

Virginia Tech Disabilities Support Task Force
Recommendation Report

VIRGINIA TECH DISABILITY SUPPORT TASK FORCE RECOMMENDATION REPORT

Task Force Chairs

Chris Wise, Co-Chair (Assistant Vice President for Student Affairs)

Robin Panneton, Co-Chair (Associate Dean for Undergraduate Programs, COS)

Task Force Members

Michael Brown, Assistant Director Services for Students with Disabilities

Tom Brown, Assistant to the Vice President of Student Affairs

Stephen Capaldo, Associate University Legal Counsel (advisor)

Jeff Earley, Associate Vice Provost for Finance

Nicolin Girmes-Grieco, Advanced Instructor HNFE

Ashley Shew, Faculty member STS (advisor to Disability Alliance)

Jennifer Hodgson, Associate Dean Vet Med

Frances Keene, Interim Director of Housing and Residential Life

Rhonda Mitcham, Associate Director/Finance, Schiffert Health Ctr

Brett Netto, BOV graduate student representative

Adrian Ridings, Vice President United Feminist Movement; member of SGA

Marcy Schnitzer, Liaison with the Disability Caucus/Alliance and OID

Deborah Smith, Assistant Director Services for Students with Disabilities

Kimberly Smith, Assistant Vice Provost for Academic Advising Initiatives

Harald Sontheimer, Executive Director, School of Neuroscience

Pamela Vickers, Director, ADA (Americans with Disabilities Act) and 504 Coordinator

Introduction¹

Virginia Tech aspires to provide full access and inclusion for students with disabilities to all campus programs, both curricular and co-curricular. The Services for Students with Disabilities (SSD) Office works with campus partners to provide appropriate accommodations and services to students to support their education under the Americans with Disabilities Amendments Act of 2008 (ADA, 1990 & Amendments, 2008) and Section 504 of the Rehabilitation Act of 1973. Consistent with our commitment to inclusion and diversity and our Principles of Community, we continuously seek to provide the necessary infrastructure to enable students with disabilities to succeed at Virginia Tech. The presence of individuals with disabilities enriches our campus.

From 2012 to 2016, the number of students served by the Virginia Tech SSD Office increased approximately 40%. During this same period, referrals for assistance also grew 45%. These factors, together with auxiliary students as well as those with status changes, resulted in a 39% increase in the number of students registered for accommodation or disability services during the 2016-2017 academic year. Clearly, we are facing an increasing call to provide reasonable accommodations for students with disabilities. In order to address these needs, the Disabilities Support Task Force was formed in fall 2018 to study the experiences of students who receive services from SSD, to benchmark SSD practices and processes at peer institutions, and to make

¹ This report is not legal advice nor is it to be construed as a legal analysis of Virginia Tech's Office of Services for Students with Disabilities.

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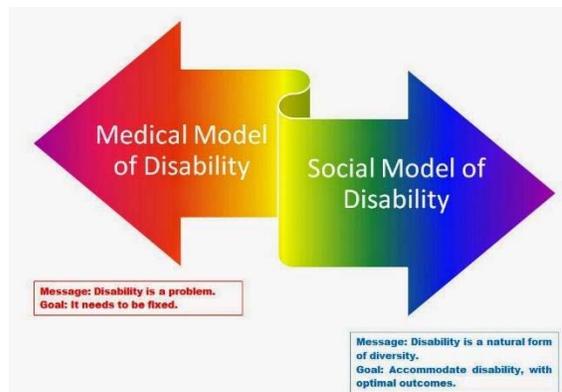
recommendations regarding actions that Virginia Tech should take to ensure we are serving students with disabilities both now and in the future.

The Disabilities Support Task Force report is structured to address each of six questions posed by the Provost. For each, we discuss and integrate relevant research findings, our surveys of student, staff and faculty groups on our campus and on peer campuses, and our own deliberations. Here are the questions that this report answers:

1. How does Virginia Tech compare with its peer universities in regard to the number of students provided accommodations and related commitment of resources (e.g., staffing, funding, funding model, space etc.)?
2. How are federal mandates regarding students with disabilities communicated with and implemented by SSD?
3. What resources are needed for Virginia Tech to meet its legal obligations and aspirational goals in support of students with accommodations (e.g., staffing levels and qualifications of staff, funding models and levels of funding, space requirements related to programs and/or testing etc.)?
4. What additional policies and procedures, if any, need to be developed to address the use of service animals as approved accommodations? (pending new legislation)
5. Are there improvements that may be made to better coordinate the actions of SSD and the colleges to provide seamless accommodations to students in a timely manner?
6. How may SSD and associated offices educate and support faculty and department heads in implementing services for students?

Executive Summary

The aspirations of Virginia Tech are to go above and beyond the minimal standards for meeting the needs of students with disabilities. Moving from a medical model approach to a social model approach is a national best practice and one that fully embodies our commitment to our Principles of Community as well as our university motto, *Ut Prosim*. The social model of disability (see schematic to the right) proposes that what makes someone disabled is not their medical condition but the attitudes and structures of the community within which they live. This model recognizes that many of the barriers faced by people with disabilities are ones that are arbitrary and constructed by our design, expectations and cultural biases. The mindset afforded by the social model of disability challenges many of our practices in institutions of higher learning. For example, rather than simply asking a given faculty member to make an exception to a standard practice in a classroom to accommodate a student with a disability, this model encourages all educators to design their classes in ways that break down barriers for a variety of students. In doing so, the impact of universal design for learning is often one where all students benefit, not just those who are disabled. This shift will require education and longer term work with academic partners and administration to provide updates to institutional barriers through universal/inclusive design in teaching delivery methods and in administrative processes, although it will not be a replacement for an accommodations process. It is also important to note that the social model approach is not a replacement for the legally required interactive accommodation process under Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.



On campuses throughout the nation, offices dedicated to serving students with disabilities continually struggle to secure sufficient medical information, educate faculty and staff about the importance of providing optimal educational opportunities for all their students, and empower students to utilize accommodations in ways that promote their academic achievement. Virginia Tech is on par in its efforts to provide these services in comparison to many peer institutions, yet the challenges continue to mount as enrollment grows, and awareness of the need to ensure accommodations grows along with it. Roughly half of our students who annually seek accommodations from SSD had their disability diagnosed before coming to Virginia Tech. Thus, some awareness of disabilities, their definition, and the accommodations they engender is present in incoming students. Nonetheless, SSD continues to see a significant number of students with disabilities not coming forward with their diagnosed disability because of negative stigma, or not coming forward to obtain a diagnosis for a disability because of negative stigma. Importantly, the other half of the students who ultimately register for accommodations have their disabilities assessed, diagnosed, and documented with SSD during their time on campus. Students who need assessment for a disability often face financial barriers, time demands, and long wait times.

Through consideration of the literature, analysis of survey data, an assay of Virginia Tech's current practices, and discussions with directors of Services for Students with Disabilities Offices at comparison institutions, the SSD Task Force developed several key recommendations

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that are summarized in the sections dedicated to answering each of the six questions mentioned above. Collectively, we see the need to encourage and support both students who come with accommodation needs and those who discover accommodation needs as they forge their academic careers at Virginia Tech. The Task Force also gathered information that suggests a need for ongoing, sustainable education and outreach to our course instructors and staff regarding best practices in helping students with disabilities. The SSD Office requires enhanced support to meet and *exceed* its obligations to promote accommodations in the form of increased staff, modernized data base management, and comprehensive funding.

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Question 1: How does Virginia Tech compare with its peer universities in regard to the number of students provided accommodations and related commitment of resources (e.g., staffing, funding, funding model, space etc.)?

The Services for Students with Disabilities (SSD) Office at Virginia Tech provides numerous accommodations, services, and resources for students with disabilities (including those with temporary illnesses, chronic conditions, injuries, etc.). In order to compare Virginia Tech to peer institutions, we gathered information from websites and conducted survey analyses. First, we identified a list of 24 comparison institutions, both from our SCHEV (State Council of Higher Education for Virginia) peer comparisons and from other 4-year, land-grant institutions of comparable size. In addition, we sent surveys to 24 directors and received responses from 10. The institutions are:

University of Michigan	University of Pittsburgh	State University of New York,
University of Florida	Rutgers University	Buffalo
Michigan State University	University of Southern California	University of Wisconsin
University of Minnesota	University of Texas	University of Colorado Boulder
North Carolina State University	Iowa State University	University of Missouri
Texas A&M University	University of Maryland	University of Washington
Virginia Commonwealth University	The Ohio State University	University of California, Davis
University of California, Berkeley	Pennsylvania State University	
University of Illinois	Purdue University	

Second, we summarized a comparison of logistic issues with respect to services for disabilities across the institutions and as compared to Virginia Tech. The following results were obtained:

Title of the office (contain the words "Disability", "Accessibility", or both?) 74% used the word "Disability" for this office. *This is consistent with the naming of our office at Virginia Tech*

Position of the Office of Student Services for Disabilities in their organizational flow-chart. 44% are positioned under Student Affairs. *This is consistent with the position of our office at Virginia Tech*

Staff size of the Office of Student Services for Disabilities? 44% have between 11 - 20 staff members. *Virginia Tech's SSD Office has 13 staff members, putting us in the 44% response option.*

Testing Center within the Office of Student Services for Disabilities. 78% have a testing center. *This is consistent with the availability of a testing center in our office at Virginia Tech.*

Capacity of the Testing Center within the Office of Student Services for Disabilities. (This was difficult to ascertain from the majority of websites); *26% were able to seat between 20-44 students and Virginia Tech is within this range.*

Average proportion of enrolled undergraduate students typically registering for accommodations. 5% of the student body was the norm (range was 4 - 7%); *This is consistent with the SSD registration rate at Virginia Tech (5.5% in 2017-2018)*

General student:staff ratio. The current student:staff ratio for SSD is 155:1 at Virginia Tech. This is at the median level of our comparison institutions (see **Table I**). However, the composition and responsibilities of the staff vary across institutions, making exact comparisons difficult. For example, many institutions supplement full-time staff with varying levels of part-time employees,

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student workers, and contracted services. At least one institution (Michigan State University) indicated that their office serves the disability needs of university employees (not reflected in *Table 1*) in addition to students - this was unlike most other institutions. Additionally, at Virginia Tech, many of the full-time staff serve dual roles. The outreach coordinator, for example, is also a disability counselor. It cannot be determined from the survey the extent to which staff at the responding institutions have dual responsibilities, and if so, what those responsibilities are.

Table 1: Fall 2018 Qualtrics Survey Findings

Respondents	# of Students Requiring Services	Disability Office Staff Size	Student-to-Staff Ratio
University of California, Davis	1,650	18	92:1
Michigan State University	2,176	20	109:1
Purdue University	2,020	17	119:1
University of Colorado Boulder	1,900	14	136:1
University of Missouri	1,400	10	140:1
Virginia Tech	1,700	11	155:1
Iowa State University	1,700	8	213:1
University of Minnesota - Twin Cities	3,500	16	219:1
Virginia Commonwealth University	1,585	7	226:1
University of Washington	3,000	10	300:1
University of Michigan, Ann Arbor	2,992	9	332:1

Nevertheless, all institutions surveyed reported trends toward increasing need for disability services on their campuses. The number of college students with disabilities is increasing nationally² and, similar to many other universities, SSD at Virginia Tech will have to adapt to this trending demographic. From Fiscal Year 2012 to 2017, the need for disability counseling and services at Virginia Tech increased by 63%, from 1,071 to 1,700 students served respectively. The largest increases occurred among students with ADHD, learning, and psychological disorders (see *Appendix 1*). During this time period, the SSD Office at Virginia Tech increased its staff by one position (a counselor/outreach coordinator), converted a part-time receptionist position to full-time, and transferred its business management function to another university department (without the associated funding) to create a Coordinator for Accessible Instruction. However, given that the percent of students attending college with disabilities is increasing, the number of students needing assistance is likely to be higher than this amount by the time the university reaches its enrollment goals. The staffing level and responsibilities in the SSD Office will need to be re-evaluated to effectively manage this projected growth.

To date, we have adapted current positions in piecemeal fashion to meet the SSD needs of our campus. Moving forward, it is clear that Virginia Tech must respond to the rising demand for SSD accommodations via dedicated counselors. We make specific recommendations for staffing needs in Q3 below.

Space: Space was an issue for almost all of the comparison institutions contacted. Some universities are even renting space adjacent to campus, mostly to expand the need for exam accommodations. At Virginia Tech, the 2019 expansion to the Werth Testing Center was made possible through private funding that increased its capacity from 22 to 44 seats. At 44 seats, the center is among the largest compared to the peer institutions in our survey. Before expansion, the testing center was sufficient to handle testing needs during the academic year, but not during final exam periods. *Appendix 2* summarizes testing center statistics. During final exam times, staffing the testing center was an issue in addition to space, as SSD staff currently proctor all exams

² Lyman, M., Beecher, M. E., Griner, D., Brooks, M., Call, J., & Jackson, A. (2016). What Keeps Students with Disabilities from Using Accommodations in Postsecondary Education? A Qualitative Review. *Journal of Postsecondary Education and Disability*, 29(2), 123-140.

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occurring within the testing center.³ During Spring 2019, 3,187 requests for testing in SSD were made, 257 of which were initially rejected. Of those, 171 were rescheduled for a different day/time. The remaining 86 requests could not be accommodated at SSD because SSD could not find space or another day/time that worked. Departmental faculty members were left to find a space and time to administer the test on their own. Of the 3,187 requests in Spring 2019, 578 were for final exams.

At Virginia Tech, current SSD Office allocations are adequate for existing staff and provide sufficient privacy for individual counseling sessions. However, an increase in staff to support projected growth in the need for services may require more space than is currently available and a reconfiguration of the existing space. Like our peers, a testing center is available for professors who do not have space to make specialized testing accommodations within their home departments. It would also be greatly beneficial if we created physically adjacent space with the Psychological Services Center so that the assessment and diagnoses of disabilities could be a more seamless process for the student seeking accommodations. We make specific recommendations for increased space need in Q3 below.

Funding Model: The funding model for SSD at Virginia Tech is such that the budget is currently supported by state general funds and tuition paid by students. Our SSD Director survey showed our funding model (E&G funded through the Provost Office) is the standard. However, the amount of funding across institutions differs significantly.

The current SSD budget at Virginia Tech covers office administration, disability counseling, minimal programming, and routine direct accommodations associated with interpreting/captioning and testing services. This model is the norm for the majority of our comparison institutions. Moreover, Virginia Tech's SSD Office also has access to occasional private funds (i.e., donations) that have been used to assist students with the cost of psychoeducational testing and other uncommon costs. For example, a recent donation funded the expansion of the Werth Testing Center. Some (but not the majority) of our comparison institutions also spoke to the availability of donor funds to supplement support coming from general funds.

We also asked how the various offices funded direct accommodations (both common and rare) for students. At Virginia Tech, some direct accommodations are partially covered by general funds, but others (e.g., note-taking) are 100% covered by student volunteers. SSD also works to share the cost of direct accommodations with departments. More rare, less predictable accommodations (e.g., pieces of equipment; Braille textbooks) are funded either by the SSD Office, Provost, Student Affairs, and/or the academic units. If the cost of accommodations exceeds SSD's and academic units' ability to pay, SSD has traditionally sought additional funding from the Provost's Office and/or a reserve fund that is also available for more expensive and/or more rare direct accommodation services. This appeared to be highly similar to all of our comparison institutions, although none of them mentioned volunteer note-takers or expecting academic units to pay for more rare accommodations.

Historically, Virginia Tech's SSD Office has struggled to secure routine operating costs due to the need to fund an increase in the number of, and the costs for, direct accommodations out of their operating budget. This financial strain has adversely impacted SSD's ability to provide adequate

³ Importantly, students at the College of Veterinary Medicine are not among these reported numbers. In fall 2018, The CVM proctored 132 students in 47 different exams. In spring 2019, they proctored 109 students in 50 different exams.

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training to staff, to offer better campus outreach and education, and to plan strategically. The cost and type of accommodations can vary from year to year, semester to semester, and at times can be very unpredictable and expensive. For example, there are currently deaf or hard-of-hearing students enrolled at extended campuses. Accommodations for these students require interpreting and C-Print captioning services. These services are provided by local agencies/independent contractors and tend to be expensive, with the current estimated cost to provide these accommodations for the 2018-2019 academic year at \$80,000. Another example is the need for specialized equipment in labs. In spring 2018, a visually impaired student required a specialized camera and microscope, which cost \$4,787. It is difficult to predict these needs. Given the potentially extensive and often unpredictable nature of expenses related to the SSD Office, we make specific recommendation for changes to our funding model in Q3 below.

Question 2: How are federal mandates regarding students with disabilities communicated with and implemented by SSD?

In addressing this question, we begin with a review of federal mandates regarding access to accommodations for students with disabilities at the nation's institutions of higher education, and then discuss how these mandates are communicated and implemented at Virginia Tech.

As required by law, Virginia Tech complies with the (1) Americans with Disabilities Act (ADA; as amended), (2) Section 504 of the Rehabilitation Act of 1973, (3) Section 508 of the Rehabilitation Act of 1973, (4) Fair Housing Act, and (5) other relevant state and/or local laws pertaining to individuals with disabilities.

Americans with Disabilities Act (ADA), as amended

The ADA, as amended, is a federal civil rights statute that prohibits discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, private businesses, transportation, and telecommunications. In public government and state institutions that have 50 employees, the ADA requires that the institution have an ADA Coordinator to coordinate the institution's compliance.

To be protected by the ADA, one must have a disability. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is regarded as having a disability. Major life activities include things like breathing, walking, and concentrating - fairly broad categories. The ADA does not specifically name all of the impairments that are covered.

Reasonable accommodations for students with disabilities who self-identify and are otherwise qualified are covered the ADA and Section 504 of the Rehabilitation Act (discussed in more detail below). Both require an interactive process in order to make reasonable accommodations. Public universities are required to make reasonable adjustments or modifications to practices, policies and procedures, and to provide auxiliary aids and services for students with disabilities, unless to do so would "fundamentally alter" the nature of the programs or result in an "undue burden." Providing accommodations in the classroom or laboratory should not compromise the essential elements of a course or curriculum, or weaken the academic standards or integrity of a course or program. Accommodations simply provide an alternative way to accomplish the course requirements by eliminating or reducing disability-related barriers.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits disability discrimination in programs, activities, events, services, and at institutions that receive federal funding. This includes discrimination against qualified applicants and employees with disabilities, as well as discrimination in the services and activities provided by agencies who receive federal funding. The nondiscrimination provisions of Section 504 are similar to those found in Title I of the ADA, covering employment discrimination, and Title II of the ADA, covering the programs, activities, and services offered by state and local governments. The law provides, "'No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the

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benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Section 508 of the Rehabilitation Act of 1973, as amended

Section 508 establishes requirements for electronic and information technology developed, maintained, procured, and/or used by the federal government. Section 508 requires federal electronic and information technology to be accessible to people with disabilities, including employees and members of the public. This includes websites, applications, and electronic documents such as PDFs. Section 508 was updated in 2017. The new update refers covered entities to the Web Content Accessibility Guidelines (WCAG) 2.0 AA which focuses on usability by everyone. The four main principles state that electronic information should be perceivable, operable, understandable, and robust.

An accessible information technology system is one that can be operated in a variety of ways and does not rely on a single sense or ability of the user. For example, a system that provides output only in visual format may not be accessible to people with visual impairments and a system that provides output only in audio format may not be accessible to people who are deaf or hard of hearing. Some individuals with disabilities may need accessibility-related software or peripheral devices in order to use systems that comply with Section 508.

Fair Housing Act

The Fair Housing Act is a federal statute that applies to universities and colleges that receive federal funding and offer housing. The act protects individuals from discrimination in housing based on race, color, religion, national origin, sex, familial status, disability, marital status, and age. Public universities that offer housing and receive federal funding must comply with Section 504 of the Rehabilitation Act of 1973 and the ADA as it pertains to common use areas.

How are mandates communicated and implemented across the campus?

In addition to providing accommodations, SSD also provides education and outreach to the campus community on issues related to students with disabilities. Ensuring accessibility in the classroom is a team effort between student, faculty, and SSD. Information and training are vital to the overall effort because each member must be aware of their rights and responsibilities during the accommodation process.

SSD engages in comprehensive outreach efforts each year to inform students of their right to accommodation if they are a person with a disability, starting with orientation for incoming students⁴. Students also complete an SSD orientation after receiving accommodations; this orientation apprises students of their rights and responsibilities. Student rights are also included on the student's accommodation letter; an instructor's rights and responsibilities are also listed on the accommodation letter, and the student and instructor review this information in discussing implementation. Additionally, SSD partners with academic departments and campus units to

⁴ University Policy 4075 outlines SSD's role in helping the University comply with federal mandates. University Policy 1025 encompasses anti-discrimination provisions of federal mandates. These policies are made available to students at policies.vt.edu, in SSD and on SSD's public website. Students receive training on Policy 1025 through a mandatory diversity course completed by all entering students.

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provide targeted outreach and guidance to instructors and faculty on accommodations in specific areas (housing, sports and athletics, study abroad, foreign languages, professional programs, etc.)

Like some of our peers, Virginia Tech's SSD Office host events throughout the year in high traffic areas to promote the full extent of the support offered. From our director survey (see Question 1), most of our peers have outreach personnel who are responsible for communications to students, faculty and staff. Nonetheless, there are still areas of the accommodation for disability process that seem to create confusion. For example, students are not always aware of the resources available to them to both secure an accommodation and prepare for discussions about this accommodation with their course instructors. Many course instructors are unsure of their rights and what they can and cannot ask or say to a student. Better and recurring student and faculty training programs can provide faculty with the knowledge they need to help the student be successful in the classroom. This education is largely the responsibility of an outreach coordinator in the SSD Office. Virginia Tech has a position such as this, but that position is also doing accommodations work due to demand. It would be highly beneficial for Virginia Tech to dedicate an outreach position to the education of disability issues across the campus. Additionally, we could greatly benefit from funding professionals at the Psychological Services Center for assessment of disability in a more timely fashion (these recommendations are presented in Q3 below).

Question 3: What resources are needed for Virginia Tech to meet its legal obligations and aspirational goals in support of students with accommodations (e.g., staffing levels and qualifications of staff, funding models and levels of funding, space requirements related to programs and/or testing etc.)?

As stated in our executive summary, Virginia Tech aspires to go above and beyond the minimal levels of support for students requiring accommodations on our campus. As the stigma of disability decreases and our enrollment increases, we are faced with the ongoing challenge of serving our students effectively in creative, inclusive, and empowering ways that bolster success. To further understand what resources are needed for Virginia Tech to meet its aspirational goal, students with disabilities, we developed a survey that was sent out to 5000 randomly-selected students from the general population in fall 2018 (graduate and undergraduate). The response rate was 537 students (11%), of which 191 students reported having a disability; 33% of these students had sought services. Of the remaining 67% students with disabilities who had not sought services, 24% indicated that they were not interested in receiving accommodations, 19% said they had not yet secured an assessment, 19% said they did not have time, and 17% said they did not have the correct documentation. Of those students having received SSD services, the majority expressed some level of ambivalence in terms of the process they went through to be approved, the process for setting up accommodation(s), and the process of working with their faculty to secure accommodations. Most of these students required additional test time, alternative testing spaces, and/or note-takers. On a more positive note, 78% of these students were satisfied with their follow up interactions with SSD. Clearly, Virginia Tech aspires to improve students' abilities to secure disability accommodations in a timely, cost-effective manner, and to be supported in actually implementing their accommodations in ways that enhance their academic success.

Staffing Needs

SSD reports that it is presently over-functioning and under-resourced and will need additional support to manage the current and projected increase due to (1) cultural shifts in the decreasing stigmatization surrounding disabilities, and/or (2) more accessibility to higher education for members of the general population with disabilities. As Virginia Tech increases its undergraduate enrollment to 30,000 students over the next few years, the number of students requiring disability counseling and services is also projected to increase. **Table 2** shows the number of students served by SSD as a percent of all students at Virginia Tech from Fiscal Year 2013 to 2017. In FY2017, more than 5.5% of all

university students received services from SSD. Assuming this share of the student body remains level, increasing the undergraduate enrollment by an additional 5,000

Table 2: Percent of Virginia Tech Students Served by SSD

	Fall 2012	Fall 2013	Fall 2014	Fall 2015	Fall 2016
Total Undergraduates	23,796	23,976	24,179	25,318	25,741
Graduates	4,620	4,647	4,529	4,793	4,860
Vet Med	420	448	465	487	489
Total Fall On-Campus Enrollment	28,836	29,071	29,173	30,598	31,090
	FY12-13	FY13-14	FY14-15	FY15-16	FY16-17
# of Students Served by SSD	1,236	1,353	1,701	1,605	1,738
% of VT Students Served by SSD	4.29%	4.65%	5.83%	5.25%	5.59%

students would increase the number of SSD students by 275 annually.

The following recommendations for staffing adjustments will be necessary to achieve our aspirational goals:

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1. Disabilities Services Counselors: It is recommended that SSD adds four (4) disability counselors⁵ over the next four years to address the projected increase in disability cases that will result from growing undergraduate enrollments at Virginia Tech. This addition is projected to result in a student-to-SSD staff ratio of 140:1 by Fiscal Year 2022-23, slightly lower than the current 155:1 ratio. Without this addition, a projected increase in need will reduce SSD's ability to effectively manage disability services. The additional counseling support also will allow SSD to relieve the outreach coordinator of their counseling responsibilities so that position can work to improve campus education and outreach.
2. Outreach Coordinator: The addition of one full-time outreach coordinator would allow SSD to better educate and support students and faculty both on the Blacksburg and extended campuses (e.g., Roanoke). Currently, the SSD Outreach Coordinator serves a dual role as a disability counselor (40% outreach; 60% counseling). Currently, SSD is operating on a reactive approach to faculty education out of necessity (i.e., educating faculty when a need arises rather than developing an active, ongoing campaign of education and support). Having a full time staff member dedicated to outreach and faculty education would allow SSD to go beyond the law by being proactive and better serving the needs of students.
3. Psychoeducational Testing Staff: Currently, the primary support source for psychoeducational testing is provided by the Psychological Services Center, affiliated with the Department of Psychology at Virginia Tech. Virginia Tech should support the addition of staff at the Psychological Services Center whose primary role would be to provide psychoeducational testing. Psychoeducational testing determines if a student has a learning disability or other issue that negatively impacts their ability to succeed in classrooms built around particular norms. These testing results assist SSD in determining if accommodations are needed and what type of accommodations would be best suited for each student based on their testing results. The costs of psychoeducational testing and the current appointment wait times for this testing in the community or at the Psychological Services Center, which currently has a six month waiting list, can be barriers for many students. As an auxiliary enterprise, the Psychological Services Center could assist in addressing some of this need within our student population potentially at a lower cost. For many of our students, academic achievement depends on having disabilities diagnosed as early as possible and then having access to services to support disabilities. Note that SSD cannot provide both psychoeducational testing and disability services as it would be considered a conflict of interest. This may be an opportunity to create shared space between PSC and SSD.
4. Convert 1,500-hour Wage Administrative Assistant to Full-time: Considering the most recent increase in size of the testing center, the current 1500 hour wage administrative assistant should be converted to a full-time position. This position currently provides back-up to the front office administrative assistant as well assistance to the testing coordinator. Converting this position to full-time will allow for greater coverage in the testing center and help to recruit and retain a more qualified individual in this position.

Logistic/Space Needs

As discussed above, current SSD Office allocations at Virginia Tech are adequate for existing staff and provide sufficient privacy for individual counseling sessions. However, the increase in staff to support projected growth mentioned above creates the need for more space and/or a

⁵ This recommended number includes the most recently requested critical needs counselor to accommodate the unanticipated accepts in fall 2019.

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reconfiguration of existing space. It is likely that even our newly expanded testing center will be tapped out as enrollment increases.

Many of our peers allow for students to apply for accommodations on-line and use accessibility software to conduct their business. Others, like Virginia Tech, have adapted software that is not designed for disability offices. We lag other institutions in having an online intake system that could greatly expedite the receipt and transmission of information for students seeking accommodations. Given the university's projected increase in the number of students requesting accommodations, it is more important than ever that SSD has the capacity to document all of its activities for the purpose of assessment, forecasting and strategic planning. Currently, SSD is using Mediat software (an electronic medical records system) to manage disability services. This system, designed for health care management, has the ability to house counselor notes, schedule student appointments and store student documentation. However, it lacks functionality to support the coordination and management of disability services across the university. Other institutions have software applications that are designed specifically for disability services management and offer improved functionality over the system currently in use at Virginia Tech.

The following recommendations for space and technological/management support will be necessary to achieve our aspirational goals:

1. It would be greatly beneficial if we created physically adjacent space with the Psychological Services Center so that the assessment and diagnoses of disabilities could be a more seamless process for the student seeking accommodations.
2. A new database would give students more control over their information (e.g., uploading required documentation) which would increase SSD administrative efficiencies, increase compliance ability, and give students more autonomy in managing their accommodations. *Appendix 3* summarizes information and associated costs of three disability services software programs currently in use at peer institutions. These applications allow for a more integrated solution to disability management, enable better electronic processing of information for students, faculty and employees, and enhance reporting.
3. Implementing a new model for caseload management in which each disability counselor would have a set number of students they work with would improve continuity of service and increase efficiency since each student and faculty member would know whom to contact. This would also improve students' perceptions about waiting times to speak with a disability counselor since each student would know whom to contact. In addition, a staff caseload model would improve efficiency with the SSD documentation review process. Currently, SSD works on a first-come first-serve basis, which creates some inefficiencies with reviewing documentation and inefficiencies in meeting students where they are.

Funding Model Needs

A new funding model would help to steer Virginia Tech's SSD Office into a more secure, financially solvent future. Specifically, we feel that the SSD Office should have a separate operating budget from that required for the delivery of direct as well as unique accommodations. The operating budget for the SSD Office should cover staffing of both counselors and outreach personnel, as well as efforts to sustainably educate faculty, staff, advisors and students on disability issues across our campus.

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The following recommendations for changes to the funding model for disabilities accommodations will be necessary to achieve our aspirational goals:

1. It is recommended that Virginia Tech centralizes its budget for direct accommodations as well as establishing an operating expense budget to SSD for typical office operations. Any remaining dollars at year-end would roll over into an *accommodations reserve budget* to be used in any given year that the accommodations budget is insufficient due to demand. For example, one of our peer institutions provides \$45K for operations, \$261K for accommodations budget and their accommodation reserve is currently at \$150K. The hope is for this reserve to provide sufficient funding in any year where there is unusual demand or specialized needs. This would greatly reduce the financial burden of meeting unique accommodation demands on our academic departments.
2. An increase in funding for the professional development of SSD staff is recommended. It is vital for SSD staff to stay abreast of changing legislation that impacts accommodations for students. This knowledge is necessary to protect not only the student being served but also the University and faculty/staff serving this population. As Virginia Tech continues to grow, not only in number of students but extended campuses and specialized programs (VT Carilion School of Medicine), staying abreast of legislation for these specialized populations is increasingly important. Staff should attend at least one professional development conference per year. Currently, SSD's budget allows for only two of the ten professional staff members to attend the National AHEAD (Association on Higher Education and Disability) Conference. The average cost of attending the National AHEAD conference is \$3,100 per person (this cost is largely dependent on location). AHEAD offers other educational opportunities that could be explored by SSD, and other organizations, like Disability Rights, Education, and Mentoring (DREAM) and the Society for Disability Studies (SDS) may have other opportunities as well. It is recommended that \$1,800 per professional staff member be allocated for professional development.

Question 4: What additional policies and procedures, if any, need to be developed to address the use of service animals as approved accommodations? (pending new legislation)

Under the ADA (see Q2), a service animal (SA) is defined as a dog or miniature horse that has been individually trained to do work or perform tasks for a handler with a disability. Under the Fair Housing Act (see Q2) Assistance/Support Animals (ASA) provide physical and/or emotional support to individuals with disabilities. Virginia Tech recognizes the importance of both SAs and ASAs in the roles they play for individuals with disabilities on our campus.



The task(s) performed by the SA must be directly related to the handler's disability (e.g., navigation, assistance during a seizure, retrieving/carrying necessary items). In situations where it is not obvious that the dog or horse is a service animal, SSD staff may ask only two specific questions: (1) is the dog or horse a service animal required because of a disability? and (2) what work or task has the dog or horse been trained to perform? SAs are treated as medical devices and not as an accommodation.

Handlers and their SAs are welcome in all public spaces on the campus. However, the SSD Office at Virginia Tech is the primary authorized body to determine the presence of SAs in non-public spaces (e.g., classrooms). The university's ADA office is the authorized body for this determination for university employees.

ASAs (sometimes called emotional support animals or ESAs) provide relief solely through their physical presence, rather than by the completion of some set of tasks. ASAs are not individually trained for a set of tasks or services for their owners. ESAs are not limited to dogs and miniature horses and can be any other species of animal. In order to bring an ESA to campus, the owner must contact SSD no less than 30 days prior to arrival in order to permit time to conduct an interactive process. Students have to secure an accommodation for an ASA which requires students to go through an interactive process with SSD. Necessary papers to register an ASA at Virginia Tech includes a Special Housing Accommodations Packet available on the SSD website. Documentation is crucial to having an ASA on campus.



In our survey of peer institutions, the overwhelming majority do not allow ASAs in the classrooms, although they do allow them in housing as required under the Fair Housing Act (but verification for the ASA must be obtained from Residence Life offices in addition to SSD). At Virginia Tech, we follow best practices, meaning we generally require students to provide a letter from a medical provider who can attest to the nexus between the individual's disability and the need for an animal to provide emotional support while living in a residence hall. It is very rare for us to support a request for an ASA outside of the living environment as an accommodation.

The Task Force concurred that outreach and education around the differences between SAs and ASAs is needed across the Virginia Tech campus for students, faculty, staff, and others (e.g., families of students) and makes the following recommendations:

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1. Increase awareness around what makes an animal a SA as opposed to an ASA could alleviate many issues that arise on campus. For example, faculty have raised strong concerns about students bringing animals into laboratory courses during which live animal models are used for instruction and bringing ASAs into lecture spaces where other students may have allergies or adverse feelings about the kind of animal coming into the class (e.g., dog phobia). In general, ASAs are not allowed in classrooms so this is a misperception of the course instructors and students.
2. Better education of definitions and requirements that are easily accessible (e.g., on the SSD website) would be very helpful, as all members of the university community need to understand and adhere to Virginia Tech's guidelines (https://www.ssd.vt.edu/content/dam/ssd_vt_edu/assets/docs/VirginiaTechGuidelinesonServiceAnimalsandAssistanceSupportAnimals.pdf).

Question 5: Are there improvements that may be made to better coordinate the actions of SSD and the colleges to provide seamless accommodations to students in a timely manner?

Overall, current Virginia Tech students find the SSD Office a place of assistance and support, but are frustrated with long wait times for appointments and for securing their accommodations. In considering ways to improve their experiences, we looked at the responsibilities of the student in securing accommodations as well as the responsibilities of the course instructor in supporting a student's accommodations.

The current model employed by SSD is that faculty/instructors are responsible for meeting privately with students who deliver an accommodation letter to them in order to establish the means of providing the requested accommodation(s). Importantly, course instructors must have adequate time after receiving a student's accommodation letter to make appropriate arrangements and this is explained to students receiving the accommodation letter from SSD. Course instructors are responsible for providing the requested accommodations, as approved by SSD in the accommodation letter, in a reasonable and timely manner after the student notifies them, without expecting the student to send reminders to the faculty member about their accommodations. Course instructors are encouraged to consult with SSD whenever concerns arise about accommodations or procedures. Faculty do have the right to request clarification on the reasonableness of an accommodation. This is communicated to faculty on the back of the student's accommodation letter, and on the front of the letter with specific accommodations that encourage the faculty member to contact SSD if they have questions about the accommodation.

Additionally, course instructors are strongly encouraged (via the SSD website) to include the following in all course syllabi:

Virginia Tech welcomes students with disabilities into the University's educational programs. The University promotes efforts to provide equal access and a culture of inclusion without altering the essential elements of coursework. If you anticipate or experience academic barriers that may be due to disability, including but not limited to ADHD, chronic or temporary medical conditions, deaf or hard of hearing, learning disability, mental health, or vision impairment, please contact the Services for Students with Disabilities (SSD) office (540-231-3788, ssd@vt.edu, or visit www.ssd.vt.edu). If you have an SSD accommodation letter, please meet with me privately during office hours as early in the semester as possible to deliver your letter and discuss your accommodations. You must give me reasonable notice to implement your accommodations, which is generally 5 business days and 10 business days for final exams.

Collectively, there appears to be room for improvement in terms of the processes for both securing accommodations from SSD and in implementing accommodations in the classroom. The following recommendations for changes to the process of implementing accommodations between students and their academic partners will be necessary to achieve our aspirational goals:

1. Educate all parties that it is not the student and faculty who negotiate the accommodation per se, but rather SSD and the student who decide on the accommodation after an interactive

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process. However, guidance from course instructors may be necessary and highly advantageous, depending on the nature of the accommodation.

2. In addition to providing a centrally located space for testing (e.g., extended test times; quiet spaces), also provide a digitally-friendly mechanism for faculty to upload exams that will be given in these spaces.
3. Purchase and implement a new disability services database management system that would allow students to request accommodations online and increase efficiency in disability documentation review, easily facilitate transition to a case management approach, coordinate testing accommodation services with faculty, effectively reducing student wait times. SSD should purchase a software program designed specifically for managing disability services/offices. With a new software program, the SSD Office will be able to collect, store, sort and analyze data related to all functions of this office and its services more easily, streamline many of the office's processes, and increase response times for services.

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Question 6: How may SSD and associated offices educate and support faculty and department heads in implementing services for students?

It is critical that an integrated, team approach is taken in educating and supporting efforts between SSD and our course instructors in implementing accommodation services for VT students. In order to provide seamless accommodations to students when necessary, there needs to be continual and sustainable best-practices on campus for disseminating information to necessary constituents. This generally falls under the rubric of 'outreach', and the SSD Office at Virginia Tech has many such efforts underway. For example, the SSD Office has developed a digital volunteer note taker request form available to all course instructors that is easy to fill out for a student(s) in their class needing this accommodation. Once submitted by an instructor, the SSD Office collects the responses from potential note-takers in the class and arranges the transmission of notes between students. This is an extremely efficient and effective way to aid faculty in delivering an accommodation to a student with a disability.

Nonetheless, there are ways to improve in our outreach efforts. For example, one SSD director at a comparison institution meets with 60 department chairs in one year as part of their outreach efforts, specifically targeting those departments with the most students with disabilities in their courses or disciplines. Forming these kinds of positive relationships between representatives from the SSD Office and the administration/staff on our campus would improve the path of implementation of accommodations for students with disabilities.

The following recommendations for best practices in ongoing education and support of our administrators, faculty and staff will be necessary to achieve our aspirational goals:

1. Encouraging faculty to design their courses with accessibility in mind will provide more opportunities to satisfy accommodations. There could be workshops offered through Virginia Tech's Network Learning Institute (NLI) in innovative course design that addresses typical disabilities in today's college population. NLI is a centralized, cross-discipline professional development program available to all Virginia Tech faculty, staff, and graduate students.
2. Create more information on the SSD website with contributions from faculty and educators who have successfully designed their courses to be more accommodation-friendly and proactive. It is essential that these instructional webcasts have transcripts and/or closed captioning so that they are accessible to all interested viewers.
3. Create a secure digital platform that faculty can easily access to check on students in their classes that have received formal accommodations from SSD. The faculty should be able to tag students who have approached them and informed them about their accommodation v. those students who have not. A faculty member who then notices that a student is struggling and they have not activated their accommodation can use the Navigate system to issue an alert to SSD. SSD can then reach out to the student to ascertain if there are barriers to them activating their accommodation or if any additional assistance is needed.
4. SSD can contact faculty during the week before classes begin to make them aware that they have x number of students in their class with the x number of approved accommodations and a list of what those accommodations will be should the student choose to initiate the approval.
5. Provide the SSD counselor name on the accommodation letter in case faculty need to consult with someone knowledgeable about both the accommodation and the responsibilities of all parties.

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6. Develop online training modules for existing faculty as well as faculty transitioning into the institution around accessibility and accommodations. These would always be accessible to the entire VT community and they should be updated periodically, as needed. There could be different themes/topics covered in different modules. Perhaps VT students studying various forms of communications (marketing, journalism, PR, podcasting, etc.) could be involved in designing these learning tools as part of a course (or capstone) project. This could reduce the cost of creating these modules and it would enhance visibility and cross-disciplinary collaboration. SSD would of course be involved in the process and would check for accuracy of content, appropriateness of language, etc.
7. Establish an advisory board within the SSD Office that bring faculty, SSD representatives, alumni, community leaders, business executives, etc. together through issues that arise for students with disabilities across the campus.

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**Appendix 1
Services for Students with Disabilities
Student Usage**

SSD STUDENT STATUS	NUMBER OF STUDENTS SERVED					
	FY11-12	FY12-13	FY13-14	FY14-15	FY15-16	FY16-17
Current Registered	743	833	889	1,213	1,131	1,157
Referral Students	411	490	515	580	599	715
Prospective Students	170	176	201	199	196	245
Temporary Disability Students	20	33	45	51	85	99
Auxiliary Students	7	12	37	18	20	23
Status Change (students had one or more status and it changed during the year)	280	308	334	360	449	486
TOTAL STUDENTS SERVED (Unduplicated count = Current + Referral + Prospective + Temporary + Auxiliary - Status Change)	1,071	1,236	1,353	1,701	1,605	1,738
% Diagnosed K-12	50%	49%	51%	55%	55%	N/A
% Diagnosed in College	50%	51%	49%	45%	45%	N/A
<i>Freshman</i>	11%	14%	14%	10%	6%	N/A
<i>Sophomore</i>	11%	13%	9%	13%	13%	N/A
<i>Junior</i>	16%	11%	14%	8%	14%	N/A
<i>Senior</i>	7%	9%	5%	8%	7%	N/A
<i>Grad/PhD/VetMed</i>	5%	4%	7%	6%	5%	N/A
	TYPE OF STUDENT SERVED ⁶					
	FY11-12	FY12-13	FY13-14	FY14-15	FY15-16	FY16-17
ADHD Disabilities	339	426	471	640	552	N/A
Learning Disabilities	339	370	373	513	439	N/A
Psychological Disabilities	168	199	206	292	305	N/A
Medical Disabilities	132	138	146	187	175	N/A
Deaf and Hard of Hearing	22	24	19	24	25	N/A
Autism Spectrum Disorders (formerly Pervasive Developmental Disorders)	21	30	35	46	35	N/A
Mobility Impairments	10	12	11	13	11	N/A
Vision Impairments	9	13	13	22	22	N/A
Traumatic Brain Injuries	8	12	16	29	34	N/A
Communication Disorders	4	2	3	5	7	N/A
Number of students represented in at least TWO of the categories above	259	324	348	468	399	N/A
TOTAL STUDENTS SERVED	1,311	1,550	1,641	2,239	2,004	N/A

⁶ Students can have multiple disability categories, so total does not match Current Registered Status

Appendix 2
Services for Students with Disabilities
Testing Center Data

Spring Semester 2018

Total Requests for Testing	3,187
Total Initially Rejected - Rescheduled	257
Total Rejected-Unable to Reschedule	86
Percentage Rejected (unable to reschedule)	3%

Spring Semester 2019

Total Request for Testing	3,709
Total Rejected - Rescheduled	212
Total Rejected-Unable to Reschedule	89
Percentage Rejected (unable to reschedule)	2%

**Appendix 3
Software Platforms**

	ACCESSIBLE LEARNING	CLOCKWORK	SYMPPLICITY
Description (per software website)	<p>Accessible Learning is customizable, allowing you to find a solution that fits your needs and budget. Our yearly maintenance fee is based on the number of modules and the number of current students you are serving (calculated on a yearly basis). Our software allows you to archive student data and re-activate files later at no additional cost. We serve campuses with as little as 25 students with disabilities to multi-campus systems with over 3000 students.</p> <p>It is our commitment to provide an exceptional level of service to our customers, no matter the size. We serve campuses with as little as 25 students with disabilities to multi-campus systems with over 3000 students. It is our commitment to provide an exceptional level of service to our customers, no matter the size.</p>	<p>ClockWork is the most versatile software available that's specifically designed to meet the custom needs of various student service departments in Universities and Colleges across North America.</p> <p>ClockWork has been an ultimate choice of product for scheduling as it has been developed based on the Ideas from different institutions which made it a secure and a flexible scheduling management software for higher education.</p>	<p>Symplicity is an automated digital system to replace paper, keep registered students informed, and involve faculty and staff members of approved requests. Track and monitor your office's entire equipment inventory and keep track of the status, location, and condition of each item. Bring together registered students and approved note-takers for every class and section.</p> <p>Eliminate duplicate work, digitize the notes and make it easy for everyone. Give registered students a real-time view of available rooms and automatically calculate exam times based on approved accommodations. Then, coordinate with faculty to inform them of special instructions. Give your students a virtual view of your staff's calendars so they can book at mutually beneficial times and eliminate wasteful back and forth or long waits during open office hours appointment booking.</p>
Year started	2008	2002	1997
Base Cost	\$8,602.00	\$8,585.00	\$14,000.00
One-Time (set-up/migration)	\$2,450.00	\$1,600.00	\$12,000.00
Modules available	16	15	16
Module price range	\$1,000 - \$2,000	\$350 - \$1,495	\$1,000-\$1,850