

**DISABILITY SUPPORT AND ACCOMMODATIONS**

**SAN DIEGO STATE UNIVERSITY**

**Report Number 02-37**

**November 5, 2002**

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**Members, Committee on Audit**

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Kyriakos Tsakopoulos, Vice Chair  
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## **ABBREVIATIONS**

AB	Assembly Bill
ADA	Americans with Disabilities Act
CO	Chancellor's Office
CSU	California State University
DSA	Disability Support and Accommodations
DSS	Disabled Student Services
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 May 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 performed 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 San Diego State University, the disabled student services department, the ADA compliance officer, programmatic managers, and other responsible individuals administer the DSA program.

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## **OPINION**

We visited the San Diego State University campus from June 10, 2002, through July 12, 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 San Diego State University 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, telephones, and maps in strategic and accessible locations on the campus. However, our review disclosed that certain components of the DSA program needed improvement. Specifically, the campus student advisory committee's practices did not ensure adequate representation by campus constituents, regular meetings, and effective circulation of meeting minutes; and 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 [6]**

The Disabled Student Services (DSS) Advisory Committee's practices did not ensure adequate representation by campus constituents, regular meetings and attendance by committee members, and effective circulation of meeting minutes. Effective DSS Advisory Committee practices and control reduce the risk that campus programs, services, and activities will not be fully accessible to all individuals.

### **PROGRAM AND PHYSICAL ACCESSIBILITY [6]**

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

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

### **PROGRAM ADMINISTRATION**

The Disabled Student Services (DSS) Advisory Committee's practices did not ensure adequate representation by campus constituents, regular meetings and attendance by committee members, and effective circulation of meeting minutes.

California State University (CSU) directive Academic Affairs Educational Support 89-07/Business Policy 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 DSS director stated that due to the transition of leadership within the department, a DSS Advisory Committee meeting had not been held in two years.

Failure to maintain an effective DSS Advisory Committee increases the risk that campus programs, services, and activities will not be fully accessible to all individuals.

#### **Recommendation 1**

We recommend that the campus:

- a. Appoint students and members from campus departments to the DSS Advisory Committee.
- b. Ensure that regular meetings are held.
- c. Ensure that the results of such meetings are circulated to appropriate personnel.

#### **Campus Response**

We concur. The campus will continue to ensure adequate representation by appointing students, faculty, administrators, and staff to the DSS Advisory Committee. Meetings will be held, as needed, and meeting minutes will be circulated. The target date for resolution is March 31, 2003.

### **PROGRAM AND PHYSICAL ACCESSIBILITY**

Websites for five campus programs (housing and residential life, library, college of extended education, student union, and college of education) were not accessible by all persons. In addition, roles and responsibilities for ensuring that campus websites were accessible by all persons were not clearly defined.

Code of Federal Regulations, 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, state 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 campus web designers for the noted areas explained that they have attended a few web accessibility workshops and that the campus is in the initial stages of addressing this issue. They agreed that the campus should assign accountability for this area and develop a plan to review existing and new websites for accessibility.

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

### **Recommendation 2**

We recommend that the campus:

- a. Define and document responsibilities to ensure that websites are accessible to all persons.
- b. Review and correct the accessibility issues in the websites cited above.

### **Campus Response**

We concur:

- a. The campus will define and document responsibilities to ensure compliance with website accessibility standards. Responsibilities will be documented by May 31, 2003.
- b. The five campus program websites (housing and residential life, library, college of extended education, student union, and college of education) will be reviewed. Accessibility issues will be corrected by May 31, 2003.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Stephen L. Weber	President
Elizabeth Bacon	Disability Program Coordinator, Office of Diversity and Equity
Sue Blair	Director, Center for Human Resources
Cherie Bloodworth	Coordinator of Special Sessions, College of Extended Studies
Bill Boyd	Associate Vice President, Enrollment Services
Bea Briggs	Facilities Coordinator, Library and Information Access
Valerie Carter	Tax and Audit Coordinator, Business Information Management
Cindy Chie	Graphic Designer, Academic Affairs
Dan Cornthwaite	Executive Director, Associated Students, Inc.
Cheryl Fisher	Administrator, Office of Diversity and Equity
Ellene Gibbs	Director, Business Information Management
Joan Helfond	Assistant Director, Disabled Student Services
Helen Henry	Director, Library Administrative Operations
Laura Hudson	Information Technician, Library and Information Access
Pat Kroncke	Interim Director, Housing and Residential Life
Patricia Lozada-Santone	Assistant Dean of Student Affairs, College of Education
Keith Parks	Graphic Designer, Divisional Communications for Student Affairs
Cesar Portillo	Worker's Compensation Manager, Center for Human Resources
Mary Shojai	Director, Disabled Student Services
Susan Shuckett	Interim Director, Residential Education



*A Century Of Learning 1897-1997*  
THE PRESIDENT

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January 15, 2003

Mr. Larry Mandel  
University Auditor  
The California State University  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802



Dear Mr. Mandel

The following is San Diego State University's response to Report Number 02-37, *Disability Support and Accommodations*. For ease of reference, the report's recommendations have been included with our responses.

### **Recommendation 1**

We recommend that the campus:

- a. Appoint students and members from campus departments to the DSS Advisory Committee.
- b. Ensure that regular meetings are held.
- c. Ensure that the results of such meetings are circulated to appropriate personnel.

### **Campus Response**

We concur. The campus will continue to ensure adequate representation by appointing students, faculty, administrators, and staff to the DSS Advisory Committee. Meetings will be held, as needed, and meeting minutes will be circulated.

### **Recommendation 2**

We recommend that the campus

- a. Define and document responsibilities to ensure that websites are accessible to all persons.
- b. Review and correct the accessibility issues in the websites cited above.

Mr. Larry Mandel  
Page 2  
January 15, 2003

**Campus Response**

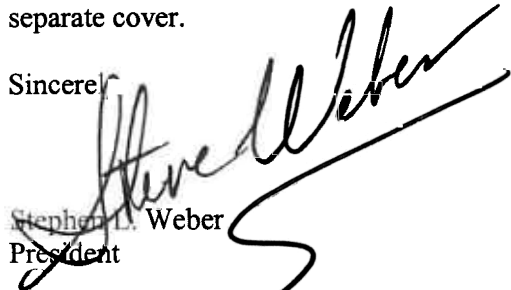
We concur.

The campus will define and document responsibilities to ensure compliance with website accessibility standards. Responsibilities will be documented by May 31, 2003.

- b. The five campus program websites (Housing and Residential Life, Library, College of Extended Studies, Associated Studies, and College of Education) will be reviewed. Accessibility issues will be corrected by May 31, 2003.

Documentation of policy and control changes relative to Recommendation will follow under separate cover.

Sincerely,



Stephen L. Weber  
President

SLW/jsh

Sally F. Roush, Vice President, Business and Financial Affairs  
Ellen J. Gibbs, Director, Business Information Management  
William D. Boyd, Associate Vice President, Enrollment Support  
Valerie J. Carter, Tax and Audit Coordinator

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD

February 6, 2003

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 02-37 on *Disability Support and Accommodations*, San Diego State University

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of February 6, 2003, I accept the response as submitted with the draft final report on *Disability Support and Accommodations*, San Diego State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/bh

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Dr. Stephen L. Weber, President  
Ellene J. Gibbs, Director, Business Information Management

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS