**Disability and Accessibility at Grinnell College:
Current State and Future Recommendations**

*Report of the Disability and Accessibility Task Force 2014-15
submitted to President Kington June 18, 2015*

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I.   Executive Summary

The Disability and Accessibility Task Force was formed in fall 2014 to study issues of disability and accessibility as a strategic, cross-cutting theme. Diversity is a core value of Grinnell and central to meeting our mission. This diversity includes academically-talented people who have disabilities. Disability – an umbrella term – is representative of a wide range of disability categories and individual experiences.

The Task Force presents the following report to provide general background about the broad range of obligations and opportunities related to disability and to provide recommendations to support a lively academic learning and working environment for all students, employees, and visitors.

This report organizes its recommendations as follows:

1. Raising campus awareness about legal obligations and individual rights and about creating an inclusive learning and working environment.
2. Designing a campus environment that is seamlessly accessible to our faculty, staff, students, and visitors, including digital, programmatic, and physical dimensions.
3. Effectively accommodating students, employees, and visitors with disabilities.

We highlight the following recommendations which we believe will have the greatest impact on creating an inclusive working and learning environment.

- Implement regular training for faculty and staff to understand and meet our legal obligations regarding access for people with disabilities and to remove barriers to our educational environment: curricular, co-curricular, and workplace.
- Develop materials and a process for organizers of extracurricular and College-sponsored activities to meet our obligation to make events and programs accessible.
- Create a policy and procedures for the assessment, procurement, remediation, and design of our digital content (e.g., web, curricular materials) and digital tools (e.g., software, hardware).
- Continue to remove barriers in our existing physical environment, through design of new and renovation of existing spaces.
- Make information about the availability of accommodations for students and employees with disabilities widely available.
- Consider the accessibility ramifications as the College expands its global engagement and as it explores new ways of teaching with technology.

These recommendations serve to further develop a campus culture that is — implicitly and explicitly — positive and embracing of disability as a form of human diversity.

II.   Introduction and Charge of the Task Force

The strategic planning process of 2011-12 named six major components, including to "attract, enrich, and graduate a diverse and talented student community." Focusing on disability and accessibly aligns with this strategic direction and Grinnell's core value of diversity.

During the academic year 2013-14, President Raynard Kington hosted several "Listening Sessions" to hear about the issues most on the minds of students. He also hosted four Town Halls on topics chosen by the community. In addition, strategic planning launched a year-long discussion about diversity. From these many discussions, disabilities as an aspect of diversity and inclusion stood out as an issue deserving attention by the community and administration. In response, President Kington named disability and accessibility a strategic, cross-cutting theme for 2014-15.

In preparation for the work ahead, Grinnell hired Mr. Tom L. Thompson to review progress toward creating a physically and technologically accessible campus, delivering services to students, faculty, and staff with disabilities, and helping develop a plan for meeting future needs and requirements. Following a site visit on May 13 and 14, 2014, Mr. Thompson provided a report and recommendations to help guide Grinnell's next steps. In this report, he lauded the work that has been done by student affairs, the dean's office, and facilities to create an inclusive campus: "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."[1]

Mr. Thompson outlined several opportunities and requirements to develop more coordinated and comprehensive planning and response. His work was informed by a set of standards for offices on campuses that provide disability resources; these standards are published by the Council for the Advancement of Standards in Higher Education in collaboration with the Association of Higher Education and Disability.

Mr. Thompson wrote:

Further, the mission of disability resources is "to provide leadership and facilitate equal access to all institutional opportunities for students with disabilities."[2] To accomplish its mission, disability resources must perform three duties:

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[1] External Evaluation- Disability Resources and Accessibility. Report by Tom L. Thompson.

[2] Council on the Advancement of Standards in Higher Education. External Evaluation-Disability Resources and Accessibility, Tom L. Thompson

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.

Disability and Accessibility Task Force Charge

In light of the recommendations from the consultant and the concerns raised by campus community members, President Kington appointed the Disability and Accessibility Task Force. Task Force membership is listed in Appendix A.

The Disability and Accessibility Task Force was charged to develop a comprehensive response to serving students, faculty, and staff with disabilities.   Specifically, the Task Force was asked to:

1. Review recommendations of Tom Thompson and recommend to the president actionable items.
2. Work with Communications to develop an all-campus conversation about disability as a major, strategic theme in 2014-15.
3. Develop a training/educational program for faculty and staff on disability services.
4. Further develop and enhance policies and procedures consistent with Section 504 of the Rehabilitation Act, the ADA and other relevant laws.

To provide context for the recommendations, this report begins by presenting important terms and an overview of the legal landscape. It then turns to the three main foci: raising awareness, designing learning environments, and effectively accommodating individual needs.

The concept of universal design — as defined in the section below — informs the recommendations of the task force. Universal design principles encourage proactive thinking rather than retroactive accommodation. If a framework for considering people of all abilities is utilized during the design phase of projects, whether the project is designing a building or a syllabus, the need for accommodations after implementation can be minimized.

III.   Disability and Accessibility: Important Terms and the Legal Landscape

At institutions of higher education, such as Grinnell College, the term "disability" is used to refer to a range of individual or co-existing developmental, learning, physical, or psychiatric disabilities that cause individuals to experience functional impacts on major life activities within the College's learning, physical, or social environments. While we attempt in this report to be as inclusive in our language as possible, these categories of disability will certainly not reflect the wide range of ways that individuals experience disability. Some people will identify with the language of developmental, learning, psychological or physical disabilities used in this

report, some may identify as an individual whose disability spans multiple categories, and some may identify with language not represented here.

Within this document the following language will be used to discuss the work of the Task Force to further develop existing supports for people with disabilities in our campus community and to recommend ways to eliminate remaining barriers to access.

Individuals with Disabilities —places the importance or emphasis on the person rather than the disability itself, i.e., *person with a disability* rather than a *disabled person*. It is important to embrace person-first language in an effort to recognize disability as a category of identity for many individuals. It also helps to assert that the disability is a singular characteristic of the individual.

Developmental Disabilities — is broadly used to refer to a number of chronic disabilities which occur before adolescence including impacts on speech, motor function, executive functioning, etc. Developmental disabilities will usually be present for an individual's entire life and may have significant crossover of co-occurrence with other categories of disabilities.

Learning Disabilities — refers to specific disabilities that may impact an individual's academic performance when compared to their peers. These disabilities may affect writing, reading, or learning languages or math.

Physical Disabilities — refers to impacts that result from a limitation in stamina, mobility, dexterity, or physical functioning. Physical disabilities are often a result of a wide variety of injuries or health conditions.

Psychiatric Disabilities — refers to disabilities with a specific behavioral or mental health origin. This disability category includes many individual conditions such as OCD, an eating disorder, Major Depressive Disorder, and PTSD.

Neurodiversity — is the recognition that neurological differences are the result of natural variation in the human brain. These differences should be recognized and embraced as a form of diversity. Neurodiversity spans a number of differences labeled as learning, physical, and psychiatric disabilities.

Accessibility — the ease with which an individual can use a product, enter a space, or contact a person or organization. Accessibility is both a state of being (a building can be accessible) and a goal (a building should be modified to enhance accessibility). In addition to physical environments, social environments and conditions should be considered.

Universal Design — this concept, often used within architecture, is applied to create buildings, products, and environments that are inherently accessible for the greatest number of people including individuals with disabilities, the elderly, and individuals without disabilities. One commonly cited example is curb cuts in sidewalks.

Universal Design for Learning — is a set of principles for pedagogy and curricular development that derives from the broader idea of universal design. The goal is to create learning environments that allow the most number of students to learn and to demonstrate what they know.

Accommodations — refers to specific, individualized adaptations to a particular environment to provide fuller access to an individual. Examples of accommodations include access to assistive technology, the ability to record lectures or have an additional alternative format for learning material in addition to a lecture, or an interpreter or classroom assistant. Accommodations are determined on a case by case basis after analysis of the environment and the individual needs of a student. Accommodations should be arranged through the Disability Resources (part of Academic Advising Office) or through Accessibility Services.

Assistive Technology — is an umbrella term used to refer to assistive, adaptive, or widely-used technology that allows individuals with disabilities greater independence and autonomy in completing tasks. This technology can include devices such as scooters, braille embossers, text to speech software, modified keyboards, and much more.

Accessibility Services — Accessibility Services at Grinnell refers to the work of Jennifer Krohn in providing accommodations to employees and visitors to campus as well as her work in reviewing large scale accessibility issues on campus. Beginning in 2008, Jennifer also convened and continues to chair the Accessibility Committee.

Disability Resources — Disability Resources at Grinnell refers to the work of Autumn Wilke in the Academic Advising Office. Disability Resources provides academic, residential, and dining accommodations to students and coordinates educational efforts on campus.

Assistive Technology Office — The Assistive Technology office refers to the work of Angie Story and her team who help provide access to and on-going support for assistive technology software and devices.

Institutions of Higher Education have an obligation under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act Amendments Act of 2008 to provide equal access to the college environment to students with disabilities as is available to their peers. Many states have also begun to adopt standards from Section 508 of the Rehabilitation Act — which currently requires federal agencies to be fully e-accessible — for institutions of education. While Iowa has not yet created a state policy, Grinnell College should consider adopting these standards in advance of a legal mandate. This equal access can be provided by implementing universal design in the construction of both physical and learning environments as well as through reasonable accommodations coordinated through Disability Resources.

In addition to Section 504 and the ADAAA, the obligations of institutions of higher education are also informed by recent and on-going case law. The ADAAA is a civil rights law and the intent of the law is to provide equal access. However, because it is a civil rights law and not a statute, many areas are left up to interpretation; further guidance is provided by the courts.

Recent court cases and settlements reveal five primary areas of litigation and institutional risk: 1) teaching and learning, 2) dining services, 3) web accessibility, 4) removal of architectural barriers, and 5) assistive or adaptive technology. These court cases, listed below, have informed the work of the Task Force. They provide specific guidance for institutions and should continue to be reviewed by College administrators.

Teaching and Learning:

- Louisiana Tech (DJ 204-33-116, July 23, 2013): Louisiana Tech agreed to adopt the WCAG 2.0 Level AA standards for accessible web content and technology. The institution also agreed to train instructors and administrators on the requirements of the ADA. A large portion of this case focused on the instructor's use of inaccessible materials and failure to provide effective accommodations.
- EdX massive open online courses (MOOCs) (DJ 202-36-255, April 2, 2015): edX Inc., created by MIT and Harvard, agreed to conform to WCAG 2.0 AA guidelines and to ensure that its content management system for online courses is fully accessible. It also agreed to create guidance for creating accessible online courses and to appoint a web accessibility coordinator and conduct web accessibility training for employees responsible for the website, platform, and mobile applications of online courses.

Dining Services:

- Lesley University (DJ 202-36-231, December 20th, 2012): This settlement required Leslie University to make modifications to their existing dining preparation and consumption facilities to provide accommodations for individuals with Celiac. Specifically the university had to have a designated preparation space to prevent cross contamination and had to provide a dedicated dining area for diners with allergies.

Web Accessibility:

- Dear Colleague Letter: Effective Communication (November 2012): This letter is specifically targeted to the K-12 education system; however, it has been interpreted by many disability rights advocates to apply to higher education. Additionally, there are several recent cases (see below) that focus on communication and technology in the post-secondary setting.
- Louisiana Tech (DJ 204-33-116, July 23, 2013): see the case above under teaching and learning.
- South Carolina Technical College System (OCR 11-116002, February 28, 2013): This resolution required SCTCS to ensure that all web materials were accessible to individuals with visual disabilities.

Removal of Architectural Barriers:

- Mills College (DJ 202-11-192, January 15, 2013): The College was required to "remove architectural barriers in existing facilities where such removal is readily achievable" (cost

was not considered to be a substantial factor in what was deemed achievable) and to ensure that all new facilities were in compliance with the ADA including the 2010 standards.

Assistive or Adaptive Technology:

- [Dear Colleague Letter: Effective Communication](#) (November 2012): see the case above under web accessibility.
- [University of California-Berkeley](#) (May 7, 2013): Berkeley agreed that as part of this settlement instructors are required to submit textbook adoptions at least seven weeks prior to the start of class, and if they do not they are subject to referral to the vice provost to consider if misconduct has a occurred. [[Higher Education Opportunity Act;](#) see Sec. 112. Textbook information]

IV. Raising Awareness and Educating the Campus Community

A well-designed, campus-wide awareness and training program will promote a more inclusive learning environment for students and will strengthen Grinnell College's commitment to diversity. Building the awareness of faculty, staff, and students about disability will help create an environment where individuals are comfortable and knowledgeable during their interactions with people who have disabilities. Moreover, raising awareness contributes to a campus culture that is welcoming of and responsive to people with disabilities. The Task Force provides the following recommendations concerning how to approach these issues.

Recommendation 1.1: Training About Legal Responsibilities

Faculty:

Provide greater support and on-going education for faculty to facilitate their compliance with the law and fulfill teaching and learning goals.

a. Create required all-faculty disability training, offered annually. This will include federal and state regulations, Grinnell College accommodation procedures, use of assistive technology, and ADA/universal design principles in and out of the classroom, along with disability etiquette, and mental and emotional disability issues, specifically. Faculty will have follow-up training every three years to stay current on any regulations, policies, and best practices concerning students with disabilities. Additionally, provide the same disability training session during the new faculty orientation each fall. This might be folded into a set of know-your-rights related opportunities.

b. Provide opportunities for ongoing training to faculty, individually or in small groups, to inform curricular development, pedagogy, and implementation of accommodations to a growing population of students (e.g., during Faculty Fridays, community times, and/or at department or division meetings).

c. To facilitate ease in implementing academic accommodations for students, create a comprehensive guide that outlines policies, procedures, resources, and best practices for faculty.

Staff:

Provide greater support and on-going education for staff to facilitate their compliance with the law and meet operational goals.

a. Create mandatory all-staff disability training. This will include federal and state regulations, Grinnell College accommodation procedures, and ADA/universal design principles in the workplace, along with disability etiquette, and mental and emotional disability issues, specifically.
b. Create tailored training opportunities and resources for various departments to meet unique needs. For example, dining staff needs more information on food allergies and signs of allergic reaction, security officers and staff need more information concerning invisible disabilities, IT department staff need more information responding to the specific needs that arises in the technology area, Admission staff need more information on interacting with people with disabilities, and NSO staff need training prior to orientation, especially in the area of insuring students with disabilities are included in all activities.
c. Ensure that Facilities Management staff regularly review national standards for construction and renovation of buildings such as:
    - ADA American with Disabilities Act 1990 http://www.ada.gov/2010_regs.htm
    - ADA Design 2010 http://www.ada.gov/2010ADAstandards_index.htm
    - ABA Architectural Barriers Act of 1968 http://www.access-board.gov/the-board/laws/architectural-barriers-act-aba
    - NFPA National Fire Prevention Association 2012 standards http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=101
    - ICC ANSI American National Standards Institute 2013 http://publicecodes.cyberregs.com/icc/ansi/2009/a117p1/index.htm
    - IBC International Building Code 2012 http://publicecodes.cyberregs.com/icod/ibc/2012/index.htm

Student Leaders:

Offer annual disability training for residence life student staff, SGA, and campus tour guides employed by Admission. This training shall include legal compliance for making events accessible, disability etiquette, information about specific mental or emotional disability issues, and assistive technology (e.g., Kurzweil, Read & Write Gold, induction loops, Braille, captioning).

Recommendation 1.2: Know Your Rights Training for Students with Disabilities

Provide education for students with disabilities about their rights and availability of resources. This training should include a detailed review of Grinnell's accommodation processes and policies and of federal and state regulations that support them, advocacy, and how to handle accommodation issues that arise. This training should be provided at NSO and again during the semester for students with disabilities already enrolled.

Recommendation 1.3: Education about Mental Health and Hidden Disabilities

Provide on-going programming campus-wide that reduces stigma about mental health issues and other forms of invisible disabilities. This programming would address explicit and implicit bias.

V.   Designing Learning Environments

As described in section III, universal design is a philosophy that promotes developing programs, materials, and spaces that work for everybody. It is a lens through which one plans programmatically and physically. Many examples of ways we can utilize the principles of universal design on campus — within curricular and campus programs, technology systems, and physical spaces —are outlined below. These recommendations outline ways to make environments more accessible and welcoming.

Programmatic accessibility includes instructional design in the classroom, systems to access education such as admission and registration, as well as co-curricular programming that takes place throughout campus.

Recommendation 2.1: The Classroom

Provide accessibility in the Grinnell College classroom. The National Center on Universal Design for Learning outlines principles to guide the design of educational programs: Principles I: provide multiple means of representation; Principle II: provide multiple means of action and expression; Principle III: provide multiple means of engagement.

- Develop a guide for resources on campus and online that will help faculty with designing accessible courses
- Provide models to faculty on course planning for universal access including accessible syllabi and fully accessible class and library materials.
- Develop a course accessibility checklist for instructors.
- Require the inclusion of a standard ADA statement in all syllabi.
- Make auxiliary aids (e.g., recording of course materials and closed captioning) readily available in all classrooms when needed.

- Engage faculty through workshops on variable forms of assessment designed to gain an accurate view of student learning and minimize forms of assessment that are irrelevant to course learning goals or only measure student accountability.
- Conduct occasional audits of instructional materials, course-related websites, and use of information technology to provide feedback to instructors.

Recommendation 2.2: Global and Online Learning

Given Grinnell's expanding global initiatives and new horizons in teaching with technology, Grinnell will be forming new partnerships and programs, both off campus and virtual. In the context of this exploration, consider accessibility and options for accommodations as primary criteria.

- Comply with federal requirements on the accessibility of College administered off-campus programs.
- Comply with digital accessibility standards in all online and tech-based learning environments (see digital section below).

Recommendation 2.3: The Admission Office and Programs

- Carefully investigate the accessibility of any and all applications used for admission to the College and for Admission Office programming. Resolve any accessibility issues identified during this exploration.
- Review and assure that all admission documents on grinnell.edu and GrinnellShare are accessible to all.
- Represent students with disabilities, when possible, in College publications.
- Remove clutter or extra furniture from offices and interview spaces so that people using chairs, scooters or guide dogs are fully accommodated.
- Give tours using a Hearing Loop compatible portable sound system for campus tours including a microphone for the tour guide and headsets for the visitors.

Recommendation 2.4: College-Sponsored Events

Review accessibility of Grinnell's extracurricular and College-sponsored activities, including student activities:
- Require that all-campus events be held in accessible locations and use the available hearing loop technology when public address systems are used.
  - College-sponsored picnics must include areas for power and manual wheelchair users.
- Develop a statement that is placed on advertising for campus events that provides contact information if accommodations are required for an individual to fully access the program.
- Develop a checklist for event hosts and organizers so that they may follow best practices for accessibility at campus events.

- Develop a guide for student leaders to review and modify programs and activities for accessibility and inclusion.
- Make large print (24 pt) copies of paper programs and other literature available at all-campus events.

Recommendation 2.5: Athletic Programs and Events

- Review, document, and create a plan for each varsity athletic and recreational program for inclusion of student athletes with disabilities.
- Review, document, and create a plan for usability and inclusion of persons with disabilities in athletic and recreation facilities.
- Review places with bleacher seating to provide wheelchair access and seating.
- Explore accessible parking for Pioneer Park (baseball).
- Explore and create a plan for the installation of induction loops in venues where athletic events are held including Darby Gymnasium (basketball), the Russell Osgood Pool and deck (swimming), Pioneer Park (baseball), the Darren Young '93 Track and Field Complex, Rosenbloom Field (football), Springer Field (soccer), the softball complex, and the tennis courts.

Digital accessibility is the next frontier. An inclusive and accessible environment to learn and work, requires that everyone — students, employees and visitors — can consume the information that is being communicated through digital materials.

A significant part of digital access includes the web, both public facing and internal. Landmark lawsuits have brought website accessibility into the headlines as the U.S. Department of Justice (DOJ) has recently brought suits against schools that do not provide accessible information. The Web Content Accessibility Guidelines (WCAG) 2.0 ensure that digital materials are accessible. Currently, only federal agencies must comply with Section 508, and WCAG is not the level of standard. However, recent settlements by the DOJ require public accommodations (which includes private institutions) to ensure that their websites are accessible to individuals with disabilities using the WCAG 2.0 Level AA standards.

Recommendation 2.6: Web

- Develop a policy that requires all digital content that is for use by students in any instructional setting and that which is available for public access to comply with WCAG 2.0 Level AA guidelines.
- Develop a plan to remediate issues identified during the assessment of existing web content and to move forward with new web development guided by our policy.

Recommendation 2.7: Technology Systems and Environments

- Audit existing technology systems to determine the current level of universal design. The AccessIT Information Technology in Education Accessibility Checklist is one tool that can aid in this assessment. Implementation and ongoing monitoring might be modeled on Temple University's Accessible Technologies Initiative.
- Develop a plan to remediate issues identified during the assessment.

Recommendation 2.8: Procurement of Software and Hardware

- Determine a College standard for the level of acceptable accessibility of hardware and software using provisions in the Voluntary Product Accessibility Templates (VPATs).
- Develop a procurement policy to ensure that hardware and software purchased in the future meet these accessibility standards.
- Create an inventory including the VPATs for each product, and maintain as new purchases are made.

Physical accessibility means that everyone has an equitable interaction with the physical campus environment. Our community aspires to provide an equitable experience for all by incorporating principles of universal design across our buildings and grounds. Facilities should accommodate multiple disabilities seamlessly. Examples of equitable access include:

- People can navigate through campus and buildings to intended destinations as well as to elevators, bathrooms, entrances and exits.
- It takes the same amount of time to travel from one spot on campus to another regardless if one walks, uses a chair, uses a cane, or uses a service animal.
- Elevators that are as logically positioned and placed in parallel to stairs. Entrances that lead clearly to hallways and egresses to sidewalks and pathways.
- Public facilities such as restrooms and water fountains are accessible regardless of mobility, size, strength, or disability.
- Every person can access bathrooms, bathroom stalls, and toilet paper in a manner that respects their dignity.

The College should enhance the physical accessibility of campus by removing barriers and designing new spaces to be accessible. This is a tall order; older buildings were not constructed with accessibility in mind. We have an opportunity with new construction. It is critical that accessibility be built from the inside out, throughout the building projects and from the beginning into the daily life of the building. An economic impact analysis of the ADA Standards for Accessible Design shows that making buildings accessible to all is the right thing to do and that it is less expensive with new construction than when renovating facilities.

Although there is significant knowledge and talent on our campus in the areas of disability and accessibility, the College should look for external expertise and partners, especially with

building design and ongoing legal compliance, as has been done in other important areas such as Title IX.

Recommendation 2.9: New and Renovated Spaces

- When planning new and renovated spaces, use accessibility as one of the primary design criteria. Be attentive to design elements, including:
  - bathrooms that are large enough for people on scooters to enter and use in the same manner as others;
  - access to entrances/exits and elevators that's equitable for persons with mobility impairments and those without;
  - accessible paths within buildings and between buildings on campus that's equitable for those with mobility impairments and those without; and
  - surfaces of new construction that enable those hard of hearing to hear without background noise or bouncing sound.
- Appoint a person (or persons) who is knowledgeable about accessibility to serve on the planning team for that project.
- Consider using the DO-IT Checklist for designing spaces that are welcoming, accessible, and usable.
- Conduct usability testing during planning and construction including testing by persons with a wide variety of different disabilities.

Recommendation 2.10: Wayfinding

Make wayfinding signage a priority of the campus planning and landscaping — both within buildings and point-to-point on campus. Consult with persons with various disabilities and multiple disabilities to conduct usability testing during planning and installation of signage.

Recommendation 2.11: The Forum

Given the Forum's central location in the academic quad and given the complete inaccessibility of the architecture of the building, prioritize making this location useable and welcoming for students, faculty, and staff. This building was studied for accessibility in 2010-11. (https://www.grinnell.edu/sites/default/files/documents/Final%20ADA%20Evaluation%202-9-11.pdf)

Recommendation 2.12: Areas of Refuge

Designate areas of refuge in all buildings on campus as places where persons can go and remain if they cannot get out of the building during an emergency. Some people with mobility impairments may not be able to exit due to an elevator not operating, power outage, and/or cell phone coverage out. In an emergency situation, emergency personnel will go to designated areas of refuge. Install emergency lighting in these places, if not already installed.

Recommendation 2.13: Facilities and the Physical Environment

The Accessibility Committee will annually prepare and submit a budget request to use the Building Maintenance & Equipment (BM&E) funding by providing a prioritized list, including projected costs in three categories: risk reduction projects; high-impact, low-cost projects; and projects that markedly and directly impact student life. Consider designating specific funds within BM&E for accessibility projects. (See Appendix 3)

VI.   Accommodating Needs of Students, Staff, Faculty and Visitors

Even when our environments are generally accessible, individuals with disabilities may still need accommodations — specific individualized adjustments that allow an individual to have full access to the campus physical, social, or academic environment. A qualified disability or accessibility staff member determines these adjustments. On our campus, Autumn Wilke, coordinator of disability resources, works with students to determine needs, and Jennifer Krohn makes those determinations for staff and faculty. For visitors, the hosting department or office assesses needs and implements accommodations on a case-by-case basis.

Disability Resources and Accessibility Services have policies and procedures in place that are comprehensive and robust. In the past few years many policies have been revised, so few substantial policy or procedure changes remain. However, the Task Force did find some areas related to distribution of information, maintenance of records, allocation of resources, and modification of existing processes that need addressing.

Faculty and staff who have disabilities do not know there is support for them; there is widespread lack of awareness that reasonable workplace accommodations are available on campus and how to access those. One of the reasons for the confusion is that, until very recently, information regarding accommodations for faculty, staff, students, and visitors was decentralized and disconnected on the website. In spring 2015, materials were consolidated on our external facing webpage in a more useable way for all.

There are several growing sub-populations of Grinnell students with disabilities on campus that require specific accommodations, such as for testing, dietary adjustments, and course load. These growing populations are straining the existing methods of addressing the needed accommodations; each category of accommodation will need procedural modifications.

Assistive Technology is charged with making classroom materials accessible for students. One of the barriers to meeting the needs of individual students occurs due to timing: many faculty members determine course materials just before classes start or while courses are in progress.

The following recommendations highlight areas of existing accommodation policies, processes and response protocols that are in need of adjustment or improvement or that are simply not currently being addressed.

Recommendation 3.1: Availability of Accommodations

Review information provided to faculty, staff, students, and visitors about the availability of accommodations for individuals with disabilities to ensure that it is clear and consistent. Materials should be readily available online, in offices, and in hiring and training processes.

Recommendation 3.2: Testing Accommodations

Create a process, designate spaces, and deploy resources for meeting the rising need for student testing accommodations. This might be done by utilizing a classroom or enclosed (underutilized) study location during mid-semester evaluation and finals' week as a testing location with divided cubicles and a proctor.

Recommendation 3.3: Digital Records

Investigate technology solutions for Disability Resources and Assistive Technology to create a comprehensive electronic database and student record management system that also includes functionality for secure file sharing and confidential storage of student psychological testing and other medical records. The consultant, Mr. Thompson recommended AIM and Clockwork as well-regarded tools that integrate well with higher education enterprise-wide computing systems and that automate many of the existing processes completed by hand or on paper to reduce the amount of information stored in paper files.

Recommendation 3.4: Dining Options

Having purchased Net Nutrition as the next step in accommodating students with dietary needs, further explore options for accommodating students in Dining Services with severe allergies to the eight major food allergens: milk, eggs, fish, shellfish, tree nuts, peanuts, wheat, and soybeans.

Recommendation 3.5: Definition of Full-time Student Status

Consider alternative definitions of full-time student for individual students who have significantly disabling conditions; revisit options for accommodations for these students. Consider accessible online and distance learning as options to foster student participation in the academic program. Revisit the implications of any changes in definitions to full-time enrollment, i.e., financial aid policies, housing policies, dining policies, other campus office policies, and federal regulations.

Recommendation 3.6: Classroom Accommodations

In order to implement accommodations in a timely way for students, faculty need to know as much in advance as possible if a student in their class requires academic accommodations. Given constraints related to student privacy and choice, explore ways to enhance the existing system that notifies faculty about students with disabilities in their courses. Such an

enhancement is meant to provide early notice and support for instructors to effectively accommodate these students.

Recommendation 3.7: Course Materials

Adhere to the federally-mandated timeline for identification and purchase of course materials to allow time to convert course materials into accessible formats for students with disabilities. The Higher Education Opportunity Act (HEOA) requires that course book information be made available to students before they enroll in a course (Sec. 112. Textbook Information. HEOA).

Recommendation 3.8: Event Accommodations

Neither campus hosts nor program planners are uniformly aware that they are responsible for providing accommodations to all attendees with disabilities, including visitors. Appoint a staff member or team of staff to serve as a resource for organizers of campus-sponsored events to ensure that organizers have the necessary information to provide accommodations when requested by an attendee. Then create clear procedures and training for event organizers about implementing accommodations.

VII. Appendices

Appendix A: Task Force Membership

Co-Chairs:

Joyce Stern, Dean for Student Success and Academic Advising
Angela Voos, Chief of Staff, Vice President for Strategic Planning and Title IX Coordinator

Membership:

Sarah Anderson, Director of Interactive Media and Web Publisher
Jennifer Brooks '15
Gwendolyn Ihrie '15
Jennifer Krohn, Senior Research Associate
David Lopatto, Director for the Center for Teaching and Learning; Professor of Psychology
Linda Ludwig, Information Technology Training and Communications Specialist
Tammy Nyden, Associate Professor of Philosophy
Renee Rockwell, Associate Dir of Project Management for ITS
Dixon Romeo '16
Angie Story, Coordinator of Academic Support and Assistive Technology
Autumn Wilke, Coordinator of Disability Resources
Eliza Willis, Professor of Political Science

with assistance from communication facilitators
Rebecca Loew (fall) and Lucy Chang (spring)

and additional subcommittee participants
Chris Bair, Environmental and Safety Manager
Jillian Beukema, Associate Director of Annual Giving
Dana Boone, Coordinator of Internal Communications
Sondi Burnell, Academic Technology Support Specialist
Ben Cooprider, Coordinator of Athletic Facilities
Donna Dralus, Online Media and Web Associate
Corey Hammond, Associate Director of Facilities Management–Construction & Maintenance
Teresa McCall, Guest Housing and Special Programming Coordinator
Jeanette Moser, Associate Director of Dining Services
Russ Motta, Assistant Director of Security
Rick Whitney, Director of Facilities Management

Appendix B: 2014–15 Accomplishments

The Task Force's work included nine months of engaged discussion and strategic thinking about disability and accessibility on campus. During this same timeframe, members of the Task Force, in concert with others on campus, accomplished many notable things.

Campus Awareness-Building and Education

1. Town Hall Meetings — Sept. 30, noon and 7:30 pm — provided an opportunity for engagement with the campus community, to raise awareness of key personnel, and to introduce a common language around disability and accessibility.
2. *Scarlet and Black* Articles about the Task Force, the Town Hall and the Open House — Oct. 3 (www.thesandb.com/news/town-hall-covers-disability-accessibility.html) and Oct. 31 (www.thesandb.com/news/kington-appoints-college-disability-and-accessibility-task-force.html)
3. Open House for Disability Resources and Assistive Technology — Oct. 29 and 30.
4. Faculty Friday on Universal Design for Learning — Nov. 21, with guest speaker Karen Boutelle, associate director, Landmark College Institute for Research and Training (www.landmark.edu/institute/lcirt-home)
5. Student Disability Resources Advisory Group – beginning in November, this group of students met with Autumn Wilke bi-weekly to provide feedback on the procedures and services of Disability Resources. The group also helped to plan Disability Cultures Week.
6. Disability Cultures Week, Feb. 23 – Mar. 4, was co-sponsored by Disability Resources, the Student Disability Advisory Group, Active Minds, Assistive Technology, and Accessibility Services. This week included the three programs: Ms. Sandie Yi, disability art activist; Out@Work co-sponsored by Careers, Life, and Service, on accommodations and disability in the workplace; and a political activism workshop. (http://www.thesandb.com/opinion/letter-to-the-editor-disability-cultures-week-focuses-on-accessibility.html)
7. Mental health awareness presentation for faculty by Dr. Laura Van Cleve, spring 2015.
8. Hearing and induction loop education for staff/faculty by Dr. Juliette Sterkins, Apr. 22.
9. Salome Heyward, JD, consulted on campus on May 4; her visit was sponsored by risk management. Ms. Heyward spoke with faculty, staff, and students and provided valuable information about the rights/responsibilities of various constituents and the challenges facing campuses related to appropriately accommodating individuals with disabilities.
10. Backpacks in JRC lobby and bikes blocking pathways – beginning in February, educational efforts about blocking of pathways began. Masking tape was placed on the floor in the JRC lobby outside of the dining hall to indicate appropriate places for backpacks and coats; this effort resulted in increased compliance by students. Campus disability advocates place hangtags on bikes they find that are impeding accessible pathways, such as blocking sidewalks or use of handrails.
11. Meetings with academic departments – Angie Story, coordinator of academic support and assistive technology, and Autumn Wilke, coordinator of disability resources, offered

departmental information sessions and trainings to each of the academic departments. In April and May, Angie and Autumn met with seven academic departments to discuss accommodations, assistive technology, and universal design.

Physical Accessibility Upgrades

1. Observatory pathway and sound system installed in late summer/early fall.
2. Pool stairs installed fall 2014.
3. Hearing loop system installed in JRC 101 and in JRC 209 (fall and winter breaks) and JRC Marketplace Checker Station and Burling Library Circulation Desk and Lounge (June 2015)
4. ARH stairway handrails installed during winter break.
5. Submitted recommendations for use of Building, Maintenance & Equipment fund for accessibility enhancements to be completed during 2015-16 year.
6. Net Nutrition, a program that provides nutritional content of products used in dining services, was authorized for purchase.
7. Fluorescent lighting upgraded to LED lighting in Bear classrooms and in Langan Hall.
8. Installed door operators on three offices in the JRC: Coordinator of Disability Resources, Assistive Technology, and Accessibility Services.

Staffing Enhancements and Policy/Procedure Updates

1. Filled a new full-time position, coordinator of disability resources, with Autumn Wilke. Located her office in the JRC next to a new office for the assistive technologist, Angie Story, for greater student access.
2. Documentation Guidelines rewritten
3. Accommodation Request Form created
4. Disability accommodation appeal procedure created (see http://www.grinnell.edu/policies)
5. Harassment and discrimination grievance process revised and consolidated (see http://www.grinnell.edu/policies)
6. Assistance and service animal policy written and implemented (see http://www.grinnell.edu/policies)
7. Flexibility with attendance process created and implemented
8. Final exam testing process created and pilot tested

Appendix C: Accessibility Committee Barrier Removal Prioritization 2014-15 and Future BM&E Funding

During fall 2014, the standing Accessibility Committee, chaired by Jennifer Krohn, developed a systematic process for barrier removal on campus. This process identifies physical accessibility improvements needed on campus and a framework to rank each item. The Committee identified approximately 40 items, small and large, ranging from building entrance renovation to food ingredient software. The items were then ranked as follows:

1. Was the item included in the recommendation of Mr. Tom Thompson's May 2014 external evaluation of campus accessibility?
2. Is this high-impact, easy fix?
3. What is the risk of not doing this?
4. What is the relationship to the OPN Campus Plan?
   a. Phase 1: ARH/Carnegie, Landscaping, Admissions
   b. Phase 2: Providing Academic Commons, Supporting Career and Life Services, and bringing Alumni Services back to campus
   c. Phase 3: Living in a Residential Community and Providing Health and Wellness
   d. Not included
5. If part of the Campus Plan (#4 above), should the project be moved ahead of its phase?
6. Is renovation of the facility not currently under discussion?
7. Is this a compliance issue?
8. Has applicable code/law changed to be more inclusive than when originally applied?
9. Regardless of compliance, is this the "right thing to do" for campus?
10. Rough estimate of cost

Using this framework, a request was made to the Building, Maintenance, and Equipment Committee in December 2014 for funding.

In April BM&E replied to the Accessibility Committee and to relevant department heads that the following items would be funded in FY 2016, were referred to Campus Landscape Master Plan or were deferred to FY 2017 for funding.

1. Wayfinding Signage –referred to Campus Landscaping Master Plan
   a. throughout campus and
   b. in buildings including Noyce and Burling
   c. that includes Braille and raised letters and
   d. indicates locations of accessible outside door

2. High-Impact, Low-Cost Projects
   a. Install door operator on the north corner entrance to the John Chrystal Center
   b. Install door operator on South Campus loggia southwest door
   c. Remove step on the South Campus loggia southwest entrance

3. Areas of High Risk
    a. Tactile warning strips replace worn out strips and add new ones as needed on campus (Phase 1 of 3)
    b. Implement technology solution in Dining Services to allow universal access to ingredient lists and nutrition information of each food item

4. Projects that Directly Impact Student Life
    a. Fix ramp for turning radius at the Center for Careers, Life and Service
    b. Renovate Campus Safety and Security entrance: raise porch floor to door threshold, add new exterior ramp, new exterior entrance door with operator, and add accessible counter space and 5' turning radius in foyer.
    c. Renovate loggia entrance to Main Hall, and add additional door operator— Deferred to FY 2017 because actual cost estimate came in $80,000 over projected estimate.

Given the funding of the above projects for FY 2016, the Accessibility Committee recommends the following as top priorities for FY 2017. This list will be reviewed again in the fall semester, per established process.

1. Campus way-finding signage within buildings and throughout campus. (Referred to Campus Landscaping Master Plan)
2. Installation and replacement of tactile warning strips (Phase 2 of 3, funded by BM&E)
3. Renovate the loggia entrance to Main Hall including an ADA-complaint ramp and doorway with door operator (BM&E deferred to FY 2017 funding)
4. Usability redesign the 8th Avenue entrance to Noyce (Included in Campus Landscaping Plan)
5. Usability evaluation of accessible parking on campus that includes van parking
6. Installation of induction loops throughout programmatic space on campus
7. Addition of door operators for rest room doors
8. Accessibility of CRSSJ programs, services, and space by renovation or current space or relocation
9. Accessibility of the Stonewall Resource Center by renovation or relocation
10. Availability of parking for bicycles; move bikes that block accessible paths (near doors and locked to handrails)

The following item remains on the list of priorities for FY 2018.

1. Installation and replacement of tactile warning strips (Phase 3 of 3 funded by BM&E)