

**CSU and UC:  
Campuses Generally  
Provide Access  
for Students With  
Disabilities**

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# Summary

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## **Results in Brief**

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✓ *Have established adequate policies*  
**Audit Highlights...**  
*comply with ADA.*

### **CSU and UC:**

✓ *Campuses have adequate guidelines to provide services.*

✓ *Students indicate high level of satisfaction with services.*

✓ *Campuses generally comply with ADA; however, some have not completed self-evaluations or eliminated all physical barriers.*

To address the needs of students with disabilities, the federal government passed the Rehabilitation Act of 1973 (Rehabilitation Act). The Rehabilitation Act states that no otherwise qualified disabled individuals shall, solely by reason of the disability, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under any program receiving federal assistance. In 1990, the federal government reinforced its commitment to individuals with disabilities by enacting the Americans with Disabilities Act (ADA), which provides people with disabilities civil rights protection and places emphasis on providing them with full opportunities and adequate access. Specific provisions of both the Rehabilitation Act and the ADA regulate programs and activities provided by public entities.

Because the California State University (CSU) and University of California (UC) postsecondary systems are considered to be public entities, they must comply with the provisions of the Rehabilitation Act and ADA. We reviewed the CSU and UC systems as a whole and six individual campuses within the two systems to determine whether each public entity is complying with the ADA and providing computer access to its students with disabilities. During our review, we noted the following:

- Overall, the Chancellor's Office of the CSU and the Office of the President of the UC have developed adequate policies requiring their respective campuses to comply with provisions of the ADA.
- In addition, the four CSU and two UC campuses that we visited have developed adequate guidelines to meet the needs of, and provide access to, their students with disabilities.
- Furthermore, students at the six campuses we reviewed indicated a high level of satisfaction with services provided by their respective campuses. However, some CSU students commented that campus faculty members need to be more aware of the ADA requirements.

- Although the campuses we visited provide students with disabilities with adequate access to computers, we did note conditions at two CSU campuses where students' access to computer software and equipment may be impeded.
- Although the campuses we visited have developed guidelines to address the needs of disabled students, not all the campuses fully complied with the ADA requirements for self-evaluations. For example, one CSU campus had not completed its self-evaluation, and another CSU campus did not adequately address the elements as required by the ADA Technical Assistance Manual.
- Finally, although the ADA requires public entities to remove physical barriers by January 26, 1995, progress to remove the barriers at the four CSU campuses that we reviewed has been slow. In contrast, a significant portion of the barriers have been removed from the two UC campuses.

## ***Recommendations***

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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.

To address conditions and remove barriers that may be denying access to its students, the Chancellor's Office should do the following:

- Ensure that CSU Sacramento eliminates the access barrier to the library as soon as possible, and require the campus to provide an alternative means of accessibility for all students with disabilities until the barrier is eliminated.
- Instruct CSU Stanislaus to consider expanding the hours of its disabled services office or purchase additional adaptive equipment that can be placed in an open computer lab.
- Require all campuses to complete their self-evaluations as soon as possible and address the elements outlined in the ADA Technical Assistance Manual when completing their self-evaluations.

To maximize access for its students with disabilities, the CSU Chancellor's Office and the UC Office of the President should do the following:

- Instruct campuses to remove the architectural barriers identified in the transition plans as soon as possible. Furthermore, to expedite the process of eliminating the barriers, the campuses should look for alternative sources of funding to pay for the barrier removals.

### ***Agency Comments***

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The UC concurs with the findings and recommendations in the report. In addition, the president believes that the report recognizes the university's efforts to make campus programs accessible. Finally, the president stated the UC system will continue its efforts to remove architectural barriers identified in its campuses' transition plans.

The CSU Chancellor also concurred with the findings and most of the recommendations in the report. However, CSU does not agree with our recommendation to encourage students to transition out of the high-tech centers to open labs. While they recognize that the intent of the recommendation is to encourage mainstreaming of services and academic opportunities for students with disabilities, the CSU plans to encourage students to obtain services where it is most advantageous to the student and the campus.

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# Introduction

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To address the needs of people with disabilities, the federal government passed the Rehabilitation Act of 1973 (Rehabilitation Act). Section 504 of the Rehabilitation Act states that no otherwise qualified disabled individual shall, solely by reason of the disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program receiving federal assistance. In addition, the regulations implementing Section 504 state that a disability is applied with respect to an individual having a physical or mental impairment that substantially limits one or more of the person's major life activities. Appendices A and B describe in detail the disability classifications for the California State University (CSU) and University of California (UC) systems. Finally, the regulations implementing Section 504 require federal recipients to notify beneficiaries of their rights and to conduct a self-evaluation to determine if any discriminatory policies or practices exist.

In 1990, the federal government reinforced its commitment to the rights of people with disabilities by enacting the Americans with Disabilities Act (ADA). With passage of the ADA, people with disabilities were provided civil rights protection. In addition, the regulations implementing ADA expanded and clarified prohibitions against discrimination as first established by the Rehabilitation Act. The ADA describes these prohibitions in Titles I through V: Title I focuses on eliminating discrimination in employment practices, Title II addresses requirements with which public entities must comply, Title III addresses public accommodations and services operated by private entities, and Titles IV and V focus on telecommunications and miscellaneous provisions.

More specifically, Title II covers programs, activities, and services provided by public entities such as postsecondary institutions. Title II regulations state that no qualified individual with a disability shall, by reason of such disability, be excluded from participating in or be denied the benefits of the services, programs, or activities of a public entity or be subjected to discrimination by any such entity. Further, the regulations implementing Title II state that a public entity shall operate each program or activity so that when viewed in its entirety, it is readily accessible and usable by persons with disabilities.

## ***Assistance Manuals Provide Specific Guidelines***

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Although the ADA does not identify many specific requirements, it retains provisions of the Rehabilitation Act that assigned responsibility to the U.S. Department of Justice to coordinate the implementation of Section 504 of the Rehabilitation Act. Further, the California Department of Rehabilitation developed and distributed implementation guides to assist entities in complying with the provisions of the ADA and understanding their rights and responsibilities.

Specifically, the U.S. Department of Justice issued an ADA Title II Technical Assistance Manual that provides detailed instructions for complying with the general requirements of the ADA. The manual addresses nine subject areas, such as administration, communications, qualifications, program accessibility, and investigation and enforcement of complaints filed under the ADA.

According to the manual, the primary goal of the ADA is to provide equal participation of individuals with disabilities in the mainstream of society. The manual does not require public entities to make all their existing facilities accessible when attempting to achieve program accessibility, particularly if the entity can demonstrate that providing access would result in a fundamental alteration in the nature of its service, program, or activity or that it would place undue financial and administrative burdens on the entity. However, it does require public entities to make available appropriate auxiliary aids and services to ensure that its communication with individuals with disabilities is as effective as communication with others. For example, a campus could provide an auxiliary aid such as materials available in Braille for vision-impaired students.

In addition to the U.S. Department of Justice manual, the Department of Rehabilitation issued two assistance manuals: the ADA Title II Self-Evaluation Guide and the ADA Access Guide. The ADA Title II Self-Evaluation Guide identifies elements that public entities should address in their required self-evaluations and includes a series of checklists that public entities can follow in preparing their self-evaluations. The ADA Access Guide also provides checklists for public entities to follow when completing the transition plan section of the self-evaluation.

## ***Donahoe Higher Education Act***

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The Donahoe Higher Education Act (Donahoe Act), amended by the Legislature in 1987, specifies the categories of cost

for services that may be provided to students with disabilities at postsecondary institutions. It identifies services such as enrollment assistance, diagnostic assessment, disability-related counseling, mobility assistance, and specialized tutoring. Although the CSU system is required by law to comply with the provisions of the Donahoe Act, the UC system is not. However, the Office of the President of the UC system has developed guidelines for campuses in the UC system to follow when implementing the Donahoe Act. The Chancellor's Office of the CSU system and the Office of the President of the UC system have issued general guidelines and policies for their respective campuses to follow, but each campus has the autonomy to develop its own set of specific guidelines for complying with the Donahoe Act.

In addition to identifying the types of services that campuses may provide to students with disabilities, the Donahoe Act requires the development and distribution of a survey to students to determine their perceptions of the effectiveness of the services and programs provided for students with disabilities. These surveys ask students to evaluate overall services and may include questions that address certain specific services, such as computer accessibility. Further, each institution must conduct its survey at least once every five years, and the CSU Chancellor's Office and the UC Office of the President must incorporate the results of the surveys into a biennial report submitted to the Legislature.

### ***Population of Students With Disabilities Is Small Compared to the Overall Student Population***

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In fall 1994, the Chancellor's Office of the CSU system reported enrollment of approximately 10,300 students with disabilities at its 20 campuses. These students comprised 3.2 percent of the total systemwide enrollment of approximately 319,000 students.

Similarly, students with disabilities comprised a small percentage of the student population at the UC campuses. Specifically, in fall 1994, the Office of the President of the UC reported overall student enrollment of approximately 154,000 students, including approximately 3,100 students with disabilities, or 2.0 percent of the total enrollment. The

proportion of students with disabilities in both the CSU and the UC systems as well as at the six campuses we reviewed is shown in Table 1.

**Table 1**  
**Enrollment Statistics for CSU and UC**  
**Students With Disabilities Both Systemwide and**  
**at Six Campuses**

Campus	Population of Students With Disabilities	Total Student Population	Percent of Students With Disabilities in Student Population
<b>CSU systemwide</b>	<b>10,373</b>	<b>319,368</b>	<b>3.2</b>
CSU Dominguez Hills	455	9,744	4.7
CSU Sacramento	753	22,726	3.3
CSU Stanislaus	159	5,877	2.7
San Diego State University	910	28,372	3.2
<b>UC systemwide</b>	<b>3,123</b>	<b>153,462</b>	<b>2.0</b>
UC Davis	635	20,511	3.1
UC Los Angeles	649	31,346	2.1

Sources: California State University Chancellor's Office Database, Fall 1994.  
 University of California Office of Information Systems and Administrative Services Database, Fall 1994.

### **Scope and Methodology**

The purpose of the audit was to determine whether campuses in the CSU and UC systems are complying with federal and state laws pertaining to computer accessibility for students with disabilities. To determine the policies and actions that the two systems must take to provide access to computer facilities, equipment, programs, and services, we reviewed applicable federal and state laws, regulations, policies, guidelines, and technical assistance manuals. Our audit focused on the policies and procedures of the CSU Chancellor's Office and UC Office of the President to determine whether the CSU and UC systems met the intent of the law and adequately provided computer accessibility to their students with disabilities.

We selected four CSU campuses and two UC campuses to review: CSU Dominguez Hills, CSU Sacramento, CSU Stanislaus, San Diego State University, UC Davis, and UC Los Angeles. At each campus, we interviewed staff members in the disabled student services office, facility operations department, and computer department and the ADA coordinator to evaluate guidelines each campus had developed to provide services to students with disabilities and to determine whether they addressed the intent of the law. To determine whether the four CSU and two UC campuses properly notified students with disabilities of their rights and communicated campus guidelines, we reviewed public distributions, such as the campus catalog or semester class schedule. Finally, we reviewed minutes of meetings held by organizations for students with disabilities on each campus to determine whether the students themselves raised any concerns related to computer accessibility.

To assess the actions taken by the four CSU campuses and two UC campuses, we reviewed 62 student case files to evaluate whether the campuses followed their established guidelines and provided reasonable accommodations. Specifically, we determined whether the campuses complied with federal and state laws, CSU and UC policies, and individual campus guidelines regarding the verification of students' disabilities, the provision of services to students with disabilities, and the promptness and reasonableness of responses to students' requests for such services.

To determine if students with disabilities experienced problems with a campus' resolution of computer accessibility or general accessibility issues, we reviewed the results of surveys conducted by the six campuses. The purpose of the surveys was to ask students to evaluate services provided to students with disabilities. Specifically, we reviewed student ratings and written responses, if applicable, to determine whether any issues regarding computer accessibility were raised. Further, we determined whether the campuses took corrective action to address any issues related to computer accessibility. We also interviewed several students with disabilities to determine whether they were aware of their rights and to ascertain their perceptions of computer accessibility provided by the campuses they attended. We found one CSU student comment related to computer access and determined that the campus had taken corrective action to address the issue.

To determine whether there were any informal or formal grievances filed by students relating to computer accessibility, we reviewed complaint logs maintained by the disabled student services office, ADA coordinator, campus ombudsman, or student judicial affairs committee as applicable at each campus. Specifically, we reviewed

complaints filed or still unresolved during fiscal year 1994-95 and evaluated whether actions taken by the six campuses were prompt and reasonable. Further, we contacted the federal Office of Civil Rights to determine whether any students had filed formal complaints specific to computer accessibility directly with their office.

To evaluate each of the six campuses' compliance with federal and state laws, we reviewed the campus self-evaluations of compliance with the ADA. As part of this review, we determined whether the self-evaluation specifically addressed areas of noncompliance related to computer accessibility. If areas of noncompliance were noted, we assessed whether the campus had performed adequate followup procedures and corrective actions.

In addition to reviewing the self-evaluation for compliance, we also examined each campus' transition plan, which identifies architectural barriers and ADA noncompliance issues. Because architectural barriers may impede access to a building or program, we determined the progress made by comparing the estimated costs to remove the barriers to the actual amount of funds spent by the campuses. In addition to reviewing the transition plans, we toured computer facilities, libraries, and off-campus labs that provide computer services or programs to students with disabilities to observe any computer accessibility problems.

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# **Chapter 1**

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## ***The CSU and UC Campuses We Visited Have Developed Policies and Guidelines To Meet the Intent of Federal and State Laws***

### ***Chapter Summary***

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**B**oth the Chancellor's Office of the California State University (CSU) and the Office of the President of the University of California (UC) have developed policies requiring their respective campuses to comply with provisions of the Americans with Disabilities Act (ADA) and the Donahoe Higher Education Act (Donahoe Act). Although they provided guidance to the campuses, the Chancellor's Office and the Office of the President gave the campuses autonomy to develop their own guidelines to meet the educational needs of students with disabilities. We visited four CSU and two UC campuses and determined that all campuses have

established guidelines that cover a variety of topics, such as resolving students' requests for services, providing accommodations through auxiliary aids, and resolving grievances.

The campuses we visited properly notified students with disabilities of their rights and provided services to those students. Furthermore, each of the campuses has designated a specific office on campus where students with disabilities can seek assistance. A common goal for these offices is to assist each student so that the student can maximize the use of available services. For example, two CSU campuses and one UC campus established high-tech centers where students with disabilities can learn how to use adaptive computer equipment. In addition, three CSU campuses and one UC campus established student organizations that act as advocates for students with disabilities. Finally, in 1992, both the CSU and the UC systems surveyed their students with disabilities to determine the students' perceptions of the effectiveness of services provided by the respective campuses. The students at the campuses we visited indicated a high level of satisfaction with services provided at their campuses.

## ***CSU and UC Systemwide Policies Are Adequate To Meet the Intent of Federal and State Laws***

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The CSU and the UC systems are required to comply with federal provisions of the ADA. In addition, the CSU system is required to comply with state provisions of the Donahoe Act. According to CSU policy, the Chancellor's Office has ultimate responsibility for planning, implementing, and coordinating all systemwide programs and services for CSU students with disabilities. With the exception of a few general policies and directives, the Chancellor's Office delegated most of its authority to the individual campuses for the development of guidelines to serve the needs of its students with disabilities. In 1989, the Chancellor's Office issued a general policy to its campuses, "Policy for the Provision of Services for Students with Disabilities," to assist individual campuses in complying with the provisions of the Donahoe Act. This policy communicated the access goals of the CSU system as a whole and directed individual campuses to provide specific services as required by the Donahoe Act. Subsequent to passage of the ADA, the Chancellor's Office issued an October 1992 memorandum notifying campus presidents of the general requirements of the federal ADA law and their responsibilities to ensure that their respective campuses complied with those requirements.

***CSU Chancellor  
and UC President  
have delegated  
much of the  
responsibility for  
meeting ADA  
requirements to  
their campuses.***

Similar to the CSU system, the administrative management and coordination of the nine UC campuses is carried out by the Office of the President. Specifically, the Office of the President is responsible for setting policies and guidelines that are consistent with federal and state laws. Although not expressly mandated by law, the Office of the President has developed policies to ensure that each campus complies with provisions of the Donahoe Act. Specifically, the Office of the President issued "Guidelines Applying to Nondiscrimination on the Basis of Disability," which defines a variety of services that campuses should provide to students with disabilities, such as admission assistance, auxiliary support services and devices, disability counseling, and placement services. According to these guidelines, each member of the university community shares the responsibility of maintaining conditions that are conducive to the achievement of the university's mission of public service. Furthermore, the guidelines encourage faculty, disability management staff, and students with disabilities to work together to formulate accommodations that meet the individual educational needs of students with disabilities while maintaining the academic integrity of the program, service, or activity to be modified.

***Campus Guidelines Are  
Adequate To Meet the Intent  
of Federal and State Laws***

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Although the CSU Chancellor's Office and the UC Office of the President have issued general directives, they have given the campuses autonomy to establish their own guidelines to implement the requirements of the ADA. To evaluate the guidelines established by individual campuses, we visited four CSU and two UC campuses: CSU Dominguez Hills, CSU Sacramento, CSU Stanislaus, San Diego State University, UC Davis, and UC Los Angeles (UCLA). Each of the six campuses that we reviewed has developed guidelines that cover a variety of topics, such as responding to student requests, providing accommodations through auxiliary aids, and resolving grievances.

Although each of the six campuses has developed and implemented various guidelines, some of these do not specifically relate to computer accessibility for students with disabilities. For instance, a CSU Stanislaus pamphlet states that the campus will make resources available to students with disabilities to enable them to achieve their educational objectives. This general guideline does not specifically address computer accessibility. However, we did note that in addition to the general guidelines, two CSU and two UC campuses have developed specific guidelines relating to computer accessibility. For example, the San Diego State University campus developed a policy guide stating that students with documented disabilities are entitled to receive approved auxiliary aids, such as the use of adaptive equipment, that will enable them to participate in and benefit from campus programs and activities. In addition, UCLA has created an entire program, the Disability and Computing Program, to meet the computer accessibility needs of its students with disabilities and facilitate the integration of adaptive computing technology into the various areas of instruction. This program is discussed in greater detail later in this chapter.

## ***Grievance Process Appears Reasonable***

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***Campuses we visited have informal and formal grievance processes to resolve students' complaints.***

In addition to developing guidelines and notifying the students of their rights, the campuses that we reviewed have developed grievance procedures to assist students with disabilities in resolving complaints. Each of these campuses has an informal and a formal grievance process. Furthermore, at most of the campuses we reviewed, the informal grievance process occurs in two stages. In the first stage, a disabled student can raise a concern or request to a counselor or coordinator who has been assigned to the student by the campus. These counselors evaluate students' needs for services or accommodations on a case-by-case basis.

The second stage of the informal process occurs after an initial request has been made. If the student is not satisfied with the resolution, he or she may file an informal grievance. For example, a UC Davis student can file an informal grievance with the Student Judicial Affairs Committee. UC Davis established this informal committee to assist in the resolution of complaints through investigation, mediation, and conciliation. A UC Davis campus representative will work with the student to coordinate services with other departments to reach an acceptable accommodation.

If a student wants to file a formal complaint, he or she has two options. At three CSU and two UC campuses that we reviewed, a student can file a formal complaint with the appointed official at the individual campus, typically the campus ADA coordinator. The second option, which is available to students at all six campuses we reviewed, is to file an Office of Civil Rights complaint directly with the U.S. Department of Education, Office of Civil Rights Division.

## ***Campuses Properly Notify Students of Their Rights***

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***Campuses use various methods to notify students of their rights.***

The regulations implementing the ADA require each public entity to notify persons with disabilities of their rights. Because all provisions of the ADA apply to the CSU and UC systems, each campus is required by law to inform its students with disabilities of their rights. All six of the campuses that we visited notify students of their rights and campus policies through a variety of sources. First, the CSU and UC systemwide enrollment applications contain statements referring students with disabilities to information that will tell them what services are available and defining the systemwide policy on nondiscrimination. Further, each of the student catalogs or class schedules for the campuses that we visited contains information specific to that particular campus regarding the

rights of students with disabilities. We also noted that the campuses distribute additional literature that details services available to these students. For example, CSU Dominguez Hills issues a handbook that provides information on student responsibilities and services available to students with disabilities. At UCLA, the campus communicates with its students through newsletters. These newsletters keep the campus community current on policies, events, and government activities. The newsletter “New Horizons” publishes items of interest, such as notification of Disability Awareness Month and information on arranging for support services and surviving the first quarter at UCLA as a student with disabilities. Many of these publications are available in alternative formats, such as in Braille for vision-impaired students.

In addition to notifying students with disabilities of their rights, the campuses that we reviewed notify these students of their responsibilities. CSU Dominguez Hills distributes a pamphlet, for example, that specifies that it is the responsibility of the student to become informed and make use of the resources and services available on the campus. In a CSU Sacramento outreach pamphlet, the campus specifies that students with disabilities have the responsibility of making their educational needs known to campus staff via a request, a complaint, a grievance, participation in a committee, or a comment on a survey document. Moreover, if a student with disabilities does not fulfill his or her responsibilities and notify the campus of his or her needs via a request, complaint, grievance, or comment on a survey document, a campus may not be aware of an accommodation or access problem. In another example, UC Davis has its students with disabilities read and sign an auxiliary service agreement that outlines both the students’ and campus’ responsibilities. This agreement helps to ensure that students work closely with a disability resource center counselor to obtain appropriate accommodations to meet their individual needs.

***Services Are Provided by the  
Disabled Student Services Office***

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***Disabled Student Services offices strive to maximize integration of students into campus community.***

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Although both the CSU Chancellor's Office and the UC Office of the President have issued policies describing specific services that the individual campuses should provide to students with disabilities, including academic accommodations and access to and arrangements for adaptive educational equipment, the main responsibility to provide these services rests with a specific office on each campus. The offices at each campus we reviewed may differ slightly in name, but they all perform similar functions. For example, the Disabled Student Services office at CSU Dominguez Hills coordinates services to assist students with disabilities in completing their education. The goal of the Disabled Student Services office is for each student with disabilities to use the available services to maximize the student's independence and full integration into the campus community. At UC Davis, the campus provides services to students with disabilities through its Disability Resource Center, whereas UCLA provides services through its Office for Students with Disabilities. Because the functions of the campus offices at the other five campuses we visited are similar to those of the Disabled Student Services at CSU Dominguez Hills, we refer to each of these offices as the Disabled Student Services office.

A student with disabilities is given the opportunity to identify himself or herself as a student with disabilities through the campus admission application process. After a student identifies himself or herself as disabled, the four CSU and two UC campuses that we reviewed provide the student with information on services available and the process for receiving such services. For example, UCLA provides students with disabilities with additional information related to computer adaptive aids, campus accessibility, and a specialized microcomputer lab.

At each of the campuses we visited, we noted that students can make an appointment to meet with a Disabled Student Services office counselor to assess their needs and determine what services they should obtain. However, we also noted that in addition to providing counselors, UCLA uses a team approach to deliver services for students with disabilities who use multiple services. Under the team approach, service coordinators from departments on campus, technical support people from the Disability and Computing Program, and the student's coordinator meet with the student as a group to determine how best to serve the student's disability-based service needs.

### ***Disabled Student Organizations Are Established at Some CSU and UC Campuses***

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***Student  
organizations act  
as advocates for  
students  
with disabilities.***

In addition to providing the Disabled Student Services office, three CSU campuses and one UC campus have established organizations that act as advocates for students with disabilities. For example, the main function of Andante, the organization for students with disabilities at CSU Dominguez Hills, is to address student concerns regarding campus awareness and full integration into the mainstream of campus. At CSU Sacramento, the students have formed the Disabled Student Union. The union strives to advocate issues of students with disabilities in the CSU system as a whole and increase campus awareness of the needs and abilities of these students.

In addition to having committees with student-only membership, five of the six campuses we visited have an active advisory committee on persons with disabilities. The remaining campus, CSU Dominguez Hills, is establishing an advisory committee. At CSU Sacramento, this committee is known as the Committee on Persons with Disabilities and consists of administrators, staff and faculty members, and students with disabilities. Part of the committee's purpose is to review policies and procedures to ensure that all students have equal access, that all facilities are architecturally barrier-free, and that reasonable accommodation for students with disabilities is provided.

### ***Some Campuses We Reviewed Use High-Tech Centers To Provide Computer Accessibility***

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A campus can use a variety of methods to provide computer accessibility and meet the intent of federal and state laws. The CSU Dominguez Hills and CSU Stanislaus campuses have general policies and procedures to guide them in successfully accommodating students' computer accessibility requests. For example, the Disabled Student Services office at CSU Dominguez Hills received a request from a mobility-impaired student to provide access to a computer workstation in one of the computer labs. To provide access for the student, the office adjusted the height of several workstations to accommodate students who use wheelchairs.



***High-tech centers teach students with disabilities to use adaptive equipment.***



To meet the computer needs of students with disabilities, two CSU campuses, CSU Sacramento and San Diego State University, and the two UC campuses, UC Davis and UCLA, have established separate adaptive equipment centers or programs. Although not required to do so, the two CSU campuses and UC Davis use high-tech centers to accommodate computer accessibility requests from their students with disabilities. The purpose of these high-tech centers is to teach students with disabilities how to operate various types of adaptive equipment. Staff members in the high-tech centers provide classes, workshops, or training in computer basics and adaptive computer technology.

Although a goal of the ADA and campus Disabled Student Services office is to integrate students into the mainstream campus environment, during our review we noted that a high-tech center's purpose and its use may conflict with this goal. In theory, after a student is proficient in the use of the adaptive equipment, he or she would be integrated into an open computer lab with other students without disabilities. Through our interview with the high-tech center instructor at CSU Sacramento, we noted that some students with disabilities prefer to use a high-tech center as their primary computer lab to complete all educational work. As a result, students with disabilities may not be fully integrated into the mainstream of the campus community.

At CSU Sacramento, the high-tech center instructor states that many students with disabilities prefer to work on adaptive equipment in the high-tech center rather than on adaptive equipment in an open computer lab. According to the instructor, students state that equipment in open labs often does not work properly, which creates downtime for the students. In contrast to the open labs, the high-tech center has its own computer technician on site to resolve computer malfunctions or problems immediately. Moreover, students have commented to the high-tech center instructor that lab assistants in the open labs do not have adequate knowledge of disabilities in general. Combined with the computer equipment problems, the perceived lack of knowledge discourages students with disabilities from making the transition out of the high-tech center environment and into the integrated campus environment.

The ADA Title II Technical Assistance Manual identifies the potential conflicts that a public entity may have while attempting to provide accommodations to a student with disabilities in an integrated setting and states that in some cases, campuses must provide reasonable accommodation to a student in an area different from where the normal delivery of service takes place because of space constraints or physical configurations. Moreover, after a campus has attempted to meet a student's request, the law allows a

campus the flexibility to select the specific adaptive aid or service that it will provide as an accommodation, as long as the aid or service is effective. However, a public entity is still encouraged to provide equal opportunity to students with disabilities and to integrate the students to the maximum extent possible to meet the ADA goal of mainstreaming.

Regardless of the method used to accommodate and fully integrate students with disabilities with other students, each campus should encourage students to make the transition from a high-tech center environment to the open campus environment. This transition allows students to become more independent and productive in a computer environment and maximizes their opportunity to benefit from all university programs and services.

### ***The UCLA Campus Is Advanced in Providing Computer Accessibility to Students***

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In addition to the high-tech centers offered on the CSU Sacramento, San Diego State University, and UC Davis campuses, the UCLA campus has established a separate program to meet the computer accessibility needs of its students with disabilities. Specifically, in 1988, UCLA established the Disability and Computing Program in response to concerns that no campus computer facilities were accessible to students with disabilities. Organizationally, the Disability and Computing Program is located within UCLA's Microcomputer Support Office, which is part of the Office of Academic Computing. UCLA's philosophy is that having the Disability and Computing Program located in the microcomputer office allows the program to serve as the liaison with campus departments and outside vendors regarding advanced microcomputer technology for persons with disabilities. Furthermore, this structure facilitates the intent that staff in the Disability and Computing Program work closely with other campus offices to provide an accessible computing environment.

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***UCLA's Disability and Computing Program provides campuswide coordination and support to students with disabilities.***

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The mission of the Disability and Computing Program is “to facilitate the integration of adaptive computing technology into the areas of instruction, research, and employment to benefit students, faculty, and staff with disabilities, and to provide campuswide coordination and support for access to computers, local area networks, and on-line information resources by people with disabilities.” To fulfill this mission, UCLA established a computing support coordinator in each academic and administrative department. This coordinator is responsible for identifying the computer needs of students with disabilities and working with Disability and Computing Program staff to provide computer equipment. The program staff work with department coordinators on the operation of the adaptive equipment to ensure that students with disabilities receive equal access to campus instructional computer labs. Through the campuswide coordination of efforts, a person with disabilities has access to adaptive equipment in the most integrated setting possible.

In addition to its staff providing training to department coordinators, the Disability and Computing Program functions like high-tech centers at other campuses. For example, staff members in the program teach students with disabilities how to use adaptive equipment so that the students can enhance their academic independence and productivity. Further, the program staff operates a public demonstration facility for students. Here, Disability and Computing Program staff members provide students with disabilities with one-on-one training on the adaptive equipment.

Finally, the Disability and Computing Program staff assists academic and administrative departments in acquiring their own adaptive equipment. To facilitate the acquisition of adaptive equipment, the program staff operates an equipment loaner pool. Using the pool of equipment, the program staff loans adaptive equipment to a department until the respective department obtains the funds necessary to acquire its own adaptive equipment. Furthermore, after a department obtains adaptive equipment, the program staff will provide a lab technician to troubleshoot any problems it may encounter with the equipment. Similarly, the program staff loans out equipment to students so that they can evaluate different types of adaptive equipment before purchasing their own equipment. After a student has made the decision to purchase a piece of adaptive equipment, the staff also assists the student in applying for grants for student-owned computer systems.

### ***Students With Disabilities at the Campuses We Reviewed Indicate High Satisfaction With Services***

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As required by the Donahoe Act, the CSU and UC systems developed and distributed a survey to students to obtain their perceptions of the effectiveness of the services provided to students with disabilities by individual campuses. To compile the survey data, the Chancellor's Office provided its CSU campuses with a survey instrument that asked students to rate the Disabled Student Services office staff and the campus as a whole as to their responsiveness to the general access needs of students with disabilities. In addition, the survey asked the respondents to rate the campuses' responsiveness in areas such as prompt removal of architectural barriers and effectively providing access to adaptive equipment and materials. Lastly, the survey instrument provided a designated space for written comments.

Similar to the CSU Chancellor's Office, the UC Office of the President provided each campus in the UC system with a survey instrument to evaluate the services provided to students with disabilities by the campuses. Specifically, the survey asked students to rate the services provided and the availability and effectiveness of access to adaptive equipment on a scale of 1 to 4, with 1 representing the lowest level and 4 representing the highest level of satisfaction. In addition, students were asked to rate the knowledge of Disabled Student Services staff regarding disability issues.

In May 1993, the CSU Chancellor's Office and the UC Office of the President summarized the individual campus survey data, collected in August 1992 and spring 1992, respectively, and each submitted a report to the Legislature. According to the Chancellor's Office's report, approximately 1,500 of the 9,000 CSU students with disabilities systemwide responded to the survey. On average, approximately 98 percent of students systemwide agreed to the statement that the campuses are prompt and responsive in removing architectural barriers. Furthermore, on a scale of 1 to 5, with 1 being poor and 5 being excellent, CSU students systemwide rated their access to adaptive computer equipment with an average rating of 3.7. According to the UC report, approximately 1,400 of the 2,000 UC students with disabilities systemwide responded to the survey. The Office of the President's report indicated that 75 percent of students systemwide were somewhat or very satisfied with the effectiveness of their campuses in meeting students' needs for academic accommodations. Further, students rated the availability and effectiveness of adaptive equipment with an average



**Students at CSU  
and UC campuses  
give high ratings  
for accessibility to  
adaptive equipment.**

of 3.2 on a scale of 1 to 4, with 1 representing the lowest level and 4 representing the highest level of satisfaction.

During our site visits at the four CSU campuses, we reviewed 453 survey responses from students with disabilities at the individual campuses. Approximately 98 percent of the students with disabilities at the four campuses agreed with the statement that the campuses are responsive to the access needs of students with disabilities. Mirroring the results of the systemwide survey, the students at the four campuses rated their access to adaptive equipment with an average rating of 3.7 on a scale of 1 to 5.

The UC Office of the President provided spring 1992 survey results for its UCLA and UC Davis campuses. Although we did not review individual survey responses at UCLA, we did review the overall survey results. On a scale of 1 to 4, UCLA students gave the administration of services to students with disabilities a high rating of 3.6 and access to adaptive equipment a high rating of 3.6. We were able to review individual survey responses received from UC Davis' students. Of the 349 responses we reviewed, we did not find any written comments regarding accessibility to computers.

***Faculty on Some CSU Campuses  
May Need Training***

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**CSU students  
indicate that  
faculty may lack  
proper knowledge  
of  
ADA laws.**

During our site visits at the four CSU campuses, we obtained and reviewed copies of the actual responses to the surveys received from the campus students. Of the 453 survey responses reviewed, we found 47 written comments that dealt with the lack of training for faculty and staff. For example, one student commented that campus staff members lacked an understanding of learning disabilities. This sentiment was echoed by other written comments on the surveys that indicated that faculty instructors were not knowledgeable of certain types

of disabilities, ADA laws, or reasonable accommodation. However, these written comments encompass only approximately 10 percent of all survey responses reviewed.

According to a memorandum issued by the Chancellor's Office in 1992, the responsibility for providing training on the requirements of the ADA lies with the individual campus. To fulfill this responsibility, two of the four CSU campuses, San Diego State University and CSU Stanislaus, have developed handbooks to inform faculty of legal requirements, types of disabilities, services available, and responsibilities of faculty. At San Diego State University, the Disabled Student Services coordinator regularly attends faculty meetings in which she discusses disability-related issues, including computer access. In the CSU Stanislaus handbook, faculty members are given an overview of the services available to students with disabilities to ensure compliance with the ADA. Further, the handbook informs the faculty that the Disabled Student Services office maintains adaptive equipment designed to facilitate independence for persons with disabilities. Although San Diego State University and CSU Stanislaus distributed faculty handbooks, they did not provide any formal training to faculty members to assist them in interpreting campus policies or the requirements of the ADA.

CSU Stanislaus had not conducted much ADA training before February 1995. However, with the recent appointment of a new ADA coordinator, the campus has taken steps to increase the campus community's awareness of the laws. Specifically, the ADA coordinator has arranged two training classes for management personnel and school deans. The campus also conducted a training class with all department chairs in October 1995. Further, CSU Stanislaus has set goals for fiscal year 1995-96, such as providing ADA-related training for all staff members in the counseling/career development center by May 1996.

The remaining two CSU campuses did not distribute handbooks or provide formal training to their faculty on disability issues. One campus, CSU Sacramento, scheduled two ADA public forums and one teleconference as of August 1995. However, faculty and staff members were not required to attend these training seminars.

### ***Conclusions***

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Both the CSU Chancellor's Office and the UC Office of the President have developed policies requiring their respective campuses to comply with provisions of the ADA. In addition, each of the campuses we visited has established guidelines that meet the

intent of the ADA. Furthermore, we noted that the campuses properly notified students with disabilities of their rights and established processes to provide various services to them. For example, although all six campuses provide general access and services through a Disabled Student Services office, two CSU campuses and one UC campus offer a high-tech center to provide computer access to their students with disabilities. Finally, a 1992 survey of students with disabilities at the campuses indicated that students were satisfied with services provided to them.

## ***Recommendations***

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To maximize integration of students with disabilities into the mainstream of the campus community and increase awareness of the ADA, the CSU Chancellor's Office should do the following:

- Instruct campuses to encourage students to transition out of the high-tech centers and into open labs;
- Encourage campuses to develop disability awareness and reasonable accommodation training programs for lab assistants located in open labs throughout each campus; and
- Encourage campuses to provide training programs or seminars and require mandatory attendance by campus faculty and staff.

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# Chapter 2

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## ***Most CSU and UC Campuses We Visited Provide Adequate Computer Access, but Some Have Not Complied Fully With ADA Requirements***

### ***Chapter Summary***

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**M**ost of the campuses that we visited provide students with disabilities with adequate access to computers. Each of the four California State University (CSU) and two University of California (UC) campuses has developed either guidelines that specifically address computer accessibility or general policies to guide faculty and staff in providing access to the respective campus' programs, services, and activities. However, at two CSU campuses, CSU Sacramento and CSU Stanislaus, we noted conditions where a student with disabilities may be denied access to computer software and equipment. For example, at CSU Stanislaus, adaptive computer equipment is available in the Disabled Student Services office; however, the office is open only during normal business hours, 8 a.m. to 5 p.m. As a result, students with disabilities who attend evening classes may not have access to the adaptive equipment.

Although the campuses we visited have developed guidelines to address the needs of students with disabilities, not all of these campuses comply fully with the Americans with Disabilities Act (ADA). For example, although the regulations implementing the ADA required campuses to complete a self-evaluation by January 26, 1993, CSU Stanislaus had not completed its self-evaluation as of October 1, 1995. In addition, CSU Sacramento's self-evaluation did not adequately address the elements required by the ADA Technical Assistance Manual. Finally, as part of the self-evaluation, the ADA required each campus to complete a transition plan that identified physical barriers that may deny students access to facilities or programs. Although the four CSU campuses we reviewed completed their transition plans, progress to remove the barriers has been slow. The two UC campuses that we reviewed have removed a significant portion of the barriers identified in their transition plans.

## ***Most Campuses We Reviewed Provide Adequate Computer Access to Their Students With Disabilities***

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Each of the campuses we reviewed has established guidelines for providing certain services, including disability counseling and provision of auxiliary aids. One type of auxiliary aid that a campus must provide is access to and arrangement for adaptive educational equipment. Adaptive equipment includes hardware or software products that provide access to a computer that is otherwise inaccessible to an individual with a disability, such as Braille keyboards, voice synthesizers, and adjustable height computer tables.

CSU Sacramento, San Diego State University, UC Davis, and the University of California, Los Angeles (UCLA), operate either a facility or program that specifically addresses computer accessibility or the availability of adaptive computer equipment. For example, UCLA created an entire program, the Disability and Computing Program, to meet the computer needs of its students. Specifically, staff members in the Disability and Computing Program provide training on adaptive equipment, assist departments or students with the purchase of equipment, and facilitate integration of students with disabilities into the mainstream campus community. However, CSU Stanislaus and CSU Dominguez Hills have developed general guidelines to assist their staff in providing access to the campuses' programs, services, and activities. Furthermore, these CSU campuses' general guidelines address computer access needs as they relate to services such as availability of auxiliary devices and grievance resolution.



***Campuses handle requests for access on a case-by-case basis***

We noted that the campuses we visited handle requests for access on a case-by-case basis in the Disabled Student Services office. Specifically, a student with disabilities can make an appointment to meet with a Disabled Student Services office counselor so that together they can assess the student's needs and determine what services the student should obtain. After the initial appointment, the counselor establishes a case file to document verification of the student's disability, specific requests for accommodations, and services provided to the student.

To determine if there were any computer-related services requested by a student, we reviewed 62 case files at the six campuses we visited. Further, we assessed whether the requests were met promptly and whether the resolutions were reasonable. During our review, we attempted to select only those case files that related to computer accessibility. However, only UC Davis had its files organized in such a manner so as to allow us to select specific files

that dealt with computer access issues. As a result, of the 62 files we reviewed, only 13 dealt specifically with computer access requests. In all 13 cases, we found that the requests were accommodated in a prompt and reasonable manner. For example, at UC Davis, the Disability Resource Center was able to accommodate the computer needs of a visually impaired student by providing a large print computer screen within two weeks of the original request. The remaining 49 files indicated that in all cases the students' requests for services were satisfied.

### ***CSU Stanislaus May Impede Access to Students With Disabilities***

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◆  
***Adaptive equipment in Disabled Student Services office not available during evening hours.***

Although the campuses we visited have developed guidelines to provide access, during our review we noted that one campus, CSU Stanislaus, may not be adequately accommodating the computer needs of its visually impaired students. Specifically, although the campus has adaptive equipment for these students, the staff members in the computer labs are not trained properly in the use of the equipment. CSU Stanislaus purchased adaptive software several years ago in response to a request by a visually impaired student. Although the lab assistant at that time was trained on its usage, currently no staff person in the computer labs can operate the software.

In addition, although CSU Stanislaus issued a guideline stating that students with disabilities could use adaptive equipment located in the Disabled Student Services office and staff members in the office are knowledgeable of the equipment's operation, the office is open only from 8 a.m. to 5 p.m. Therefore, the equipment is not available to students with disabilities during the evening hours. Because of the limited hours of operation, the adaptive equipment is often unavailable for use by the students. CSU Stanislaus considered establishing a high-tech center; however, the Disabled Student Services director and counselor stated that because of a shortage of both physical space and funding for equipment and staff, the Disabled Student Services office has been unable to establish a high-tech center. Nevertheless, the office stated that to best serve students with disabilities and ensure greater accessibility during evening hours and weekends, it believes that a high-tech center should be located in an open computer lab.

## ***CSU Sacramento May Impede Access to Its Library***

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During our review at CSU Sacramento, we noted that some students with disabilities may not have access to the campus library. Specifically, we found a formal grievance filed with the Office of Civil Rights alleging that the ramps leading into the library either deny access or make access hazardous for persons with disabilities. Because the high-tech center, where students with disabilities learn how to use adaptive computer equipment, is located in the library, this issue directly affects students' access to computer services and programs on campus. Furthermore, the library contains computer terminals that students with disabilities may need to use to conduct research.

***High-tech center in  
library is not  
accessible to all  
students with  
disabilities.***

After receiving notice of the formal complaint, CSU Sacramento implemented an alternative interim access procedure to provide reasonable accommodation to students with disabilities.

Specifically, the procedure allowed some students to gain access to the library through a nonpublic entrance in the University Media Services department. However, the director of services to students with disabilities did not distribute notification of the procedure to all students with disabilities; instead, the notification was distributed to a handful of students selected by the director. As a result, some students' access to computer services available in the library may be impeded.

To address the access issue, CSU Sacramento plans to use its minor capital outlay allocation for fiscal year 1995-96 to construct a permanent exterior elevator on the outside of the library building to provide access to all students with disabilities. However, in the interim, notification of the alternative procedure will be revised and distributed to all students with disabilities during the spring 1996 semester.

## ***San Diego State University Provided Reasonable Accommodation***

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At San Diego State University, we found an access issue that was resolved promptly and reasonably. During our review of informal grievance logs at the university, we found one complaint that dealt with a student's need to access adaptive equipment located in the campus high-tech center during winter break when the center was being permanently relocated. In response to the complaint, the high-tech center director installed the necessary adaptive software in another location that was accessible to the student.

## ***ADA Required CSU and UC To Complete Self-Evaluations***

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***Purpose of  
self-evaluations is  
to identify areas of  
noncompliance  
with  
ADA.***

The regulations implementing the federal Rehabilitation Act of 1973 (Rehabilitation Act), Section 504, required each public entity receiving federal funds to complete a self-evaluation of its programs and services. In 1990, the federal government reinforced its commitment to the rights of people with disabilities by enacting the ADA. The ADA expanded and clarified prohibitions against discrimination first established by the Rehabilitation Act. In addition, it required public entities to complete another self-evaluation by January 26, 1993. The purpose of this self-evaluation was to identify areas of noncompliance and correct any policies and procedures that were inconsistent with the ADA. As part of this self-evaluation, the regulations encouraged public entities to obtain the input and assistance of persons with disabilities.

To assist public entities in completing a self-evaluation, the U.S. Department of Justice issued the ADA Title II Technical Assistance Manual. This manual addresses administrative requirements, including the completion of a self-evaluation, necessary to comply with the ADA. In addition, the California Department of Rehabilitation issued the ADA Title II Self-Evaluation Guide. This guide describes specific elements that a public entity should address in its self-evaluation, for example, general policies and practices, communications, evacuation from buildings, employment, buildings and facilities, and architectural barriers.

In October 1992, the Chancellor's Office informed each CSU campus that it must evaluate its current policies and practices and identify and correct any deficiencies in complying with the ADA. Furthermore, the Chancellor's Office provided its individual campuses with a procedural outline to assist them in completing the self-evaluation documents. To assist the campuses in preparing the self-evaluation, the Chancellor's Office conducted an October 1992 systemwide training on the requirements of the ADA. Participants in the training received several ADA handbooks and technical assistance manuals. Finally, the Chancellor's Office distributed a self-evaluation model that the campuses could use to complete their self-evaluations.

As the Chancellor's Office did for the CSU campuses, the Office of the President of the UC system also directed its campuses to perform self-evaluations. Specifically, in its May 1992 "Guidelines for Facilities Compliance with ADA," the Office of the President instructed each campus to evaluate current services, policies, and

practices in relation to the ADA. Further, the Office of the President directed its campuses to evaluate the effects of those services and policies that do not meet ADA accessibility requirements. Finally, the Office of the President guidelines emphasized that the campus self-evaluation should address the elements discussed in the ADA Title II Technical Assistance Manual.

### ***One CSU Campus Has Not Completed Its Self-Evaluation; Another Is Inadequate***

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None of the four CSU campuses that we visited had completed the required self-evaluation by the January 26, 1993, deadline. CSU Dominguez Hills and CSU Sacramento did not complete their self-evaluations until December 16, 1994, and August 22, 1995, respectively. Further, San Diego State University did not complete its self-evaluation until September 26, 1995. As of October 1, 1995, CSU Stanislaus had not completed its self-evaluation. Using the three self-evaluation documents that were completed, we determined whether the campuses had addressed the elements required by the ADA Title II Technical Assistance Manual and identified any areas of noncompliance concerning computer accessibility.

Based on our review, CSU Dominguez Hills' and San Diego State University's self-evaluations contained the elements required by the ADA Title II Technical Assistance Manual and had evidence of input from students with disabilities. For example, after CSU Dominguez Hills obtained input from more than 59 departments located throughout the campus, the campus had its disabled student organization review the responses. However, because CSU Dominguez Hills' self-evaluation did not have a section on computer accessibility, we could not determine if the campus identified any areas of noncompliance with computer access. In contrast, San Diego State University's self-evaluation did have a section on computer accessibility and reported that most campus computer labs were accessible.

  
***CSU Sacramento's self-evaluation does not adequately address ADA requirements.***

Although CSU Sacramento completed its self-evaluation, the evaluation did not adequately address the elements as required by the ADA Title II Technical Assistance Manual. The manual allows a public entity to begin its self-evaluation process using the evaluation it had prepared to comply with Section 504 of the Rehabilitation Act. Further, although the manual indicates that the entity could use the old self-evaluation as a base, it also states that the entity should follow up to determine if programs and policies have changed and whether corrective actions taken to ensure

compliance with Section 504 have been implemented fully or are no longer effective. In addition, the ADA Title II Technical Assistance Manual encourages public entities to consult with students with disabilities to assist in the self-evaluation process. However, CSU Sacramento submitted the old self-evaluation it conducted in 1979 without performing any followup procedures to ensure that the evaluation reflects the campus' current status of compliance. Furthermore, CSU Sacramento obtained survey responses from only three campus departments instead of performing a comprehensive examination of programs, activities, and services campuswide.



***CSU Stanislaus  
has not completed  
its  
self-evaluation.***



The one remaining CSU campus that we reviewed, CSU Stanislaus, has begun its self-evaluation process. Although the campus has developed its survey document, it is still collecting survey responses. Further, the campus stated that its self-evaluation was incomplete because of the previous ADA coordinator's failure to follow through on the guidelines issued by the Chancellor's Office.

By not conducting a complete self-evaluation as required by law, campuses may be unaware that their programs, services, and activities are not accessible to and usable by students, faculty or staff members who are disabled. As such, campuses may not be providing full opportunity to their students and employees who have disabilities. Moreover, campuses may put the safety of a person with disabilities at risk by not promptly identifying and correcting all areas of noncompliance.

***UCLA and UC Davis Completed Self-Evaluations  
by the Federal Deadline***

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We found that both UCLA and UC Davis completed self-evaluations by the required deadline of January 26, 1993. Although UCLA's self-evaluation contained the specific elements required by the ADA Title II Technical Assistance Manual, UC Davis did not explicitly address those elements. Specifically, UCLA developed its self-evaluation with input from the campus Chancellor's Advisory Committee on Disability, California Association of Persons with Handicaps, campus Union of Students with Disabilities, and campus Office for Students with Disabilities. The resulting evaluation consisted of seven sections covering items such as access to programs and computer technology. The computer technology section addressed accommodations and modifications that may be necessary to make computers accessible to students with disabilities on campus. Based on its summary of findings, the campus identified one entity that needed to provide

adaptive equipment to its media and language labs to ensure their accessibility.

Rather than conducting a structured campuswide survey to address the elements required by the ADA Title II Technical Assistance Manual, UC Davis used a different method. In terms of its ADA compliance, UC Davis merely collected signed certifications from each campus department verifying that its policies and practices did not limit access to or deny participation in its programs for students with disabilities.

### ***CSU and UC Systems Comply With ADA Requirement To Prepare Transition Plans***

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ADA required public entities to identify barriers by January 1993 and to remove them by January 1995.

As part of the self-evaluation, the ADA requires each public entity to complete a transition plan to identify architectural barriers that may deny access for people with disabilities to buildings, facilities, programs, and activities. Although the entire self-evaluation document was mandated by law to be completed by January 26, 1993, the transition plan was to be completed by July 26, 1992. The ADA Access Guide provides checklists that public entities can use when they conduct site surveys to identify barriers. Furthermore, the ADA required public entities to remove by January 26, 1995, all architectural barriers identified in the transition plan that may deny access.

To comply with the ADA, the Trustees of the CSU contracted with an outside consulting firm, Building Analytics, to prepare a transition plan for each of the 20 CSU campuses and 11 off-site locations in the CSU system. Although the transition plans were to be completed by July 26, 1992, the consultant did not complete the transition plans until May 1993. Further, the consultant's contract did not begin until July 6, 1992.

To collect field data to complete the plan, the consultant developed survey teams and distributed questionnaires to students, faculty members, and staff members. After the data were collected and summarized, the consultant compared the results to compliance tables based on ADA accessibility guidelines. In addition, campuses held public forums to obtain input from the disabled community, including disabled students, faculty and staff members, and local organizations.

After the data were compiled, the consultant ranked each area of noncompliance for architectural barrier removal, using the methodology outlined in ADA accessibility guidelines and estimated

***Barriers indicate noncompliance with ADA; however, they do not necessarily deny access.***

the costs to remove each of the barriers. For example, priority 1 measures are those necessary to provide general access to a place of public accommodation, site, or building, such as installing ramps and widening entrances. Priority 2 measures are those necessary to provide basic program access to specific areas where goods and services are made available to the public, such as rearranging tables in a computer lab. Priority 3 measures are those necessary to provide access to restroom facilities. These priorities constitute the minimum efforts required to alleviate barriers and provide full accessibility to students with disabilities. However, it should be noted that items associated with these priorities may not necessarily deny access, but they do not fully comply with the ADA guidelines as interpreted in the ADA Access Guide. Further, the focus of the transition plans addresses barriers in general, not specific to computer areas. As a result, the barriers identified may not be related to barriers to computer access.

In contrast to the CSU system, the UC Office of the President did not prepare a systemwide transition plan for its nine campuses; instead, each campus we reviewed prepared its own plan. However, the Office of the President, Assistant Vice President of Facilities Administration, has the responsibility of coordinating systemwide compliance and reviewing each campus transition plan. To help the campuses interpret the requirements of Title II of the ADA and to ensure consistent systemwide interpretation and compliance, the Office of the President issued "Guidelines for Facilities Compliance with the ADA." Specifically, these May 1992 guidelines established responsibilities for completing the transition plan, recommended elements that should be contained in the transition plan, and provided a sample transition plan format.

The Office of the President's policy specifically instructed each campus to develop and complete its own transition plan by July 26, 1992. UCLA, for example, established a transition plan work group to coordinate campus reviews and plan the analytical work required to produce a transition plan. This work group consisted of a diverse group of individuals from many different programs and departments. After the work group identified barriers to programs, the campus prioritized the barriers and identified what type of corrective action was required to achieve program accessibility. In its transition plan, UCLA prioritized barriers on a scale of 1 to 5. The highest priority received a ranking of 5; the ranking of 1 applied to barriers that are not specifically mandated to be removed, but the elimination of such barriers would enhance campus accessibility. After prioritizing the barriers, UCLA contracted with an outside consultant to estimate costs involved in removing the identified barriers.

***Progress To Remove Barriers  
at CSU Campuses Has Been  
Slow Because of Lack of Funds***

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***Four CSU  
campuses we  
visited have  
removed only 11  
percent of physical  
barriers  
identified.***

As shown in Table 2, approximately \$15 million in architectural barriers was identified for priorities 1 through 3 at the four CSU campuses we visited. As of October 1, 1995, the four campuses have spent approximately \$1.6 million on projects to remove architectural barriers on their respective campuses. During the 28-month period from May 1993, when the transition plan was completed, through October 1, 1995, the four CSU campuses have completed only approximately 11 percent of the removals necessary to comply fully with the ADA.

***Table 2  
Comparison of the Estimated Costs of and  
Actual Amounts Spent for Removing  
Architectural Barriers at Four CSU Campuses***

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<b>Campus</b>	<b>Estimated Cost to Remove Priority 1, 2, and 3 Architectural Barriers Identified</b>	<b>Actual Amount Spent to Remove Architectural Barriers <sup>a</sup></b>
CSU Dominguez Hills	\$2,002,180	\$697,000
CSU Sacramento	4,911,175	137,220
CSU Stanislaus	1,382,975	106,094
San Diego State University	7,008,755	679,392

<sup>a</sup> These amounts may also include dollars spent to correct priority 4 barriers, which include all other miscellaneous measures necessary to provide full access.

Source: Individual campuses provided this information.

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***CSU campuses cite limited minor capital outlay funds as reason for slow progress in removing barriers.***

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According to a June 8, 1993, memorandum from the Chancellor's Office, the CSU system's ability to remove the identified barriers depends on the availability of capital outlay funding allocated through the state budget process. Furthermore, most CSU campuses cited limited minor capital outlay funds allocated by the Chancellor's Office to the individual campuses as the primary reason for the slow progress in removing architectural barriers. The minor capital outlay funding is allocated to individual campuses based on total student enrollment. For fiscal year 1994-95, however, because

of the failure of a general obligation bond proposal, the Chancellor's Office did not allocate any minor capital outlay funds to the individual campuses.

Although the CSU campuses receive a limited amount of minor capital outlay funds, each campus could take additional actions to obtain other sources of funding. For example, the Donahoe Higher Education Act requires each public institution to use other available resources to support programs and services for students with disabilities. These other available sources of funding could enhance a campus' ability to comply with the ADA. For example, the Department of Rehabilitation offers grants to campuses that can be used to provide a variety of services associated with operating high-tech centers, such as purchasing adaptive equipment and providing additional support staff to assist in training students. In addition to obtaining funds from other sources, the campuses could use physical plant staff members to remove some of the barriers as a minor project or maintenance item to reduce the cost of construction that would be charged by a private contractor at prevailing rates. In fact, the consultant hired by the Chancellor's Office to complete the transition plans recommended this action to the campuses.

However, as a result of the limited funds available from the Chancellor's Office minor capital outlay allocations and the limited amount of campus funds committed to ADA projects, the CSU campuses we visited have not resolved a substantial portion of the barriers identified in their transition plans.

### ***Many of the Barriers at the Two UC Campuses Have Been Removed***

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***UCLA has removed more than 60 percent of physical barriers identified.***

The UCLA campus identified more than \$21 million in architectural barriers that should be removed to comply fully with ADA in its transition plan submitted by the federal deadline of July 26, 1992. This total encompasses barriers that have been prioritized as 1 through 5. As of October 1995, UCLA has removed more than \$12.5 million, or 60 percent, of the identified architectural barriers. One reason for UCLA's success in removing barriers relates to UCLA's administrative methods for achieving program accessibility. These administrative methods involve unique funding options, such as the Reasonable Accommodation Program. This program allows for matching funds from the campus Chancellor's Office to assist departments in making the required worksite adjustments. In addition, the facilities management department has set aside funds in its own internal departmental budget to specifically address ADA structural modifications as requested by the campus Chancellor's ADA Compliance Office.

Further, UCLA uses several different funding sources rather than relying only on minor capital outlay funds allocated through the state budget process to improve accessibility. These sources include but are not limited to the UCLA chancellor's discretionary funds, parking reserves, housing reserves, university funds, gifts, and state major capital improvement funds.

**UC Davis has removed more than 70 percent of identified barriers.**

Similar to UCLA, UC Davis also prepared a transition plan by the federal deadline of July 26, 1992. To prepare the plan, the university ADA compliance officer worked with a team comprised of the Campus Budget Planning Office, the Facilities Department, and various faculty and staff members. The team used the ADA Access Guide and the Office of the President's "Guidelines for Facilities Compliance with the Americans with Disabilities Act" to assist in identifying architectural barriers. In addition, the team prioritized the barriers on a scale of 1 to 4; the highest priority receives a ranking of 1 and the lowest priority receives a ranking of 4. After prioritizing the barriers, the team used the ADA Access Guide to estimate the costs involved with removing the barriers. As a result, the team identified total architectural barriers at an approximate cost of \$1.1 million. As of October 1995, UC Davis has removed approximately \$767,000, or 70 percent, of its architectural barriers.

### **Conclusion**

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Most of the campuses we visited provide students with disabilities with access to computer equipment and software; however, at two CSU campuses, we noted conditions in which students' access to facilities that have adaptive computer equipment may be impeded. In addition, we noted that although the campuses have established guidelines to address the needs of students with disabilities, not all the campuses have complied fully with the ADA. Specifically, one of the four CSU campuses we reviewed has not completed a self-evaluation as required by the ADA. In addition, one CSU campus' self-evaluation did not adequately address the elements required by the ADA Technical Assistance Manual. Finally, progress to remove physical barriers that may deny access to disabled students has been slow at the four CSU campuses.

## ***Recommendations***

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To ensure that students with disabilities have access to computer equipment, the Chancellor's Office should do the following:

- Instruct CSU Sacramento to remove the library barrier as soon as possible and provide alternative means to ensure accessibility while the barrier is being removed;
- Instruct CSU Stanislaus to train computer lab staff members to use current adaptive equipment and to either expand the hours of the disabled student services office or purchase additional adaptive equipment that can be placed in an open computer lab; and
- Encourage CSU Stanislaus to consider applying for grant funds that are available from the U.S. Department of Rehabilitation. The grant funds could be used to purchase adaptive equipment and provide additional staff members to assist in training students with disabilities to use the adaptive equipment.

To ensure that all areas of noncompliance with federal laws are identified, the CSU Chancellor's Office and the UC Office of the President should ensure that all campuses complete self-evaluations as soon as possible and address the elements outlined in the ADA Technical Assistance Manual when completing their self-evaluations.

To ensure that the campuses quickly remove all architectural barriers identified in the transition plans, the CSU Chancellor's Office and the UC Office of the President should instruct all campuses to look for alternative sources of funds, such as campus funds available in the facilities departmental budget, to pay for the barrier removals.

We conducted this review under the authority vested in the state auditor by Section 8543 of the California Government Code and according to generally accepted governmental auditing standards. We limited our review to those areas specified in the audit scope section of this letter report.

Respectfully submitted,

KURT R. SJOBERG  
State Auditor

Staff: Elaine M. Howle, CPA, Audit Principal  
Catherine M. Giorgi, CPA  
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# **Appendix A**

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## **California State University Disability Categories**

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<b>Disability Category</b>	<b>Description of Disability</b>
Visual limitation	Blindness or partial sight to the degree that it impedes the educational process.
Communications disability	Limitation in the processes of speech and/or hearing that impedes the educational process. Students in this category do not require interpreters.
Deaf	Limitation in the process of hearing. Students in this category require oral or sign language interpreters.
Mobility limitation	Limitation in locomotion or motor functions. Included in this category are persons who have asthma, have cardiovascular problems, or do not have the motor functions necessary to lift or carry items used in an academic setting.
Learning disability	A generic term that refers to the heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning, or mathematical abilities. These disorders occur in persons of average to superior intelligence and are presumed to be attributable to central nervous system dysfunction.
Other functional limitation	Any other dysfunction of a body part or process that necessitates the use of supportive services and that does not fall within the categories listed above.

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Source: California State University, Policy for Provision of Services for Students With Disabilities, January 1989.

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# ***Appendix B***

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## ***University of California Disability Categories***

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<b>Disability Category</b>	<b>Description of Disability</b>
Visual impairments	Blindness or partial loss of sight. Condition may be permanent or temporary and include low vision, glaucoma, cataracts, and lazy eye.
Hearing impairments	Students in this category exhibit a variety of communication styles, such as lip-reading and distinguishing between sound and no-sound.
Mobility impairments	Includes disabling conditions that manifest in a serious limitation in locomotion or motor functions. Common types include multiple sclerosis, cerebral palsy, amputation, juvenile rheumatoid arthritis, and paraplegia.
Other functional impairments	This category includes a wide variety of physical and psychological impairments and medical conditions not classified in the other disability categories, such as acquired brain disorder, lupus, leukemia, carpal tunnel syndrome, diabetes, chronic fatigue syndrome, epilepsy, and attention deficit disorder.
Specific learning disabilities	A heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning, or mathematical abilities.

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Source: University of California, Davis Resources for Students With Disabilities Handbook, September 1995.















Text Modified

Although the Department of Rehabilitation may not have funds currently available for high-tech centers, the campus should consider applying for grant funds in the future. Furthermore, as required by the Donahoe Higher Education Act, the campus should consider other available resources to support programs and services to students with disabilities.



