Introduction

The evaluator was invited to visit the campus to assess the delivery of services and support to students, progress made in creating a more accessible campus, capacity to respond to future challenges and to make observations about physical accessibility/facilities. This report will be accompanied by a phone conversation with the President and the Chief of Staff. The evaluator spent three days on campus meeting with numerous constituents and reviewing a significant amount of print and web-based information.

Grinnell College has developed a unique, decentralized approach to not only addressing accessibility and accommodations for individual students, but to improving the campus as a system. As a result, the campus has achieved much more than what is typical of many campuses. Now, it is important to take the next step towards improving the support of both individual students and faculty, while continuing to address the systemic barriers and access issues for the campus as a whole.

This report is organized as follows. An Executive Summary is first followed by a series of findings by major topic areas. Each topic area’s findings are followed by a summary of strengths, challenges and recommendations. Two documents are appended at the end, with suggestions for minor editing (word changes).

Executive Summary

In 2013, a host of Student Affairs organizations published a new edition of its “Council for the Advancement of Standards in Higher Education” (CAS) and collaborated with the Association on Higher Education and Disability (AHEAD) to develop new standards for Disability Resources and Services (DRS). These standards are to be used in the “design and assessment of programs and for staff training and development”.

In the introduction to the new Disability Resources Standards, the following noteworthy statements are found (paraphrased below):

“Professionals who serve students with disabilities have played a key role in expanding access to college and university environments. Postsecondary offices are transitioning from a strict compliance model to a resource-oriented model. These offices vary in size. AHEAD’s guidance is that each campus must have appropriate levels of full-time professional staff. Rarely can this be accomplished by one person”.

Grinnell College: External Evaluation – Disability Resources and Accessibility
Conducted by Tom L. Thompson, Evaluator / Site Visit: May 13 – 15, 2014
Further, the mission of Disability Resources and Services (DRS) is “to provide leadership and facilitate equal access to all institutional opportunities for students with disabilities”. To accomplish its mission, DRS must perform three duties:

1. “Provide institution-wide advisement, consultation and training on disability-related topics, including legal and regulatory compliance, universal design, and disability scholarship”.
2. “Collaborate with partners to identify and remove barriers in order to foster an all-inclusive campus”.
3. “Provide individual services and facilitate accommodations to students with disabilities”.

Grinnell College has done an excellent job of working on all three of these areas of the DRS mission, particularly the second and third parts. Now the opportunity exists to strengthen the provision of individual accommodations and to conduct a thorough, multi-year effort of training and consultation.

Three core staff have each dedicated part of their time to facilitating significant changes on campus. They have collaborated with one another and with many other campus partners. They have each earned the trust and gratitude of students whose education has been made more accessible. In addition, Grinnell has made strides in recognizing and embracing disability as a part of the human experience and as an important part of campus diversity.

Grinnell’s future holds opportunities to continue building a more inclusive culture while reducing barriers to learning and involvement. Some of the biggest challenges ahead will be technological, as well as pedagogical. It is laudatory that Grinnell has invited students to play such an active part in shaping and changing the campus environment.

**Key Recommendations** (others are included in the body under each major topic)

1. **Make accessibility a major, strategic theme in 2014 – 2015** as was done recently for Title IX. Particular emphasis should be given to digital accessibility and to Universal Design for Learning (aligns with College’s strategic goal about adaptive curriculum and pedagogy).
2. **Create a full time position, Coordinator of Disability Resources**, within Student Affairs that reports to the Dean for Student Success and Academic Advising, Joyce Stern.
3. **Create a faculty/staff team to develop a “curriculum of topics”** that are related to advancing accessibility and Universal Design for Learning. This curriculum would be used to create materials and methods for a variety of training events and forums.
4. **Allocate space for additional accommodated testing and for assistive technology/alternate media production** – a lab with a private office, available to students and employees.
5. Include an “accessibility review” into all future remodeling and new construction and into the procurement and pre-launch of all new web or computer based systems.

6. Finalize and publish a Grievance procedure for complaints related to the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.

Findings by Category including Strengths, Challenges and Recommendations

I. Operations and Student Support

A. Students Supported: Percentage of Grinnell students using Disability Resources has grown from 3.37% five years ago to 4.78% in FY 13. If this same growth pattern continues, in FY 18 the percentage will be 6.16%. The trend in most higher education institutions, even those with declining enrollment, reveals the increasing enrollment of students with disabilities. Of particular note is the fact that the fastest growing populations of students are those with invisible disabilities, particularly those with psychological disabilities or chronic/systemic health problems. These students are at higher risk of significant setbacks and of withdrawing from college. Students with psych disabilities grew 100% (from 13–27) from 2011-2012 to 2012-2013 at Grinnell.

B. Coordination of Accommodations for students: Joyce Stern, the lead person, is supported by Ann Isgrig and by Autumn Wilke (volunteer from Res Life since January 2014). None of these individuals has “support for providing accommodations” listed in their job descriptions. They interact with Angie Story about assistive tech and alternate format materials and they also consult with Jennifer Krohn about accessibility issues. Plus, Joyce manages seven areas of support and provides direct support to students with disabilities. All staff involved directly with students are feeling “strained” in performing their multiple duties.

The space for accommodated testing is limited to a single room, so most accommodated testing is done by faculty (under conditions with little proctoring). This single room is used for other purposes, so it is some times not available. Ann assists with testing in the Student Affairs office.

The process of setting up individual assistive tech support and coordinating materials in alternate format, i.e. digital audio or large print is managed by Angie. Research on vendors who could do captioned videos has been started. An internship study done by Hernandez in 2012 recommended the following and I concur:

- The establishment of a separate budget for assistive tech support inclusive of hardware, software and funds for professional development of the staff.
C. **Process, forms and data management**: Joyce or Autumn conduct initial interviews with students. A second interview occurs with an advisor present. This insures consideration of disability-related factors in course selection. Most record keeping is managed with paper files. The forms used with students (new student letter, disclosure form, initial interview, accommodation form are generally well designed (suggestions for minor changes are in the attachments). A grievance procedure for students with disabilities (related to the Americans with Disabilities Act and Section 504) was not found, but a task force is working on developing a procedure – status unknown? Completion of this task is critical as it is a federal, legal requirement to have a posted process.

It appears that reports about students and services must be generated through manual tabulation. The 2012-2013 report that was reviewed was well developed, but would be labor intensive done manually.

Referrals to Angie, for assistive tech and alt media support are usually by email. The lack of a private space with access to hardware/software for demonstrating use of assistive tech/alt media and where confidential conversations can occur is a deficit. Next year, a student who is blind will enroll. It appears there will be a need to purchase a quality Braille embosser and possibly a tactile graphics device (PIAF – Picture In a Flash).

**Strengths**

- The three core staff involved in student support and campus access, Joyce, Angie and Jennifer have a positive, productive relationship.
- The three core staff each provide robust, individual support to students.
- There has been an institutional commitment to improving access.
- Joyce and a faculty member in who teaches Disability Studies, are investigating ways to reframe disability as a human difference/experience for Grinnell.

**Challenges**

- Joyce’s growing work with students with disabilities has taken time away from her primary responsibilities: student success and advising.
- Annual planning and assessment for Disability Resources.
- Staff need more professional development on advising and on disability-related topics, particularly how to implement best practices with students who have chronic health conditions (psychological, systemic, physical)
Recommendations

- Create a full time position, Coordinator of Disability Resources, within Student Affairs that reports to the Dean of Student Success and Academic Advising.
- Investigate and purchase a comprehensive database for Disability Resources, such as AIM or Clockwork. These systems integrate with the College’s ERP.
- Provide professional development opportunities, as a part of the 2014-2015 strategic theme on Accessibility, for faculty and staff.
- Consider the use of GA’s (Graduate Assistants) to work with the Joyce and Angie – great learning experience for students and less expensive way to increase support to students.
- Designate three rooms to do accommodated testing.
- Write “support for students with disabilities” into the job descriptions of all staff that are actively involved in providing support, if not currently included.
- Make minor changes in language for current forms. Review current documentation requirements to place greater emphasis on self-report and former use of accommodations. Except for conditions that are variable or progressive, a history of having a disability and use of former accommodations should be a key factor in determining current accommodations.

II. Accessibility (physical, communications and digital) findings

A. Facilities improvements – the Grinnell College video shown at a 2012 Town Hall meeting is an outstanding visual overview and tribute to the tremendous work done since 2008 to improve campus accessibility. The College made a major commitment to accessibility by incorporating accessibility into its strategic plan and followed by designating a position for ADA Compliance, a role held by Jennifer Krohn. The College also allocated funds for six years to address these access issues. The evaluator reviewed Accessibility Committee minutes from 2008-2009 to the present and other progress reports provided by Jennifer. The list of issues addressed is impressive and includes:
   a. Developed a “building grading system” to determine areas that needed improvement.
   b. Conducted two accessibility audits using an outside evaluator and created checklists to address specific access features.
   c. Purchased an accessible van.
   d. Implemented new types of assistive technology
   e. Reviewed policies and procedures
   f. Added new access features: auto door openers, ramps, pool stairs, others
There are some major challenges remaining, including the Forum building (and the inclusion of important services there including, Info Technology and Health & Counseling), and the ARH/Carnegie buildings. It was reported that Jennifer is not involved in the review of plans/drawings for new buildings or remodeling. Including her would lead to greater accessibility and usability.

A few physical access issues noticed by the evaluator include:

- Most of the tactile warning pads at crosswalks were worn out
- Some stairwells (in ARH for example) don’t have hand rails on both sides and some handrails don’t meet code (not able to be easily grasped)
- Way finding signage, particularly in the interior of the campus, is not present. It is difficult to find accessible entrances until you are at an entryway.

B. Web and Digital accessibility - Some work has been done and is in process regarding web and digital accessibility but much remains to be done. Staff from IT and College Communications expressed a strong interest and commitment to improving access. Despite attempts to re-design the College’s web site, the level of accessibility is still not desirable. Faculty have received some training on how to create accessible documents and on Universal Design for Learning.

C. Assistive Technology, Alternate Media Production and Universal Design - As noted earlier, in regard to specific student accommodations, the College does not have a designated space for demonstrating and training in the use of assistive technology and for the production of alternate media materials. This space should include a private area for confidential conversations (between Angie/her staff and students/faculty or staff).

The workflow used by Angie and her staff to produce alternate media is a best practice – scanning documents with OCR software then producing full structural documents, able to be converted into multiple formats. The assistive tech support staff use the LMS to gain access to curricular materials.

The evaluator is not clear if there are dedicated resources and staff available to work with faculty about creating accessible materials themselves and on incorporating Universal Design for Learning into their pedagogy. These practices provide benefits to all learners, inclusive of students with disabilities. Some colleges include this training as part of their instructional support for use of their LMS, i.e. Blackboard.
Strengths

- The planning and advancements achieved for physical/facilities access are highly commendable! The scorecard process was innovative & effective. The video overview is excellent, as is the active participation of students.
- The Accessibility Committee works effectively setting annual goals, working collaboratively, tracking its progress and reporting its accomplishments.
- Angie Story (previously Karen M) and her staff are doing commendable work.

Challenges

- Angie does much of her one to one student work in a location utilized by others who are in and out, making this a non-confidential location.
- The College’s web page is not currently accessible and the usability is not at a desirable level. The accessibility of other College web resources is not known.
- How to address access challenges posed by services in the Forum: Health and Counseling, IT and the proposed Teaching & Learning Center? Access challenges in the ARH, especially the IT Labs.

Recommendations

- Change Jennifer Krohn’s job title to make reference to her ADA Compliance role.
- Include Jennifer in an accessibility/usability review of all remodeling and new construction.
- Designate a dedicated space for assistive technology training and alternate format production, that will be available to students, faculty and staff.
- Determine the College’s capacity for producing Braille materials. Make contact with preferred vendors who can produce Braille, Math Braille and captioning (both live for classroom and video closed captioning).

III. Interview with students and faculty

A. Students – a survey was done in 2011 using Survey Monkey. Some key findings in this survey follow:
   a. 39% of students who responded were “diagnosed” with a disability while at Grinnell versus 50% who enrolled with a diagnosed disability.
   b. Most frequent accommodations used included extra time for testing, priority seating, use of computers in class, getting materials from faculty in advance and
Note taking. Note taking was cited as problematic—didn’t always get set up nor function well when it was set up.

c. Students commented as follows: first, there needs to be more communication between SHACS, ITS, Stu Aff’s, Housing/Dining about accommodations and second, faculty should have more training on disability and how to make instruction more accessible

Comments and suggestions from interviews with students

Support for students should be more centralized in one office and coordinated by a staff member with this as a primary responsibility.

A grievance/complaint procedure is needed. One student cited how difficult it was for her to resolve access barriers she encountered.

There should be campus-wide access to assistive technology (network based).

The process for obtaining support is not clear or streamlined. Access to counseling is difficult, wait two weeks for first and second appointments.

Student Accessibility committee should be attached to Accessibility Committee.

Residence Life staff are great and are well trained.

Dining staff were friendly and responsive to my request but didn’t resolve it.

Disclosing about one’s disability is difficult—described it as the “burden of disclosure” and that some faculty act as if “guilty till proven innocent”.

B. Faculty group meeting—below are key comments and suggestions from faculty

a. The College should have a major emphasis on disability accommodations and accessibility next year, like was done for Title IX.

b. Don’t always understand their role about accommodations. Why do they facilitate so much of the accommodated testing and note taking?

c. Have questions and concerns about how to handle students with chronic medical or psychological conditions (miss classes, exams).

d. They want more training on how to deal with accommodations when essential skills are being assessed.
Strengths

- Students are primarily very positive about Grinnell and are appreciative of the accomplishments in improving accessibility.
- Faculty are very positive about the core staff that work to provide resources and access to students with disabilities.

Challenges

- How to design and deliver education and training related to disability access and accessible pedagogy that can be offered in a variety of formats/lengths: face to face and online, brief overviews and in-depth workshops, handouts and web-based information?
- How to best address the related issue of students’ disclosing their need for classroom accommodations and faculty’s desire to understand their role better?

Recommendations

- Create a collaborative team of developers to generate a list of the most important topics for further education and then begin creating materials and methodologies for varied delivery.
- Launch a parallel initiative to teach faculty about Universal Design for Learning and incentivize some to become trainers of other faculty – a train the trainer model. This could be a project for the Teaching and Learning Center and it aligns with the College’s strategic goal about having an adaptive curriculum & pedagogy.
- Hold a joint meeting with representative faculty and the core staff working with students with disabilities to discuss implementation of classroom and course-based accommodations (examples: note taking, attendance flexibility, getting course materials in advance, testing accommodations). What is working? What is not working? Discuss and define the roles of Disability Resources, students and faculty.

IV. Organizational Structure, Communication and Decision Making - findings

A. Comments and suggestions from interviews
   a. The College has moved to a model of continuous strategic planning and distributed leadership, involving teams lead by a faculty member and an administrator. This is a terrific, collaborative model.
b. Vice President Jim Reische is committed to ensuring that the College’s web page will be accessible to users with disabilities and plans to do a rigorous access review. The level of accessibility for the College’s ERP and portal is not known? How can this assessment occur?
c. The campus is highly supportive of professional development for individual staff both on and off campus, supporting individuals to attend conferences and workshops for additional education.
d. Someone stated that the non-discrimination statements in the catalog and on the web are not consistent?
e. There are individuals engaged in diversity work that is inclusive of disability and related identity issues.
f. Addressing mental health and psychological issues is an area of concern important to students and employees.
g. The web information on the Academic Advising page – listing of helpful documents – is very beneficial as are the introductions to staff (including personal elements).
h. How is the learning outcome of “becoming a more effective self advocate” assessed? Is it a one time measurement or done over time to register changes in skills? Are all students assessed for this skill or just students with disabilities?

Strengths

- The College is committed to continuous improvement and to creating a equitable and diverse environment

Challenges

- Several individuals cited concerns over how to address mental health and psychological issues in students in employees. How can this be addressed in a small town, small college environment? What are the key issues?

Recommendations

- Make a concerted effort to integrate an access review into all web-based systems: at purchasing and before launching them. Then plan for work-arounds (other means of providing access or accommodations) where known barriers cannot be easily overcome or removed.
• Convene a short-term task force to identify the key issues about mental health and psychological well being that are being expressed on campus. Use these identified issues to determine some first responses – easily achievable changes.

Attached to this report are two separate documents used with students – with suggested comments/edits noted