should be allocated directly to providing services to be used for salaries.

Review Committee Recommendations: The review committee recommends that an advisory committee or board be formed to advise the OSSD on all issues of policy and practice for both serving students with disabilities, and for advising the University about issues that may present risk to the institution or need considered and informed resolution. The review committee also recommends that The OSSD Director be formally involved with key campus committees in an ex-officio capacity to improve shared responsibility and accountability for Disability Support Services. A structure where units

are required to send a designee to OSSD workshops every year may be advisable; that person can then disseminate information to the unit and document that this happens in meetings of the appropriate unit governance committee. Responsibility and accountability must be shared across the entire institution.

Part 10: Campus and External Relations

1. **Reviewed by:** Michael Elium and David Chase
2. **Process of Review:** The review process consisted of review of materials provided in the self-study in light of CAS standards discussion with campus personnel.
3. **Consistency of Part 10 with CAS Standards for Disability Support Services (DSS):**The Self Study demonstrates a remarkable degree of consistency with the CAS Standards given the staffing limitations of the OSSD.
4. **Comments on recommendations from the *Self Study*:** The committee concurs with the self-study recommendations concerning the development and implementation of emergency evacuation procedures and the involvement of an OSSD advisory board in policy development committees, academic review committees, and any other areas in need of Disability Support Service expertise.
5. **Additional Comments:** There should be an underlying philosophy that the entire University of the Pacific community and all its offices has a responsibility to ensure that students with disabilities are able to fully participate in University life. As a result, each of these offices should develop procedures demonstrating that the needs of students with disabilities are considered when programs, policies, or any activity is being planned. This should be documented in committee minutes and formal office procedures.

Review Committee Recommendations: In addition to the self-study recommendations and the integration of Disability Support Services into campus operation, The OSSD should consider developing a flowchart that begins with enrollment and accounts for the following:

Upon confirming acceptance of an offer of undergraduate admission to Pacific from an applicant who has self-identified a disabling condition, the student's name and disabling condition should be forwarded to the OSSD for follow-up. The OSSD can then initiate contact with the student, via a method that can be tracked, for example through the student's newly assigned Pacific e-mail account. Information can then be shared with the appropriate academic unit. For graduate students, the notification goes from the graduate school to SSD.

The OSSD should establish a web presence that invites students to contact this office in the event they believe they have a disability. Another method might be a quarterly announcement to all students.

Part 11: Financial Resources

Reviewed by: Lisa Wrischnik

Process of Review:

Consistency of Part 11 with CAS Standards for Disability Support Services (DSS):

Comments on Recommendations from the *Self Study*:

Additional Comments:

The OSSD was given a \$100,000 yearly budget after a review 7 years ago. The Director position is a fully-funded University position, but the Coordinator position is currently part-time and only temporary. Administrative Assistance was provided by sharing an Administrative Assistant position with the Benerd School of Education, which also funds a Graduate Student in Educational Psychology to help with academic coaching duties. Over the past several years, the number of students that use the program has increased dramatically without a concomitant increase in the Program's budget. Recently, the Program lost the use of a part-time Administrative Assistant, and the Coordinator is currently a temporary position. This Assistant was not only performing standard duties, but was co-opted into the role of test proctor because the Director and Coordinator had numerous other responsibilities, and placing a student in this position is highly inadvisable. The loss of this Administrative Assistant places a tremendous burden on the Director, who must be available for consultation with students, faculty etc., and cannot spend hours a day monitoring testing. With the help of a permanent Coordinator position and a new Administrative Assistant, the program should be able to adequately serve both students and faculty.

It seems the Director has been very budget-conscious in running the SSD program. The Director consistently makes decisions that have saved the Program money, and in past years he has managed to return funds back to the University.

The Program has recently lost Administrative Assistant support and must pay for a part-time Coordinator with part of its annual operating budget. With the loss of office support, the Director must spend valuable time scheduling meetings, revising drafts, and trying to coordinate the needs of every student who wants test proctoring, which becomes time consuming as each student has their own particular needs and requirements which must be taken into account. With the loss of this part-time staff position, and the drain on funds going to support the Coordinator, the funds available for student support services are at risk, and any cushion available to the SSD in case of an emergency dramatically reduced. For example, the Program often has to arrange accommodations for students who have accidents/injuries that impair mobility, or students who decide to undergo

testing in the middle of a semester, and a student who might want to tackle a course on their own can abruptly change their mind and request assistance. These types of typical emergencies do not even address the resource drain that could accompany hiring interpreters for multiple classes or labs. A student taking four lecture courses in a semester who requires sign language interpreters might need up to \$2000 a week in support.

Though the University has done an admirable job over the last 10 years in building up a centralized SSD Program, the Program is now in the spotlight and demand for their services is expanding past its traditional student base, helping faculty and staff with a number of ADA compliance issues. At the very least, given demands on its time and resources, the SSD should retain their previous support of a shared Administrative Assistant. It is also clear that with the number of services being provided by SSD, additional help in the form of a new, permanent Coordinator position is crucial to the continued success of the students in the program, the continued support for faculty in the form of Test Proctoring and other services, and the adequate training of the students working at the SSD. This is vitally important because it is the staff of the SSD that are the ones most likely to discover and help remedy situations that otherwise might result in penalties to the University in the case of a failure to provide legally mandated services (and avoid the threat of lawsuits and negative publicity). If the budget is allowed to remain at its current levels, the funding released from the support of an Interim Coordinator should provide more than adequate resources for the acquisition of necessary new technologies and training to support those technologies, as well as additional legal training for the Director and Coordinator, and improved training and supervision of the students employed by the SSD Program. Funds that are not spent in a year might be used to maintain a contingency fund, which would be available at short notice to support unexpected, and potentially expensive, demands. If this is not consistent with University policy, there should be some way for the Director to quickly access funding when an emergency arises, to prevent the University from failing to provide Reasonable Accommodation and subjecting itself to legal action.

Review Committee Recommendations:

Part 12: Technology

1. **Reviewed by:** Nathan Finley
2. **Process of Review:** The Self Study section was examined in relation to CAS standards. Additional information was obtained from interviews with OSSD Director and personnel in the Office of Information Technology.
3. **Consistency of Part 12 with CAS Standards for Disability Support Services (DSS):** Information contained in the Self Study is consistent with CAS standards.
4. **Comments on Recommendations from the Self-Study:** The committee agrees that the OSSD should work collaboratively with OIT and ATS to

acquire and maintain Assistive Technology as well as provide training for faculty, staff and students to ensure that technology, computer labs, website and online courses are accessible to individuals with disabilities. The OSSD should develop a list of technology standards that can be integrated in the development and testing of new technologies by OIT and the University.

5. **Additional Comments:** The OSSD Director should request inclusion in the Registrar's office classroom walk-through that occurs during the week of Spring Break every year. This process evaluates the current technology level of classrooms on the campus every spring. The Director should utilize the Student Life TSP for updates on technology and campus issues as reported by the TSP group either during the weekly TSP meetings or via the TSP email list. The Director should also utilize the EBP group for updates and changes related to business process and accessibility for new and incoming students.

Review Committee Recommendations:

Part 13: Facilities and Equipment

1. **Reviewed by: David Chase and Christine Burke**
2. **Process of Review:** The Self Study section was examined in relation to CAS standards. Additional information was obtained from interviews with the OSSD Director, Vice President for Student Life, the Special Assistant to the President for Risk Management, The Director of Support Services, The Director of Human Resources, and faculty and students who are served by the OSSD.
3. **Consistency of Part 13 with CAS Standards:** The information contained in the Self Study is consistent with CAS standards in a minimal way.
4. **Comments on Recommendations from the *Self-Study*:** The committee supports the OSSD recommendation, as stated elsewhere in this report, that an advisory committee be established for disability support services. Such a committee could establish priorities for transitioning facilities that are out of compliance with ADA regulations.
5. **Additional Comments:** Christine Burke has direct experience with many of the accessibility issues on the Stockton campus, and pointed out examples where facilities are accessible, but significantly different for students with disabilities. Rolf Jensen and Associates conducted an accessibility review of the Stockton campus, and the individuals responsible for ADA compliance are aware of campus-wide strengths and limitations.

Review Committee Recommendations: Pacific should establish an advisory committee for disability support services as soon as possible. Among other support, advisory, and

advocacy functions, this committee can prioritize needs for making facilities accessible and articulate risks with respect to ADA compliance.

Part 14: Assessment

1. **Reviewed by:** Michael Elium and David Chase.
2. **Process of Review:** The Self Study section was examined in relation to CAS standards, and assessment documentation provided as part of the self-study was examined.
3. **Consistency of Part 14 with CAS Standards for Disability Support Services (DSS):** The information contained in the Self Study is consistent with CAS standards; however the relatively recent transition of the OSSD to the Division of Student Life was accompanied by a new system for assessment. It is understandable that efforts in this area are new and expanding.
4. **Comments on Recommendations from the *Self-Study*:** The committee agrees that learning outcomes should be developed and assessed, and that additional reporting measures should be constructed for dissemination of data collected and additional follow-up measures should be established to ensure assessment is shaping the future direction of the program. The committee also agrees that faculty evaluations/assessment should move beyond the pilot study and should be administered across all academic units.
5. **Additional Comments:** CAS standards identify that the OSSD is required to assess both the program as a whole and student learning outcomes. Given staffing limitations, it does not appear possible for this level of assessment activity to be carried out on a regular basis. The self-study recognizes that initial assessment data “indicates that the services for students are helping to increase self-advocacy communication skills and that disability-related training is helpful for staff”; also: “faculty would like to have additional trainings offered and more resources available to support classroom learning.” It is clear that ongoing, trustworthy, and reliable assessment will play an important role in understanding the effectiveness of the OSSD over time.

Review Committee Recommendations: The review committee recommends that the OSSD continue developing and refining its program and student learning outcomes assessment system. It is further recommended that the OSSD focus on program assessment for the next few cycles, and partner with programs in the academic division to conduct assessment of student learning outcomes.

Date: August 23, 2012

To: David Chase, Chair, OSSD Program Review Committee

From: Susan Whitlow, M.A., Learning Specialist, Stanford University Office of Accessible Education
swhitlow@stanford.edu

Re: Summary of Committee's Response paper

The review undertaken by the committee was thoughtful and thorough. The largest issue for the Office of Services for Students with Disabilities is the need for additional staff. Danny Nuss cannot be expected to continue to perform multiple jobs. While it is hoped that 2 positions will be created (a coordinator and an administrative assistant), if this will not be possible in the immediate future, some alternatives need to be lined up. Perhaps more time could be allocated to the university's ADA coordinator position such that some of the consulting with faculty and staff could be lifted from the OSSD director's desk. Additionally, the administration of exams is a serious matter and requires a mature person who is well versed in confidentiality procedures. Often, university students are training to be professionals (e.g. pharmacists, teachers, speech and language pathologists) and would benefit from early practice in handling sensitive and confidential matters like exams for peers. Ideally, this will be handled by professional staff, but this could be a temporary way to manage exam proctoring—likely, the need for which will only increase in time.

I am concerned that the director does not have direct access to legal counsel. In my experience as a coordinator at two previous private schools, I was able to talk directly—when needed—to our school's counsel. This included in-house counsel as well as an attorney who was contracted off-site. While it sounds like this has long been the practice at Pacific, I would hope that it could be re-thought. There are many issues related to disability services that can generate unique legal questions that need a speedy response.

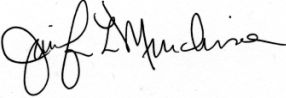
Finally, while it was noted that Mr. Nuss has really kept up the technology and assistive technology, a future of increased online programs may necessitate increased OSSD staff support. I did not see this addressed directly in the report. Most colleges, while largely brick and mortar institutions are increasing offerings online. While this may currently be limited to coursework platforms like Blackboard or WebCT, likely faculty at Pacific will expand their offerings to hybrid and perhaps all online courses. These offerings will require either a policy that mandates that anything posted must be accessible (e.g. captions, voiced descriptions, and accessible PDF's and the like) or increased OSSD staff time to determine how to make each site/course accessible.

Pacific is fortunate to have a committed professional in Mr. Nuss and he has strengthened a solid program into one that has made the most of limited resources. However, it is time to explore the expanding needs of this office.

Confidential Memorandum

To: David Chase, Assistant Dean, Conservatory of Music
University of the Pacific

From: Jennifer Murchison, Assistant Director, Student Disability Services
University of Memphis

Date: 5/31/2012 

Subject: Program Review for the Office of Services for Students with Disabilities

The Committee has done an excellent job conducting a thorough, supportive review of the University of the Pacific's Office of Services for Students with Disabilities and its Director, Daniel Nuss. Mr. Nuss is fortunate to work at an institution whose administration, faculty, staff, and students support him wholly as he works to ensure the equal treatment of the University's students with disabilities. I have had the honor of knowing Mr. Nuss for many years. In that time, I have gotten to know the inner-workings of OSSD from Mr. Nuss's point-of-view, and had the privilege of visiting the campus in October 2011.

The Committee's review has supported the request for additional financial, personnel, and administrative assistance at OSSD. In order to provide the best service possible to Pacific students, additional full time staff is essential. The complexities of a disability services office are tri-fold. Disability service providers protect the student from discrimination and provide them with equal access to all University programs and courses; we provide faculty with information and support in determining which accommodations are reasonable and appropriate, while maintaining the integrity of the institution's standards and program requirements; we also support the administration by staying updated on complex legal requirements and regulations, while educating ourselves on best practices and newest technology. We do this while maintaining ethical standards and confidentiality of students' highly sensitive medical and psychological information.

Judgment calls are a daily part of life for a disability service provider. Being able to consult on cases is absolutely necessary in running an effective program. Being able to delegate is essential for any office to run efficiently. If the Director is the only person covering every accommodation/service aspect, he will be stretched thin and students will be negatively impacted. I personally know Mr. Nuss would never want to see this happen. Providing for additional full time staff would open up possibilities for students. A stronger disability services program would be a real draw for many students in the Bay City area, as well as students willing to relocate to Stockton for enrollment at UoP.

I would also strongly recommend keeping the part time graduate assistants on staff. This will allow for additional assistance for students registered with OSSD. Maintaining the academic coaching these GAs perform will assist in supporting the mission of the office. In addition, you could have a GA designated for the time-consuming task of making materials accessible via tactile or electronic text as needed. Another GA could serve as an academic- and/or career coach. These GAs could also work as test proctors when possible.

Most disability service providers would tell you that they spend a majority of their time:

- 1) Helping the student transition from high school accommodations to college accommodations;
- 2) Determining appropriate accommodations for the student according to the course being taken, the program being studied, and the vocational goals the students (and sometimes their parents) have;
- 3) Activating and managing accommodations as needed;
- 4) Making course- and test materials accessible in audio- or tactile-formats;
- 5) Investigating allegations of discrimination (most often by correcting miscommunication and misconceptions);
- 6) Teaching students how to self-advocate;
- 7) Assisting the student with executive functioning and time management, particularly when additional study/reading time is needed;
- 8) Assisting the student in determining how best to manage their disability in the college classroom;
- 9) Assisting the student in conflict resolution with peers and faculty, when needed (sometimes just modeling behaviors and role-playing discussions help);
- 10) Coaching on how to self-identify on internships and in the work place;
- 11) Helping the student transition from college accommodations to internship/ work place accommodations

You might notice I did not list the actual paperwork/record-keeping involved in a traditional office environment. Nor the decisions, assessment and planning, education of self, campus, and community, actual test proctoring and scheduling, taking/answering/making calls and emails, answering everyday questions about the office, facilities' accessibility consultation, etc. I did not mention the meltdowns that occur when a student gets overwhelmed and he feels comfortable coming to you for help because he knows you are there and "get it". Or the student who comes in because a boy asked her out and a boy has never asked her out: what should she do? Or the student with ADHD who has worked with you for years and now feels comfortable talking about the abuse they experienced as a kid. When we get to know the student, we become a part of that student's life. They credit us with their successes. As one student tells me at the end of every semester, "So many days I was broken and you help me put the pieces that had fallen back together. Just knowing you were there supporting me kept me going."

A disability services office can provide more than just accommodations. It can do more than keep the institution out of the courthouse. It provides the chance for a student to show "I can do this." It creates not just a graduate, but an alumnus. Hopefully, this review will help Mr. Nuss and OSSD get the additional support they need. If the Committee and/or Administration have any questions, or if I can assist in any way, I remain available at any time, Central or Pacific.