

DISABILITY SUPPORT AND ACCOMMODATIONS

**CALIFORNIA STATE UNIVERSITY,
NORTHRIDGE**

**Report Number 02-41
February 18, 2003**

Members, Committee on Audit

Shailesh J. Mehta, Chair
Kyriakos Tsakopoulos, Vice Chair
William Hauck Dee Dee Myers
Erene S. Thomas Anthony M. Vitti

Staff

University Auditor: Larry Mandel
Audit Manager: Michelle Schlack
Senior Auditor: John Stegall

BOARD OF TRUSTEES

THE CALIFORNIA STATE UNIVERSITY

CONTENTS

INTRODUCTION

Purpose.....	1
Scope and Methodology	2
Background.....	2
Opinion	4
Executive Summary	5

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Program Administration.....	6
Program and Physical Accessibility.....	6
Fiscal Administration.....	7

APPENDICES

APPENDIX A:	Personnel Contacted
APPENDIX B:	Campus Response
APPENDIX C:	Chancellor's Acceptance

ABBREVIATIONS

AA	Academic Affairs
AAES	Academic Affairs Educational Support
AB	Assembly Bill
ADA	Americans with Disabilities Act
BP	Business Policy
CO	Chancellor's Office
COD	Center on Disabilities
CSU	California State University
CSUN	California State University, Northridge
DSA	Disability Support and Accommodations
SAM	State Administrative Manual
UC	University of California

INTRODUCTION

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.

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 California State University, Northridge (CSUN), students with disabilities resources, the center on disabilities, the ADA compliance officer, programmatic managers, and other responsible individuals administer the DSA program.

OPINION

We visited the CSUN campus from September 3, 2002, through September 30, 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 CSUN 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 accessible parking; incorporating accessibility requirements in new construction and renovation projects; obtaining disabled persons input during construction design and layout of office furnishings; and providing training workshops and seminars that include ADA accessibility and compliance requirements. 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 a web accessibility policy. 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 Campuswide Disabilities Issues Board had not met in the last academic year. Maintaining an advisory committee ensures that campus programs, services, and activities will be accessible to all individuals.

PROGRAM AND PHYSICAL ACCESSIBILITY [6]

The campus had not developed a web accessibility policy. Providing sufficient access to campus programs, services, activities, and communication reduces the risk of regulatory scrutiny, potential lawsuits, and negative publicity.

FISCAL ADMINISTRATION [7]

The center on disabilities (COD) had not established procedures to track assistive equipment that was purchased from endowment funds. Establishing control procedures for equipment reduces exposure to loss and/or misuse of state property.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PROGRAM ADMINISTRATION

The Campuswide Disabilities Issues Board had not met in the last academic year.

Academic Affairs (AA) 2002-35, *Policy for the Provision of Accommodations and Support Services to Students with Disabilities*, dated July 1, 2002, states that each campus shall establish an Advisory Committee on Services to Students with Disabilities. This policy is a restatement of 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, which required the establishment of a similar advisory committee for the period reviewed.

The Americans with Disabilities Act (ADA) coordinator stated that the responsibility to chair the Campuswide Disabilities Issues Board was delegated to him by the campus president in mid-2001; however, he did not assume these responsibilities until early 2002 due to other commitments.

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

Recommendation 1

We recommend that the campus implement monitoring controls to ensure that regular meetings of the Campuswide Disabilities Issues Board are held.

Campus Response

The Campuswide Disabilities Issues Board met on October 14, 2002, and March 3, 2003. The next meeting is scheduled for April 28, 2003. The campus ADA coordinator and director of equity and diversity is responsible for ensuring that regular meetings of the Board are held.

PROGRAM AND PHYSICAL ACCESSIBILITY

The campus had not developed a web accessibility policy.

State Administrative Manual (SAM) §20050 states that one symptom of a deficient internal control system is policy and procedural or operational manuals that are either not currently maintained or are nonexistent.

The ADA coordinator stated that prior to assuming his duties, the campus convened a committee to research the issue of web accessibility and that the committee drafted a web accessibility policy that was never approved by the campus.

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

Recommendation 2

We recommend that the campus finalize the web accessibility policy.

Campus Response

We concur. A revised web accessibility policy has been drafted. Approval and implementation of the policy will occur by April 30, 2003. The chief information officer is responsible for the corrective action.

FISCAL ADMINISTRATION

The center on disabilities (COD) had not established procedures to track assistive equipment that was purchased from endowment funds.

SAM §20050 states 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 asset, liabilities, revenues, and expenditures.

The associate director of COD stated that when restricted endowment funds are used for assistive equipment purchases, the California State University, Northridge Foundation retains the documentation and does not forward it to her department for inventory control purposes.

Insufficient control over assistive equipment increases exposure to loss and/or misuse of state property.

Recommendation 3

We recommend that the campus strengthen inventory controls over assistive equipment purchased with restricted endowment funds.

Campus Response

We concur. The asset management department will implement a special code in their inventory system to identify assistive equipment purchased with restricted endowment funds. This code will be implemented by July 1, 2003.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Jolene Koester	President
Tom Brown	Director, Physical Plant Management
Edward Carrol	Dean, College of Science and Mathematics
Mary Ann Cummins-Prager	Coordinator, Office of Students With Disabilities Resources
Susan Curzon	Dean, University Library
Colin Donahue	Director, Facilities Planning, Design and Construction
Joyce Feucht-Haviar	Dean, College of Extended Learning
Debra Hammond	Director, University Student Union
Jodi Johnson	Associate Director, Center on Disabilities
Howard Lutwak	University Internal Auditor
Angela McHugh	Accounts Receivable Supervisor
Jerry Nader	Manager, Academic Resources, College of Education
Gordon Nakawaga	Director, Office of Equity and Diversity and ADA Coordinator
Charlie Neff	Accounting Manager, Center on Disabilities
Ron Norton	Director, Environmental Health and Occupational Safety
Susan Parker	Associate Dean, University Library
Merri Pearson	Director, National Center on Disabilities
Terry Piper	Vice President for Student Affairs
Mohammad Qayoumi	Vice President, Administration and Finance and Chief Financial Officer
Harry Rizer	Director, Center on Disabilities
Adele Steele	Director, Career Center
Tim Trevan	Director, Residential Life and University Conference Center
Mike Weaver	Director, Finance and Academic Support, College of Extended Learning
Kurt Webb	Director, Information Technology Resources User Support Services
Mika Williamson	Manager, Compensation and Employment Programs
Eric Willis	System Administrator, University Library

Jolene Koester
President

March 26, 2003

RECEIVED
UNIVERSITY AUDITOR

MAR 28 2003

THE CALIFORNIA STATE
UNIVERSITY

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

Subject: Campus Response to Recommendations of Audit Report 02-41
Disability Support and Accommodations at California State University, Northridge

Dear Mr. Mandel:

I am forwarding the California State University, Northridge (CSUN) response to the recommendations of the audit, as requested in your letter of February 28, 2003. I have also included a copy of the responses in a Word document on the enclosed diskette.

We have read the report including the observations and recommendations, and we agree with them. CSUN has taken corrective action to implement all of the recommendations. In addition, by separate correspondence I will provide you with the applicable documents evidencing completion of our implementation process and corrective action for each recommendation.

Should there be questions regarding the contents of the response, they may be addressed to Howard Lutwak, CSUN Internal Auditor at (818) 677-7647.

We appreciate the recommendations to improve CSUN's systems of internal control.

Sincerely,



Jolene Koester
President

JK:mh

Enclosure

cc: Mo Qayoumi
Howard Lutwak

F:\USER\VP\GROUP\Audits\EXTERNAL\Disability Support 2003\Audit 02-41 Campus Response to Recommendations cover letter.doc

CALIFORNIA STATE UNIVERSITY
NORTHRIDGE

DISABILITY SUPPORT AND ACCOMMODATIONS
AUDIT REPORT NO. 02-41

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus implement monitoring controls to ensure that regular meetings of the Campuswide Disabilities Issues Board are held.

Campus Response

The Campus Wide Disabilities Board met on October 14, 2002 and March 3, 2003. The next meeting is scheduled for April 28, 2003. The campus ADA Coordinator and Director of Equity and Diversity is responsible for ensuring that regular meetings of the Board are held.

PROGRAM AND PHYSICAL ACCESSIBILITY

Recommendation 2

We recommend that the campus finalize the web accessibility policy.

Campus Response

We concur. A revised web accessibility policy has been drafted. Approval and implementation of the policy will occur by April 30, 2003. The Chief Information Officer is responsible for the corrective action.

FISCAL ADMINISTRATION

EQUIPMENT CONTROL

Recommendation 3

We recommend that the campus strengthen inventory controls over assistive equipment purchased with restricted endowment funds.

Campus Response

We concur. The Asset Management department will implement a special code in their inventory system to identify assistive equipment purchased with restricted endowment funds. This code will be implemented by July 1, 2003.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 18, 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 02-41 on *Disability Support and Accommodations*, California State University, Northridge

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of April 18, 2003, I accept the response as submitted with the draft final report on *Disability Support and Accommodations*, California State University, Northridge.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/ac

SACRAMENTO

Enclosure

SAN BERNARDINO

SAN DIEGO

cc: Dr. Jolene Koester, President

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS