

**DISABILITY SUPPORT AND ACCOMMODATIONS**

**CALIFORNIA STATE UNIVERSITY,  
FULLERTON**

**Report Number 02-35  
September 30, 2002**

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## **ABBREVIATIONS**

AAES	Academic Affairs Educational Support
AB	Assembly Bill
ADA	Americans with Disabilities Act
BA	Business Affairs
BP	Business Policy
CFR	Code of Federal Regulations
CO	Chancellor's Office
CSU	California State University
CSUF	California State University, Fullerton
CSU Fullerton	California State University, Fullerton
DSA	Disability Support and Accommodations
DSS	Disabled Student Services
EE	Extended Education
EO	Executive Order
SAM	State Administrative Manual
TAP	Titan Accommodation Program
UC	University of California

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## INTRODUCTION

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### PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of the disability support and accommodations (DSA) program and to determine the adequacy of controls over the related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit, specific goals included making a determination as to whether:

- ▶ Administration and management of the DSA program provide effective internal control; clear lines of organizational authority; delegations of authority; formation of an Advisory Committee on Services to Students with Disabilities; and documented policies and procedures.
- ▶ The adequacy of and satisfaction with the DSA program are consistently monitored and assessed.
- ▶ Campus notification and grievance processes ensure appropriate compliance with regulatory requirements and timely and adequate resolution of noted disability related issues.
- ▶ Persons and campus areas providing disabled student services possess the necessary qualifications and are appropriately trained and aware of their roles and responsibilities.
- ▶ Reasonable access and accommodations are provided to applicants and employees in compliance with Title I of the Americans with Disabilities Act (ADA), and student disability services comply with state law and California State University (CSU) and campus policies.
- ▶ Verification of disability is timely and adequately performed, and appropriate documentation is provided in compliance with CSU and campus policies.
- ▶ Disability records and information are properly maintained, safeguarded, and retained in accordance with state and federal regulations and CSU policy.
- ▶ Campus programs, services, and activities are readily accessible to all persons, and adaptive aids and other equipment are properly maintained and safeguarded.
- ▶ Campus disaster plans include evacuation procedures for disabled persons.
- ▶ Budgeting procedures adequately address program funding and ensure effective accounting and management control, and grant funds are administered in compliance with sponsor agreements.
- ▶ Chargebacks for disability support services are complete, accurate, valued properly, and processed timely, and credit is received.

## SCOPE AND METHODOLOGY

This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. July 2000 to March 2002 was the primary period of review.

We focused primarily upon internal administrative, compliance, and operational controls over the management of the DSA program. Specifically, we reviewed and tested policies, procedures, and processes for:

- ▶ Monitoring the quality and effectiveness of campus DSA services.
- ▶ Soliciting and resolving student complaints and grievances relating to programmatic, physical, and other accessibility issues.
- ▶ Hiring DSA program staff and campus-wide training practices.
- ▶ Providing reasonable access and accommodations to applicants and employees.
- ▶ Verifying disabilities and providing (or declining) student disability support services.
- ▶ Maintaining and protecting disability information, including data in automated systems.
- ▶ Providing programs, services, and activities that are readily accessible to disabled individuals.
- ▶ Administering program and grant funds for disability support and other related services.
- ▶ Authorizing and processing expenditures of program funds that include, but are not limited to, grant awards, miscellaneous revenues, and petty cash.
- ▶ Valuing, processing, and collecting chargebacks for DSA services provided to self-supporting operations.
- ▶ Recording, safeguarding, and maintaining inventory for adaptive aids and equipment.

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## BACKGROUND

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 1999, the Board of Trustees, at its January 2002 meeting, directed that *Disability Support and Accommodations* be reviewed.

The proposed scope of the audit as presented in Attachment B, Audit Item 2 of the January 29-30, 2002, meeting of the Committee on Audit stated that the review would include all CSU programs for disabled employees, students, and visitors including accessibility of facilities, provision of enabling supportive services, and use of adaptive technologies. Potential impacts include excessive costs, adverse publicity, inadequate accommodations and services, legal liabilities, and regulatory fines and sanctions. A related audit, *Handicapped Access*, was previously audited in 1988.

Beginning in the early 1970s, both the federal government and the state of California adopted laws that had far-reaching effects on improving services to students with disabilities and on the availability of these services at the postsecondary level. In 1973, Congress adopted the Federal Rehabilitation Act ensuring equal opportunity for persons with disabilities in the fields of employment and education and prohibiting discrimination on the basis of disability by any agency, including educational institutions that receive federal funds. In June 1977, the federal government issued regulations implementing Section 504 of the Rehabilitation Act of 1973. In response to Section 504 regulations, CSU campuses prepared self-evaluations that identified steps needed to ensure that students with disabilities had equal access to educational opportunities. In March 1980 and in response to the 1979 Budget Act, CSU also developed a policy statement that formalized the objectives of the Disabled Students Program to increase the enrollment of students with disabilities in the total student population and to facilitate their access to all educational programs. The *Policy for the Provision of Services to Students with Disabilities* detailed program goals and objectives, definitions of disabilities, and support services to be offered. The policy became the basis from which campus programs were developed and justified enrollment and funding requests. In 1980, the CSU Systemwide Advisory Committee on Services to Students with Disabilities was also established.

In 1989, the CSU revised the 1980 policy statement and incorporated disability services identified in Assembly Bill (AB) 746 into the new *Policy for the Provision of Services to Students with Disabilities*. In 1990, the federal government reinforced its commitment to individuals with disabilities by enacting the ADA. The ADA reaffirmed Section 504 of the Rehabilitation Act of 1973 regulations and extended the discrimination prohibition beyond the campus to businesses and organizations that did not receive federal funds. Additionally, the ADA detailed additional criteria in the areas of employment, new construction or renovation, transportation, and telecommunications. The ADA also required the appointment of an ADA coordinator and the development of a self-evaluation and transition plan to itemize compliance steps.

In November 1995, the Bureau of State Audits issued a report, *CSU and UC: Campuses Generally Provide Access for Students with Disabilities*, including four CSU and two University of California (UC) campuses. The report noted that overall, the chancellor's office (CO) of the CSU had developed adequate policies requiring respective campuses to comply with provisions of the ADA; all four campuses had developed adequate guidelines to meet the needs of, and provide access to, their students with disabilities; and students at all four campuses indicated a high level of satisfaction with services provided by their respective campuses. Based on the audit results, the Bureau of State Audits recommended that the CO increase campus awareness of ADA requirements by instructing its campuses to provide training classes or seminars for faculty and staff, and address conditions and remove barriers that may deny access to its students. The CO concurred with the findings and most of the recommendations in the report. Disabled student enrollment at the CSU has grown from 3,760 to 9,699 students (a 158% increase) from fall 1980 to fall 2001. Additionally, the number of students by disability category (visual limitation, communication disability, deafness, mobility limitation, learning disability, and other functional

limitations) changed dramatically reflecting a growth of students with certain disabilities seeking services from campus disability support services programs. Most notably, the number of students with specific learning disabilities increased from 124 in fall 1980 (3.3% of students served) to 4,078 (42% of students served) in fall 2001.

Throughout this report, we will refer to the program as disability support and accommodations (DSA). At California State University, Fullerton (CSU Fullerton), the disabled student services (DSS) department, the ADA compliance officer, programmatic managers, and other responsible individuals administer the DSA program.

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## **OPINION**

We visited the CSU Fullerton campus from April 8, 2002, through May 6, 2002, and audited the procedures in effect at that time.

In our opinion, the administration and management of the DSA program provided reasonable assurance that CSU Fullerton was in compliance with applicable regulations, CSU policies, and other directives. Through coordinated efforts, the campus demonstrated commitment to disabled employees, students, and visitors by providing signage, parking, and telephones in strategic and accessible locations on the campus; sponsoring the annual CSUF Special Games; and most recently, establishing the new Titan Accommodation Program (TAP). However, our review disclosed that certain components of the DSA program needed improvement. Specifically, the campus did not have an active Advisory Committee on Services to Students with Disabilities; and student accommodation information was not always afforded adequate protection. We also noted that the declination of certain student disability support services was not clearly documented in student files, and some campus websites were not fully accessible by all persons. Areas in need of improvement are referenced in the executive summary.

## **EXECUTIVE SUMMARY**

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **PROGRAM ADMINISTRATION [7]**

The campus did not have an Advisory Committee on Services to Students with Disabilities. Maintaining such a committee ensures that campus programs, services, and activities will be accessible to all individuals.

### **PERSONNEL QUALIFICATIONS AND TRAINING [7]**

The campus had not developed and documented an Americans with Disabilities Act (ADA) ongoing training plan for existing faculty, staff, and other individuals that may work with disabled persons. An effective training plan helps ensure compliance with federal, state, and California State University (CSU) policies.

### **DISABILITY VERIFICATION AND PROVISION OF SUPPORT [8]**

#### **PROTECTION OF STUDENT ACCOMMODATION INFORMATION [8]**

Student accommodation information was not afforded adequate protection from unauthorized disclosure. Adequate control over accommodation information reduces the risk of unauthorized disclosure of personal information and campus liability due to inappropriate activities.

#### **DECLINATION OF STUDENT DISABILITY SUPPORT SERVICES [9]**

The reason for declination of learning disability support services, where the campus denies a request for services or accommodations, was not always clearly documented in student files. Adequate documentation of the reason for a denial of disability support services reduces the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **PROGRAM AND PHYSICAL ACCESSIBILITY [10]**

#### **PARKING FOR DISABLED PERSONS [10]**

Parking provisions for disabled persons were not formally approved by the appropriate state agency. Adequate control over parking for disabled persons reduces the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **DISASTER EVACUATION TRAINING [11]**

Disaster evacuation training for disabled persons needed improvement. Periodic training on disaster evacuation procedures reduces the risk of injury and potential liability to the campus.

### **WEB ACCESSIBILITY [12]**

Websites for four campus programs (housing and residential life, library, student union, college of extended education) were not fully accessible by all persons. In addition, roles and responsibilities for ensuring that campus websites were fully accessible by all persons were not clearly defined in the campus' World Wide Web policy. Providing sufficient access to campus programs, services, activities, and communications reduces the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **FISCAL ADMINISTRATION [13]**

Disabled Student Services (DSS) did not adequately follow up on assistive equipment that was loaned to students. Sufficient controls over equipment reduce exposure to loss and/or misuse of state property.

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## **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

### **PROGRAM ADMINISTRATION**

The campus did not have an Advisory Committee on Services to Students with Disabilities.

California State University (CSU) directive Academic Affairs Educational Support (AAES) 89-07/Business Policy (BP) 89-08, *Policy for the Provision of Services to Students with Disabilities*, dated January 9, 1989, states that each campus shall establish an Advisory Committee on Services to Students with Disabilities.

The disabled student services (DSS) director acknowledged that an Advisory Committee on Services to Students with Disabilities had not been established because the campus felt that he was sufficiently consulted when Americans with Disabilities Act (ADA)-related issues were brought to the campus' attention. The director also stated that the newly established Titan Accommodation Program (TAP), which is a partnership between several campus divisions and cost centers, will further address ADA accommodation issues and will be administered by a committee that will comply with CSU policy.

Failure to maintain an Advisory Committee on Services to Students with Disabilities increases the risk that campus programs, services, and activities will not be fully accessible to all individuals.

#### **Recommendation 1**

We recommend that the campus establish an Advisory Committee on Services to Students with Disabilities.

#### **Campus Response**

The Titan Accommodation Program (TAP) Committee commenced regular meetings in October 2002. The TAP Committee will be entirely dedicated to addressing the needs and concerns of persons with disabilities, and be comprised of a broad representation of campus constituents and administration leaders. The TAP Committee chair, or co-chairs, will report to their respective division vice president(s).

### **PERSONNEL QUALIFICATIONS AND TRAINING**

The campus had not developed and documented an Americans with Disabilities Act (ADA) ongoing training plan for existing faculty, staff, and other individuals that may work with disabled persons.

The Bureau of State Audits report, *CSU and UC: Campuses Generally Provide Access for Students with Disabilities*, dated November 24, 1995, states that to increase campus awareness of ADA requirements, the chancellor's office of the CSU should instruct its campuses to provide training classes or seminars for faculty and staff.

Although the campus had not documented a training plan, the DSS director stated that efforts were made to provide faculty and staff with useful information for working with persons with disabilities and that all new employees attended an orientation/training which included information on disability services and the ADA. He also stated that due to the increasing number of part-time faculty and the staggered work hours that extended into the evening, the campus had not been able to systematically address this issue. The DSS director acknowledged the importance of this issue and stated that plans are in place to update, revise, and redistribute the faculty and staff handbook on college students with disabilities and develop a comprehensive training plan that includes faculty, staff, and other individuals who work with disabled persons.

Not maintaining an effective training plan increases the risk of noncompliance with federal, state, and CSU policies.

### **Recommendation 2**

We recommend that the campus develop an ADA training plan for faculty, staff, and other persons to ensure sufficient understanding of student disability issues and campus-related support and accommodation services.

### **Campus Response**

The campus is very proud of its comprehensive new employee training programs that not only provide all faculty and staff, both full and part-time, with an understanding of services and programs for persons with disabilities, but also provides training in the safe evacuation of persons with disabilities. This ongoing training will be augmented with an annual e-mail Bulletin Board notice each October, including the 2002 calendar year, to all full and part-time faculty and staff highlighting ADA requirements, programs, and changes. Additionally, the Faculty/Staff Handbook will be continuously updated, republished, and discussed at standing department meetings.

## **DISABILITY VERIFICATION AND PROVISION OF SUPPORT**

### **PROTECTION OF STUDENT ACCOMMODATION INFORMATION**

Student accommodation information was not afforded adequate protection from unauthorized disclosure.

We noted that testing forms, which included the student's name and approved accommodations, were posted outside each testing room on examination date.

CSU directive AAES 89-07/BP 89-08, *Policy for the Provision of Services to Students with Disabilities*, dated January 9, 1989, states that each campus shall maintain confidential records identifying its students with professionally verified disabilities.

Civil Code §1798.1(c), *Information Practices Act of 1977*, states that in order to protect the privacy of individuals, it is necessary that the maintenance and dissemination of personal information be subject to strict limits.

The DSS director stated that testing forms were placed outside each testing room to remind the proctors of the time requirement for the tests to be completed.

Inadequate control over accommodation information increases the risk of unauthorized disclosure of personal information and campus liability due to inappropriate activities.

### **Recommendation 3**

We recommend that the campus strengthen procedures to ensure that testing forms are appropriately secured and protected from unauthorized access.

### **Campus Response**

The campus continuously handles hundreds of confidential forms and documents pertaining to disabled students and personnel. Concern over the control of such a large volume of confidential information is always present. We are very pleased with the level of control found by the auditors regarding how well information is being controlled and have further reduced the risk of unauthorized access to accommodation information by removing testing forms from the DSS testing room area.

## **DECLINATION OF STUDENT DISABILITY SUPPORT SERVICES**

The reason for declination of learning disability support services, where the campus denies a request for services or accommodations, was not always clearly documented in student files.

We noted that in 7 of 15 student files reviewed, the campus did not document the reasons for declining learning disability support services.

CSU directive AAES 89-07/BP 89-08, *Policy for the Provision of Services to Students with Disabilities*, dated January 9, 1989, states that students with learning disabilities shall be provided diagnostic assessment, including both individual and group assessment, necessary to determine the functional or educational levels or to certify specific disabilities.

The DSS director explained that verbal notification to students was always performed; however, counselors did not always document the declination of requested services or accommodations in the students' files. He stated that an official form is being created to address the need to clearly document the declination of an application for DSS support services.

Inadequate documentation of the reason for a denial of disability support services increases the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **Recommendation 4**

We recommend that the campus develop and document written policies and procedures for the declination of disability support services provided by DSS.

### **Campus Response**

In accordance with CSU policy, the campus may continue to provide all students with potential or recognized learning disabilities a diagnostic assessment, as appropriate or needed. Regrettably, on occasion the assessment does not demonstrate a need for support. In order to more readily ascertain the specific reason(s) for declination of support, the campus has added a new form, to the existing written assessment procedures, which includes a written explanation of why services were declined. This form will also be used to verify the qualifying disability for all students served by disabled student services.

## **PROGRAM AND PHYSICAL ACCESSIBILITY**

### **PARKING FOR DISABLED PERSONS**

Parking provisions for disabled persons were not formally approved by the appropriate state agency.

We noted that the parking provision for disabled persons included stalls that did not always meet the state government code and was not formally approved by the State of California Department of General Services, Division of the State Architect.

State University Administrative Manual §9232 indicates that for all new construction, alteration, or remodeling projects, the CSU must be in compliance with access requirements. Compliance must be certified by the State of California Department of General Services, Division of the State Architect.

The DSS director acknowledged that the master plan for disabled persons parking was developed to provide the maximum number of stalls in demand by disabled persons versus meeting the state government code. He further stated that the campus had discussed this approach with the responsible state agency and verbal approval for the exception was given. In addition, the director stated that the campus requested written approval for the disabled person parking plan from the responsible field office; however, despite many attempts by the campus, an approval was never received.

Inadequate evidence of compliance over parking for disabled persons increases the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **Recommendation 5**

We recommend that the campus obtain appropriate approval from the State of California Department of General Services, Division of the State Architect for the provision of disabled person parking on the campus.

### **Campus Response**

The campus consistently obtains and will continue to seek appropriate project approvals, in writing, from the State of California Department of General Services, Division of the State Architect for the provision of adequate disabled person parking on the campus as required by State University Administrative Manual 9232. Their approval is evidenced by the Division of the State Architect's stamp on each set of plans for new construction, alteration, or remodeling projects, including parking projects, and includes the path of travel to the project site from disabled person parking.

To facilitate Division of the State Architect approvals in the future and to help optimize the accommodation of disabled persons' needs overall, the campus has drafted a campuswide plan called "Campuswide Disabled Person Parking Access and Paths of Travel Plan." That plan was submitted to the Division of the State Architect for their input, and the campus has received the Division of the State Architect's written comments on it. The campus will revise the plan and resubmit a fully conforming plan to the Division of the State Architect by March 1, 2003. Once Division of the State Architect approval is obtained, the plan will be implemented.

It is important to stress that the campuswide plan is a self-imposed assurance tool that aids compliance planning and will facilitate Division of the State Architect approval of future campus building projects, but is not stipulated as a required practice in Title 24 or any other regulation.

### **DISASTER EVACUATION TRAINING**

Disaster evacuation training for disabled persons needed improvement.

We noted that:

- ▶ Certain building marshals had not been provided disaster evacuation training for disabled persons in over two years.
- ▶ One of two building marshals interviewed was unfamiliar with the use of the evacuation chair in the Langsdorf Building while the other building marshal was not aware of the evacuation chair in University Hall.

The Bureau of State Audits report, *CSU and UC: Campuses Generally Provide Access for Students with Disabilities*, dated November 24, 1995, states that to increase campus awareness of ADA requirements, the chancellor's office of the CSU should instruct its campuses to provide training classes or seminars and require mandatory attendance for faculty and staff.

The environmental health and instructional safety officer stated that due to time and resource constraints, training had not been performed in a few years.

Insufficient training on disaster evacuation procedures increases the risk of injury and potential liability to the campus.

### **Recommendation 6**

We recommend that the campus establish and document regular building marshal training sessions on the emergency evacuation of disabled individuals that includes, but is not limited to, the use of evacuation chairs.

### **Campus Response**

The campus provides every new employee with safety training that includes assistance for disabled persons. In addition, building marshals are periodically provided training specific to the use of evacuation equipment. Training sessions were conducted for all building marshals during August and September 2002. Going forward, the campus will make certain that all new building marshals immediately receive the proper training and all existing marshals routinely receive ongoing refresher training.

## **WEB ACCESSIBILITY**

Websites for four campus programs (housing and residential life, library, student union, college of extended education) were not fully accessible by all persons. In addition, roles and responsibilities for ensuring that campus websites were fully accessible by all persons were not clearly defined in the campus' World Wide Web policy.

Code of Federal Regulations (CFR) Title 28, Part 35, *Nondiscrimination on the Basis of Disability in State and Local Government Service*, §35.160(a) and §35.160(b)(1), effective January 26, 1992, states that a public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others, and furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity, respectively.

The director of internet technologies stated that due to a division of responsibility for campus administrative websites and nonadministrative websites hosted by faculty and other areas, the campus was unable to maintain effective compliance with accessibility standards. He acknowledged that the campus' World Wide Web policy does not indicate roles and responsibilities for ensuring accessible websites and indicated this would be discussed at the presidential web presence portal committee that meets on a monthly basis.

Insufficient access to campus programs, services, activities, and communications increases the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

### **Recommendation 7**

We recommend that the campus:

- a. Define and document responsibilities to ensure websites are fully accessible to all persons.
- b. Review and correct the accessibility issues noted in the housing and residential life, library, student union, and college of extended education websites.

### **Campus Response**

Web pages created by the university's web development team are checked for access by disabled persons as a part of the development process. Web pages are not loaded to the production web site unless they pass Bobby Level 1 with zero exceptions. This procedure is documented in the web site developer's guide.

To ensure that web pages have not been put into production from other sources without being made fully accessible, effective immediately as part of the official charter the university's web team, the entire web server will be scanned once each month and produce a list of all web pages which fail to pass Bobby Level 1. In the event a university administrative web site is not fully compliant, the developer of the web site will be provided a copy of the report for every page that fails. If a page is not corrected by the next monthly scan, the university administrator responsible for that area will be notified. The second month, that person's immediate supervisor will be notified (and so on) until the page is corrected. Logs of these scans will be kept for one calendar year.

Additionally, the campus has made all four of the sites mentioned in the audit report fully accessible without translation assistance from support personnel.

It is important to note that disabled student and personnel support has been continuously available and provided to ensure those with disabilities can access information on all campus-hosted sites. As such, while sites on occasion may not be developed to fully accommodate the ever-improving array of adapted software, the numerous disabled student services and human resource personnel dedicated to the needs and welfare of disabled persons can make information on all sites accessible.

## **FISCAL ADMINISTRATION**

Disabled Student Services (DSS) did not adequately follow up on assistive equipment that was loaned to students.

Although the department maintained a database of all assistive equipment loaned to students, our review of department records revealed that various items (e.g., hand-held tape recorders) that were checked out by students in the prior two calendar years had not been returned.

SAM §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include a system of authorization and record-keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The DSS director stated that current practice was to place a hold on the student's record if equipment that was due and was not returned by the next academic year, and until recently, he was unaware that this policy did not ensure more timely return of the equipment. The director further stated that he recently discussed this issue at a staff meeting and that plans are underway to implement more effective equipment controls.

Insufficient controls over equipment increase exposure to loss and/or misuse of state property.

### **Recommendation 8**

We recommend that the campus strengthen controls over assistive equipment through effective monitoring and documentation of the loan process.

### **Campus Response**

At the end of each semester, the campus will use the existing log to confirm students in possession of assistive equipment continue to be actively enrolled and in need of the equipment. In the event a student no longer qualifies for the use of the equipment, Disabled Student Services will ask for the return of the equipment by a specified date and if not returned, will process a 'hold' on their records. At present, all outstanding equipment has been confirmed as in the possession of an active student.

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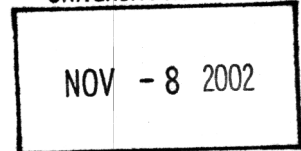
## **APPENDIX A: PERSONNEL CONTACTED**

<u>Name</u>	<u>Title</u>
Milton A. Gordon	President
Peggy Barlow	Staff, Financial Aid
Jay Bond	Associate Vice President of Facilities Management
Kurt Borsting	Director, Titan Student Union
Elizabeth Buchanan	Office Manager, Disabled Student Services
Caroline Cosgrove	Coordinator of Disabled Employees Program
Kathryn Crawford	Staff, College of Business and Economics
Amir Dabirian	Director of Internet Technologies
Debra Fletcher	Learning Disability Specialist, Disabled Student Services
Quentin Frasier	Emergency Preparedness Coordinator, Public Safety
Rosamaria Gomez-Amaro	Director of Office of Diversity and Equity Programs
Willie J. Hagan	Vice President of Administration
Elizabeth Housewright	Associate University Librarian
Melody Johnston	Associate Dean of University Extended Education Services
J. Douglas Liverpool	Counseling and Learning Disability Coordinator, Disabled Student Services
Maria Mezhinsky	Admissions and Records Data Coordinator
Paul Miller	Director, Disabled Student Services
Kandy Mink	Associate Vice President of Student Affairs
Sherri L. Newcomb	Chief Financial Officer
Harry Norman	Dean of University Extended Education Services
Robert L. Palmer	Vice President, Student Affairs
Jim Powell	Web Team Leader
Robert Sage	Instruction and Information Services Coordinator
Jeff Senge	Coordinator of Information and Computer Access Program
Darlene Stevenson	Director, Housing and Residential Life
Lisa Thies	Support Services Coordinator
Alex Tzoumas	Director of Internal Audit
Colleen Wilkins	Environmental Health and Instructional Safety Officer



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RECEIVED  
UNIVERSITY AUDITOR



THE CALIFORNIA STATE  
UNIVERSITY

Larry Mandel  
University Auditor

**DATE:** November 4, 2002

**FROM:** Milton A. Gordon  
President *may*

**SUBJECT:** Response for Disability Support & Accommodations Audit

I am pleased to forward California State University, Fullerton's official corrective action plans to enhance the delivery of our disability support and accommodation program and strengthen campus compliance with relevant government guidance, as recommended in the Incomplete Draft of the CSU Disability Support and Accommodations Audit Report, No. 02-35.

Once again, we would like to thank the University Auditor and his staff for conducting the audit in a professional manner and identifying meaningful ways to improve our success.

The action plans have been entered in an electronic file and placed on the enclosed diskette/file for your convenience. Should you have questions, please contact Alex Tzoumas, Internal Audit Director at 714-278-5760 or [atzoumas@fullerton.edu](mailto:atzoumas@fullerton.edu).

Diskette Attachment

Willie J. Hagan, Vice President for Administration  
Robert L. Palmer, Vice President for Student Affairs  
Alex Tzoumas, Director Internal Audit

**CALIFORNIA STATE UNIVERSITY,  
FULLERTON**

**DISABILITY SUPPORT AND ACCOMMODATIONS  
AUDIT REPORT NO. 02-35**

**PROGRAM ADMINISTRATION**

**Recommendation 1**

We recommend that the campus establish an Advisory Committee on Services to Students with Disabilities.

**Campus Response**

The Titan Accommodation Program (TAP) Committee commenced regular meetings in October 2002. The TAP Committee will be entirely dedicated to addressing the needs and concerns of persons with disabilities, and be comprised of a broad representation of campus constituents and administration leaders. The TAP Committee Chair, or co-Chairs, will report to their respective division vice president(s).

**PERSONNEL QUALIFICATIONS AND TRAINING**

**Recommendation 2**

We recommend that the campus develop an ADA training plan for faculty, staff, and other persons to ensure sufficient understanding of student disability issues and campus-related support and accommodation services.

**Campus Response**

The campus is very proud of its comprehensive new employee training programs that not only provide all faculty and staff, both full and part-time, with an understanding of services and programs for persons with disabilities, but also provides training in the safe evacuation of persons with disabilities. This ongoing training will be augmented with an annual e-mail Bulletin Board notice each October, including the 2002 calendar year, to all full and part-time faculty and staff highlighting ADA requirements, programs and changes. Additionally, the Faculty/Staff Handbook will be continuously updated, republished, and discussed at standing department meetings.

## **DISABILITY VERIFICATION AND PROVISION OF SUPPORT**

### **PROTECTION OF STUDENT ACCOMMODATION INFORMATION**

#### **Recommendation 3**

We recommend that the campus strengthen procedures to ensure that testing forms are appropriately secured and protected from unauthorized access.

#### **Campus Response**

The Campus continuously handles hundreds of confidential forms and documents pertaining to disabled students and personnel. Concern over the control of such a large volume of confidential information is always present. We are very pleased with the level of control found by the auditors regarding how well information is being controlled and have further reduced the risk of unauthorized access to accommodation information by removing testing forms from the DSS testing room area.

### **DECLINATION OF STUDENT DISABILITY SUPPORT SERVICES**

#### **Recommendation 4**

We recommend that the campus develop and document written policies and procedures for the declination of disability support services provided by DSS.

#### **Campus Response**

In accordance with CSU policy, the campus may continue to provide all students with potential or recognized learning disabilities a diagnostic assessment, as appropriate or needed. Regrettably, on occasion the assessment does not demonstrate a need for support. In order to more readily ascertain the specific reason(s) for declination of support, the campus has added a new form, to the existing written assessment procedures, which includes a written explanation of why services were declined. This form will also be used to verify the qualifying disability for all students served by Disabled Student Services.

## **PROGRAM AND PHYSICAL ACCESSIBILITY**

### **PARKING FOR DISABLED PERSONS**

#### **Recommendation 5**

We recommend that the campus obtain appropriate approval from the State of California Department of General Services, Division of the State Architect for the provision of disabled person parking on the campus.

### **Campus Response**

The campus consistently obtains and will continue to seek appropriate project approvals, in writing, from the State of California Department of General Services, Division of the State Architect (DSA) for the provision of adequate disabled person parking on the campus as required by State University Administrative Manual 9232. Their approval is evidenced by DSA's stamp on each set of plans for new construction, alteration or remodeling projects, including parking projects, and includes the path of travel to the project site from disabled person parking.

To facilitate DSA approvals in the future and to help optimize the accommodation of disabled persons' needs overall, the campus has drafted a campuswide plan called "Campuswide Disabled Person Parking Access and Paths of Travel Plan". That plan was submitted to DSA for their input, and the campus has received DSA's written comments on it. The campus will revise the plan and resubmit a fully conforming plan to DSA by March 1, 2003. Once DSA approval is obtained, the plan will be implemented.

It is important to stress that the campuswide plan is a self-imposed assurance tool that aids compliance planning and will facilitate DSA approval of future campus building projects, but is not stipulated as a required practice in Title 24 or any other regulation.

## **DISASTER EVACUATION TRAINING**

### **Recommendation 6**

We recommend that the campus establish and document regular building marshal training sessions on the emergency evacuation of disabled individuals that includes, but is not limited to, the use of evacuation chairs.

### **Campus Response**

The campus provides every new employee with safety training that includes assistance for disabled persons. In addition, building marshals are periodically provided training specific to the use of evacuation equipment. Training sessions were conducted for all building marshals during August and September 2002. Going forward, the campus will make certain that all new building marshals immediately receive the proper training and all existing marshals routinely receive ongoing refresher training.

## **WEB ACCESSIBILITY**

### **Recommendation 7**

We recommend that the campus:

- a. Define and document responsibilities to ensure websites are fully accessible to all persons.
- b. Review and correct the accessibility issues noted in the housing and residential life, library, student union, and college of extended education websites.

### **Campus Response**

Web pages created by the University's web development team are checked for access by disabled persons as a part of the development process. Web pages are not loaded to the production web site unless they pass Bobby Level 1 with zero exceptions. This procedure is documented in the web site developer's guide.

To ensure that web pages have not been put into production from other sources without being made fully accessible, effective immediately as part of the official charter the University's web team, the entire web server will be scanned once each month and produce a list of all web pages which fail to pass Bobby Level 1. In the event a University administrative web site is not fully compliant, the developer of the web site will be provided a copy of the report for every page that fails. If a page is not corrected by the next monthly scan, the University administrator responsible for that area will be notified. The second month, that person's immediate supervisor will be notified (and so on) until the page is corrected. Logs of these scans will be kept for one calendar year.

Additionally, the campus has made all four of the sites mentioned in the audit report fully accessible without translation assistance from support personnel.

It is important to note that disabled student and personnel support has been continuously available and provided to ensure those with disabilities can access information on all campus hosted sites. As such, while sites on occasion may not be developed to fully accommodate the ever-improving array of adapted software, the numerous Disabled Student Services and Human Resource personnel dedicated to the needs and welfare of disabled persons can make information on all sites accessible.

## **FISCAL ADMINISTRATION**

### **Recommendation 8**

We recommend that the campus strengthen controls over assistive equipment through effective monitoring and documentation of the loan process.

### **Campus Response**

At the end of each semester, the campus will use the existing log to confirm students in possession of assistive equipment continue to be actively enrolled and in need of the equipment. In the event a student no longer qualifies for the use of the equipment, Disabled Student Services will ask for the return of the equipment by a specified date and if not returned, will process a 'hold' on their records. At present, all outstanding equipment has been confirmed as in the possession of an active student.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD

December 9, 2002

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

FRESNO

TO: Mr. Larry Mandel  
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed  
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 02-35 on *Disability Support and Accommodations*, California State University, Fullerton

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of December 9, 2002, I accept the response as submitted with the draft final report on *Disability Support and Accommodations*, California State University, Fullerton.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/amd

SACRAMENTO

Enclosure

SAN BERNARDINO

SAN DIEGO

cc: Dr. Milton A. Gordon, President  
Mr. Alex Tzoumas, Director of Internal Audit

SAN FRANCISCO

SAN JOSE

SAN JIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS