



**REPORT OF THE**

**ADA COMPLIANCE REVIEW TASK FORCE**

**May 2006**

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<sup>1</sup> If you are unable to access any of the documents in the appendices, please contact Jan Waterhouse in the Office of Equal Opportunity and Diversity at 335-0705 (voice) or 335-0697 (text) or by e-mail at [diversity@uiowa.edu](mailto:diversity@uiowa.edu).

## **EXECUTIVE SUMMARY**

Diversity is one of the University's five primary goals as defined in *The Iowa Promise: A Strategic Plan for the University of Iowa 2005-2010*. Specifically, the University's goal relating to diversity is "to promote excellence in education by increasing the diversity of the faculty, staff, and students." Disability is recognized as an important facet of diversity. One of the identified strategies for achieving this goal is, "Creating a more welcoming and accessible environment for faculty, staff, students, and visitors with disabilities."

The ADA Compliance Review Task Force found that the University is in compliance with the requirements of the Americans with Disabilities Act (ADA). In some areas, however, the University should aspire to improve accessibility beyond the minimum requirements of the ADA, in keeping with the strategy identified in *The Iowa Promise* to create a more welcoming and accessible environment for individuals with disabilities.

The task force evaluated the status of ADA compliance in each of the following key areas of campus:

**Campus Facilities.** University facilities that have been constructed since the passage of the ADA have been designed to be in compliance with the Americans with Disabilities Act Accessibility Guidelines (ADAAG), as have renovations to existing facilities. Individual needs of faculty, staff, or students with disabilities are addressed on a case-by-case basis to ensure accessibility.

**Information Technology.** Accessibility in the Information Technology (IT) field is an evolving field. Section 508 of the Rehabilitation Act governs web accessibility for the federal government, but does not directly apply to the University. However, the ADA requires all University programs to be accessible which may include electronic or web-based resources. The University has taken steps to improve the accessibility of its IT resources. For example, assistive technology is available in ITC's across campus. In addition, the Office of the Chief Information Officer has developed a set of Accessibility Standards for Web Resources to provide guidance for web designers to improve the accessibility of the University's web pages and electronic resources. It is recommended that the University focus on this developing area to make our campus – which includes electronic resources – more welcoming and accessible to all individuals.

**Student Services.** The process for providing reasonable academic accommodations to students with disabilities is working well. Because some colleges on campus utilize their own review processes for evaluating requests for accommodation, the University might benefit from a review to ensure that all of the different processes are consistent. In addition, it is imperative that all faculty and teaching assistants be provided with information about how to appropriately provide reasonable accommodations in the classroom.

**Employment.** In the employment context, University policy ensures equal employment opportunity for individuals with disabilities and endeavors to provide reasonable accommodations for individuals with disabilities. The University's process for providing reasonable accommodations has shifted from being a very centralized system to largely being administered by individual departments with assistance from Faculty and Staff Disability Services (FSDS). As a result of this shift, there is a perception that the accommodation process may not be applied consistently across campus. The University may benefit from greater centralization of the accommodation process, which would necessitate additional resources being allocated to FSDS.

**Parking and Transportation.** The University's parking and transportation facilities meet the basic requirements of the ADA, and accessibility will continue to be a primary consideration in future planning and development. Future development will improve the availability of accessible parking in the Hospital Parking Ramps, an area in which demand for accessible parking currently exceeds the availability. The process for assigning accessible parking to faculty and staff with disabilities should be reconsidered to determine whether assignments could be made in a more timely fashion.

Through the various subcommittee reports, the Task Force has found that the efforts of individual offices such as Student Disability Services (SDS) and FSDS are effective in providing basic services to individuals with disabilities on our campus. However, better coordination of these and other efforts among various offices is needed in order to provide more effective and timely solutions to specific needs and requests. For example, it would be helpful to identify a single location where accessibility issues, particularly relating to facilities accessibility, could be raised. In addition, information relating to disability services and accessibility issues should be more readily available to the University community members and visitors.

### **Summary of Recommendations**

Based on the various subcommittee reports, the Task Force has identified the following general recommendations:

1. Identify a single office where concerns about accessibility should be raised. This office would be responsible for coordinating the appropriate response by calling together all necessary offices and resources to identify and implement an appropriate resolution, and for informing the inquirer of the solution and implementation schedule.
2. Create a page on the University of Iowa website devoted to disability resources. This page would contain links to University of Iowa information, resources, and policies related to disability and accessibility.

3. A committee should be assembled to monitor the progress toward meeting the other goals identified in this report and to provide regular status reports to the President.

Following are the recommendations made by each subcommittee. Further explanation of the subcommittee recommendations is found within the various subcommittee reports.

### Campus Facilities Recommendations

1. Continue the effort to provide accessible academic programs, and to improve access to buildings and to public amenities within facilities where practical.
2. Design and implement a formal process for the submission, review and timely resolution of accessibility concerns. The process should insure that the requesting person(s) be involved in proposing and evaluating possible solutions to the concern.
3. Expand the Accessibility Guide on the web site to include the ability for an interactive program similar to the commercial program "MapQuest" as the University develops its electronic capacity.
4. Include University accessibility standards in the Facilities Management Design Manual. Develop a formal process for individuals to submit recommendations for material to be included in the Design Manual, including notification to the requester of the final action taken.
5. Increase the collaboration between Facilities Management, Student Disability Services, and Faculty and Staff Disability Services to gather meaningful input on accessibility issues. Such collaboration would be especially valuable in facilities planning and design, and in creating University accessibility standards.

### IT Recommendations

1. Create a full-time web accessibility coordinator position charged with managing, coordinating and promoting web accessibility on campus.
2. Enhance/increase learning opportunities for web developers, IT managers, and faculty.
3. Revise, approve and promote the Accessibility Standards for Web Resources developed by the Office of the Chief Information Officer (CIO).
4. Conduct a rigorous review of top-level UI web pages.

5. Develop and implement procurement policies and guidelines for the purchase, lease, or acquisition of online resources that ensure these resources are accessible.

#### Student Services Recommendations

1. Carefully review the various accommodation procedures in the colleges that do not utilize SDS, to determine whether there are any inconsistencies that could create legal risk for the University. Such a review could be coordinated by the University's ADA Coordinator.
2. Develop and implement a plan to provide training and/or information to faculty, teaching assistants, student employees, and staff relating to legal requirements, reasonable accommodations, and other disability-related topics. This plan could be developed through collaboration among the Office of Equal Opportunity and Diversity (EOD), SDS, and academic and service units.
3. SDS should evaluate the possibility of expanding exam service hours to better meet students' needs. An expansion of SDS exam services would significantly increase the quality of these services and their benefits to students.

#### Employment Recommendations

1. Fully implement the policy mandate that all ADA accommodations are processed through and coordinated by FSDS, provided that resources could be allocated to support additional FSDS staffing.
2. Implement follow-up evaluations with employees receiving reasonable accommodations to assess the effectiveness of and satisfaction with the accommodations provided.
3. Provide additional staffing in FSDS to meet basic service needs.
4. Increase the visibility of disability in University employment life and communications.

#### Parking and Transportation Recommendations

1. When funding is available, Cambus should replace its current lift-equipped fleet with low floor, ramp-equipped buses.
2. Assemble a committee involving active Bionic riders to review the effects of focusing the service area of the Bionic Bus (specialized service) into the main campus and its immediate surrounds to improve on-campus service levels.

3. Work through Johnson County Council of Governments (JCCOG) to maintain and improve coordination among local transit providers, with a focus on improving the coordination between the specialized services.
4. When the Melrose Avenue Parking Facility expansion opens, convert twenty-seven (27) standard parking spaces on the east side of Level 4 in Hospital Ramp 2 (HR2) into seventeen (17) ADA spaces, bringing the total number of ADA spaces within HR2 to seventy-five (75).
5. Work with the Offices of SDS and FSDS to rewrite the ADA parking assignment policy for employees and students by July 1, 2006.
6. Continue to focus on enforcement of ADA spaces and encourage reporting of violations to Parking Field Services Officers by members of the public and the University community.
7. Work jointly with SDS, FSDS, Facilities Management and other service units who need vehicular access to pedestrian ways to ascertain where and when these instances occur and how they might be prevented or discouraged. Raise awareness of the impact of such a blockage.
8. Install an electronic sign package that will allow Parking to provide a timely forewarning to the public when an elevator in North Parking Ramp or the IMU Parking Ramp is closed.
9. Raise awareness of the existence and functions of service animals, and of the policy supporting their use, by continuing to train drivers on the importance of service animals and by informing riders of the driver's role in screening boarders.
10. Form a working group with members from SDS, FSDS, Facilities Management, UIHC grounds and Parking and Transportation. This group would review current practices and provide input to operations crews during the snow season.
11. Install automatic door openers in all public access doorways that are part of University parking structures, by the end of FY 07. Approximate cost of project is \$75,000.
12. Finalize plans with the City to increase the number of ADA spaces adjacent to the University Capitol Centre. As permits become available for use within the Old Capitol Ramp, increase the number allocated for assignments to persons with disabilities.

13. Continue to review activity at the pedestrian crossing between the Newton Road Parking Ramp and the Medical Education and Biomedical Research Facility (MEBRF) to determine if further action is required.
14. Improve contact with venues, organizations, government services and University departments who host special events to review the parking plans developed for their events. Include special event planning in a Parking and Transportation outreach effort.

## **I. INTRODUCTION AND CHARGE**

On March 29, 2005, President David J. Skorton appointed and charged the ADA Compliance Review Task Force (Task Force) with conducting a campus-wide review of the University's compliance with the Americans with Disabilities Act of 1990 (ADA). The review was to encompass all aspects of accessibility including, but not limited to, the following:

- Facilities accessibility,
- Web/electronic resources accessibility,
- Procedures for providing reasonable accommodations in employment and academics, and
- Accessible parking and transportation on campus.

## **II. REVIEW PROCESS**

The Task Force began its work by reviewing several ADA self-evaluation reports previously completed by the University. A comprehensive self-evaluation was completed in 1993 and updates had been completed since that time. The following reports were made available to and reviewed by the Task Force:

- Americans with Disabilities Act Self-Evaluation Report, January 1993
- Americans with Disabilities Act Self-Evaluation Review, October 1996
- Report on the Subcommittee on Campus Accessibility for Students, August 1998
- Campus Accessibility Self-Assessment, May 2001

As a next step, the Task Force formed subcommittees to review each of the specified areas, with a Task Force member acting as the chair of each subcommittee. Each subcommittee chair recruited other University community members with relevant expertise to participate in their subcommittee.<sup>2</sup> The subcommittees were formed as follows:

Campus Facilities Subcommittee  
Stephen Buckman, chair

IT Subcommittee  
Molly Langstaff, chair

Student Services Subcommittee  
Dau-shen Ju, chair

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<sup>2</sup> The list of subcommittee membership is found on the inside front cover (page ii) of this report.

Employment Subcommittee  
Jan Gorman, chair

Parking and Transportation Subcommittee  
David Ricketts, chair

Each subcommittee developed and implemented a plan for the review of its area as described in the following sections, and then submitted a subcommittee report to the Task Force. The Task Force formulated this final report based on the various subcommittee reports.

The Task Force held two public forums where community members could ask questions and make comments and suggestions relating to campus accessibility. The first forum was held on October 25, 2005 in the Iowa Memorial Union and drew approximately 35 attendees. The second forum was held on October 31, 2005 in the Center for Disabilities and Development, and approximately 29 attended. The Task Force recorded the comments received and considered them during the review process.

The review included consideration of The University of Iowa Hospitals and Clinics (UIHC) as part of the larger University of Iowa community. As appropriate, the various subcommittee reports have considered and commented upon the accessibility of the UIHC.

### **III. OVERVIEW OF THE ADA**

The ADA contains five Titles, two of which directly apply to the University of Iowa.<sup>3</sup> Title I of the ADA prohibits discrimination in employment against a qualified individual with a disability, and requires employers to provide reasonable accommodations to such individuals unless such accommodations would impose an undue hardship. As an employer, the University is governed by Title I.

Title II of the ADA requires that the services, programs, and activities of public entities be accessible to qualified persons with disabilities. Public entities may not deny a qualified individual with a disability the opportunity to participate in or benefit from the programs or services offered; may not provide such individual with an opportunity to participate that is not equal to that afforded others; may not provide such individual with a service that is not as effective in affording equal

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<sup>3</sup> Title III of the ADA prohibits discrimination against individuals with disabilities in places of public accommodation that are operated by *private* entities, and therefore does not apply to the University. Title IV of the ADA, an amendment to the Communications Act of 2002, applies to all common carriers of voice transmission and therefore does not apply to the University. Title V is entitled "Miscellaneous Provisions" and contains many sections that help to interpret the other Titles of the ADA.

opportunity; and may not provide different or separate benefits or services unless necessary to provide effective services. As a public institution, the University is governed by Title II.

Pursuant to Title II, all University programs, services, and activities, whether academic or non-academic, must be accessible to qualified individuals with disabilities. The requirements of Title II include modifications to policies, practices, and procedures; administering services, programs, or activities in the most integrated setting appropriate; modifications to physical facilities; providing effective means of communication; and providing accessible transportation. Title II is similar in its requirements to Section 504 of the Rehabilitation Act of 1973, which applies to public entities that receive federal financial assistance.

#### **IV. SUBCOMMITTEE REPORTS**

The individual subcommittee reports follow. These subcommittee reports were compiled as independent reports. Therefore, there may be some amount of duplication of information among the subcommittee reports. The Task Force elected to keep the subcommittee reports intact anticipating that some readers may be interested in some, but not all, of the subcommittee reports.

# Report of the Campus Facilities Subcommittee

## **Introduction**

The University of Iowa campus includes approximately 273 state-owned buildings, some of which were constructed long before passage of the ADA and some of which have been constructed since. The Department of Facilities Management is responsible for the planning, construction, operation and maintenance of general fund supported academic and administrative buildings.

## **Scope of Review**

In 2004 Facilities Management began conducting a comprehensive Facility Condition Analysis which includes, among other considerations, an assessment of facilities accessibility. At the end of calendar year 2005, seventy-one (71) reports had been completed which covered sixty-four (64) General Education Facilities, three (3) Athletic Facilities, and four (4) Residence Services Facilities. Currently nineteen (19) additional facilities are under review. The next phase of the assessment will include the Utilities system. These reports will be used to assess accessibility issues when the University is considering renovation work within existing facilities.

## **History of Services Provided**

In the initial self-evaluation published in January 1993 the University acknowledged its on-going responsibility to review its building and construction policies to ensure that the construction of each new facility, the addition to an existing facility, or any alteration of an existing facility after January 1992 conform to the standards designated under the regulations implementing Title II of the ADA. In recognition of these requirements, all construction projects undertaken by the University since January 1992 have been designed in compliance with both the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the applicable provisions of the State of Iowa building codes.

## **Current Status of Services**

The Facility Condition Analysis estimates the cost of making all identified accessibility-related improvements to be \$15,700,000 for the General Education Facilities. The potential accessibility deficiencies were identified using the current state building codes and ADA guidelines. It would not be practicable for the University to correct all of these potential deficiencies in the immediate future. Some of the improvements would be inappropriate alterations for a historically-significant facility. Other possible improvements address design issues that were

appropriate given the building codes at the time the facility was built. Still other improvements will be addressed in a future renovation or addition project. The estimated cost does not address any physical modifications to a facility that are required to meet the need of a specific student, faculty or staff member.

### **Recent Projects, Improvements and Efforts**

The overall accessibility level of the campus continues to improve as a result of accessibility projects, landscape improvements and major renovations. The following changes to the campus and its support systems have been made since the last ADA Self Study in May 2001.

**Renovation of Old Biology and Bio I & Bio II** – Completion of the project replaced antiquated laboratories with state-of-the-art research and teaching laboratories, added an accessible entrance, and provided accessibility at Level 3 between Old Biology and Bio I.

**Medical Education Research Facility** – Completion of the facility provided a modern education facility and state-of-the-art research laboratories.

**Carver Biomedical Research Center** - Completion of the facility provided state-of-the-art research laboratories and a re-constructed tunnel to Westlawn under Newton Road which now provides an interior accessible pathway from Westlawn to Pomerantz Family Pavilion

**Library's South Plaza** - Completion of the project replaced existing ramps, which did not meet current ADA slope guidelines, with walks in compliance with current guidelines.

**Hillcrest Dining and Burge Dining Facilities** – Completion of the projects provided eating facilities in compliance with accessibility guidelines.

**IMU River Terrace and Terrace Room** – When the project is completed there will be exterior access to the River Terrace and a second entrance to the Terrace Room.

**Blank Honors Center** - Completion of the facility provided a modern education facility for the honors program which accommodates students in kindergarten through twelfth grade as well as college students.

**Pomerantz Center** – Completion of the facility provided a modern education and administration facility to be used for admissions, career counseling and placement services.

**Kinnick Stadium Renovation** – Construction that was completed in 2005 provided additional restrooms with accessible facilities and additional ADA

seating spaces and construction to be completed in 2006 will provide access to all levels of the press box.

**Facility Condition Analysis** – An assessment that evaluates the condition of all general education, athletic, residence services, and selected support facilities which included a component that evaluates accessibility. Currently 71 facility assessments have been completed, 19 facility assessments are in progress and the next assessment phase will cover the Utilities system.

### **Review Process**

Given that the Facility Condition Analysis is underway, the Campus Facilities Subcommittee did not undertake an independent audit of all campus facilities. The subcommittee examined the reports generated to date by the Facility Condition Analysis. In addition, the subcommittee considered the feedback and comments that were raised during the two open forums held by the Task Force.

In addition, the Task Force sent an electronic survey (museum survey) to representatives of several museums/auditoriums (Hancher Auditorium, Museum of Art, Natural History Museum, Medical Museum, Karro Athletics Hall of Fame) that are operated on campus and are open to the public, to gather information about the types of disability-related services that are provided to museum patrons.

### **Legal Requirements**

The ADA and the Rehabilitation Act both require that the University's programs be accessible to qualified individuals with disabilities. ADAAG sets forth specific requirements relating to facilities design and accessibility. The ADA does not impose an obligation to retrofit all existing facilities. However, when new facilities are constructed, they must meet ADAAG standards. In addition, when renovations are made to existing facilities, the renovations also must comply with ADAAG standards.

### **Findings**

#### *Program Accessibility*

The physical environment and the policies of the University have been modified to provide program accessibility to persons with disabilities. This has been accomplished by a combination of physical retrofitting of the environment, relocation of programs, and adherence to accessibility guidelines when constructing or modifying facilities. For purposes of compliance with the ADA and Section 504, it is necessary to view the different instructional programs of the University as parts of a whole. Students may take courses from many different disciplines during their academic careers. Therefore, program accessibility is

considered to apply to general University space as a whole and to all persons that are participants in University programs. The accommodations must meet the need for a specific user whether it is for mobility/dexterity impairment, hearing impairment, visual impairment, or other type of impairment.

The subcommittee recommends that the University continue its efforts to ensure the accessibility of its academic programs, including ongoing efforts to improve access to buildings and to public amenities within facilities, where practical. The subcommittee suggests that these efforts be prioritized as follows:

- Program Accessibility Priorities
  - Access to academic programs
  - Access to buildings
  - Access within buildings
- Design Standards for Accessibility
  - Americans with Disabilities Act Accessibility Guidelines (ADAAG)
  - Uniform Federal Accessibility Standards (UFAS)(if applicable)
  - State Building Codes
- Design Consistency – FM Design Manual (addresses design issues unique to the University)
  - Design review with student and faculty/staff disability service providers
  - Design standard for the campus
  - Design consistency with adjacent governing agencies

The museum survey responses indicate that the museums/auditorium provide services to persons with disabilities to provide accessibility to the museums. For example, programs are provided in alternative formats when applicable, sign language interpreters are provided upon request, and service animals are welcome. In addition, Hancher Auditorium has available for check-out assistive devices for individuals who are hearing impaired, and the Museum of Art has some touchable objects available for visually impaired individuals. Most of the responses indicate that the physical facilities are accessible. However, the Task Force is aware that a portion of the Museum of Natural History in MacBride Hall is only accessible by wheelchair by traversing through an auditorium which is sometimes used for classes. When a class is in session in the auditorium, a wheelchair patron may not be able to access that portion of the Museum. One area in which the museums were not consistent is with providing alternative signage. Some have Braille signage while others do not. While Braille signage is not strictly required by the ADA, it does improve accessibility for individuals with visual impairments.

### *Accessibility Review Process*

It has been brought to the Task Force's attention that requests relating to issues of facilities accessibility have not always been handled in a timely fashion. The subcommittee identified two factors that affect the response time. The first factor is that there is no formalized process in place for accessibility concerns to be raised and reviewed so that appropriate remediation of the problem can be achieved and communicated to the requester. The second factor that affects such accommodation requests is that most modifications of existing structures incur cost and there is no central funding source available to non-revenue generating departments to cover such costs. There is an annual allocation of funds within Facilities Management which can be used for accessibility projects for which other funding is unavailable. However, there is a lack of knowledge of this funding source.

The subcommittee recommends that a formal process be designed and implemented for the submission, review and timely resolution of accessibility concerns. The process should insure that the requesting person be involved in proposing and evaluating possible solutions to the concern.

Accessibility projects which could be either facility or site related that are not specific to an individual user will need to be evaluated and developed as a typical project. The University should prioritize such projects whenever possible because they improve accessibility for people with permanent and temporary disabilities (i.e. broken leg), including visitors to campus.

### *Campus Accessibility Guide*

Facilities Management maintains and distributes an accessibility guide to the campus which is in an electronic format on their web site. This guide contains individual building descriptions as well as a campus map showing the location of accessible building entrances, designated accessible parking and emergency telephones. Updates will continue as physical changes to the campus and other circumstances warrant.

The subcommittee realizes that power of web programs can provide information in a format that meets the user's needs. As the University develops its electronic capacity, the sub-committee would recommend that the material information be expanded to include the ability for interactive technology similar to the commercial program "MapQuest." The program could provide a recommended route between a point of departure and a destination, as well as the location of accessible amenities.

### *Accessibility Standards*

The subcommittee realizes that ADAAG and building codes are minimum guidelines for compliance which are used by staff and consultants. These guidelines provide a level of consistency that is needed, but they do not provide design guidance for the uniqueness of a location or for a higher standard that an organization might want to achieve. Items that might be addressed include graphic standards for identifying accessible routes; consistency of ADA features across campus including UIHC, Athletics, Residence Services, and the IMU (such as warning strips at curb cuts); site and building amenities such as picnic tables that accommodate individuals in wheelchairs; multiple wheelchair seating locations in places of assembly with tiered or sloping floors; acceptable distance of travel for a person with a disability; and requirements for areas of refuge.

A Design Manual was developed several years ago and currently a separate Task Force is updating that document. The Design Manual would be a logical location for University-specific accessibility standards. Currently there is no process in place to submit recommendations for material to be included in the Design Manual. The sub-committee recommends that such a process be developed, including notification to the requester of the final action taken. In addition, the subcommittee recommends that resources available in Student Disability Services and Faculty and Staff Disability Services be utilized to provide input relating to accessibility standards.

### *Disability Advocate*

Identifying what modifications must be made to existing facilities to provide accessibility is relatively easy because the impediment is visible. Planning and designing for accessibility in a new building is more difficult because the building plan is two-dimensional. The guidelines identify dimensions, clearances and warning devices, but they do not address material selection, component orientation, and subtle design adjustments that could improve accessibility at (often) little or no additional cost.

The subcommittee recommends that Project Managers better utilize available resources, including personnel within Student Disability Services and Faculty and Staff Disability Services, to provide meaningful input on accessibility issues during the planning and design phases of new facilities development.

### **Subcommittee Recommendations**

1. Continue the effort to provide accessible academic programs, and to improve access to buildings and to public amenities within facilities where practical.
2. Design and implement a formal process for the submission, review and timely resolution of accessibility concerns. The process should insure that the requesting person(s) be involved in proposing and evaluating possible solutions to the concern.
3. Expand the Accessibility Guide on the web site to include the ability for an interactive program similar to the commercial program "MapQuest" as the University develops its electronic capacity.
4. Include University accessibility standards in the Facilities Management Design Manual. Develop a formal process for individuals to submit recommendations for material to be included in the Design Manual, including notification to the requester of the final action taken.
5. Increase the collaboration between Facilities Management, Student Disability Services, and Faculty and Staff Disability Services to gather meaningful input on accessibility issues. Such collaboration would be especially valuable in facilities planning and design, and in creating University accessibility standards.

# Report of the IT Subcommittee

## **Introduction**

Electronic resources are an essential part of The University of Iowa today. Campus web pages and applications and electronic resources embody much of our University's collective knowledge and learning. These electronic resources have become a critical aspect of most facets of the University. As estimated in the 2005-6 campus-wide review of information technology (IT), the University spends over \$100 million dollars annually<sup>4</sup> on IT resources, staffing and support.

## **Scope of Review**

The IT subcommittee reviewed the University's policies and practices regarding electronic resources, as well as the physical resources that provide access to these technology resources. The subcommittee also interviewed web developers and designers and other stakeholders within the university community, and conducted an informal survey regarding their experience, expertise and opinions regarding web-resource accessibility. This report includes an overview of accessibility of the following:

- Web resources
- UI-developed software
- ITC's (Instructional Technology Centers)
- IT policies relating to accessibility
- University IT resources supporting technology accessibility

## **History of Services Provided**

Services relating to the accessibility of IT at The University of Iowa first received attention in the early 1990's, as a response to the Americans with Disabilities Act (ADA) of 1990 and to an increase in IT's role in the educational and administrative processes of the University.

The University of Iowa's ADA Self-Evaluation in 1993 recommended the creation of a position dedicated to assisting UI persons with the use of specialized hardware and software for accessing electronic resources and information technologies.

Further attention to electronic resource accessibility can be seen in the University's 1996 ADA Self-Evaluation, which commented on the increased presence of specialized hardware and software for persons with disabilities in our campus ITCs.

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<sup>4</sup>2005-6 Campus IT Review, <http://cio.uiowa.edu/itreview/>

In recent years, the focus of electronic resource accessibility on campus has shifted from a model based largely on providing computers with special accessibility tools to improving the accessibility of the electronic resources themselves. As the creation of electronic content became more pervasive and decentralized on campus, the question of whether these new, sometimes impromptu, resources were accessible to persons with disabilities became germane. In response to that question, a committee convened in 2002 to create a set of University standards regarding the accessibility of web resources. The committee developed a draft of the policy *Accessibility Standards for Web Resources* which is available on the Chief Information Officer's web site (<http://cio.uiowa.edu/policy/WebAccessibility.shtml> ).

### **Current Status of Services**

At present, IT resources play an integral role in most every facet of the University's operation and mission. A recent review of resources indicates that more than \$100 million will be spent in FY '05/'06 on IT procurement, implementation and support.

#### *Web Resources*

Key University web services/resources include:

- [www.uiowa.edu](http://www.uiowa.edu) (official University web presence)
- ICON Course Management System
- ISIS Registration System
- HR Self-Service
- Hawkeyesports.com
- UI Libraries
- Collegiate\Departmental\Program\course web pages

Currently, no specific University unit is chartered to manage the accessibility of UI web resources and applications. However, several campus groups offer *informal* assistance in understanding, evaluating and designing accessible web resources:

- ITS Academic Technologies
- ITS Campus Services
- The UI Law, Health Policy and Disability Center
- The College of Law's Clinical Law Programs
- The Iowa Center for Assistive Technology Education and Research (ICATER)
- The UI Center for Disabilities and Development
- The Iowa Program for Assistive Technology

In addition, the *Accessibility Standards for Web Resources* have existed in draft form for three years but have not gone through the process to gain University-wide approval.

### *Physical Computer Resources*

The University of Iowa's computer fleet includes more than 15,000 desktop, laptop and server computers spread across the University's numerous colleges and administrative units. To assist students and employees with accessibility issues surrounding the use of these computers, a half FTE position within ITS Campus Services provides hardware and software accommodations to students, faculty and staff.

These accommodations are provided on a referral basis, with requests for accommodations originating primarily from Student Disability Services and Faculty/Staff Disability Services.

In addition to these personalized accommodations, this position also supports specialized assistive technology implementations in campus ITC computer labs. These computer lab implementations allow students, faculty, staff and the general public to access hardware and software specifically designed to facilitate computer use by persons with disabilities. In addition to this centralized support resource, Student Disability Services and the Iowa Center for Assistive Technology Educational Resources (ICATER) provide assistance in training and fitting users for the use of assistive technologies.

### **Review Process**

Given the breadth of electronic resources present at The University of Iowa and the limited time and resources for this review, the IT subcommittee took a high-level approach to reviewing University electronic resources. Our committee:

- Interviewed selected top-level web administrators and application developers concerning their perspectives on accessible web and application design.
- Surveyed the Campus Webmaster's group concerning accessible web design knowledge and application. (The survey instrument is attached, Appendix A.)
- Solicited feedback on ITC computer lab accessibility from Campus Services.
- Investigated individual comments from ADA open forums and e-mails which addressed the following:
  - Accessibility of public computers
  - Assistance for creating "ADA Compliant" web pages.
  - Funding for web accessibility resources
  - Accessible data entry for University web pages

- Vagueness of accessibility rules
- Web accessibility coordinator

### **Legal Requirements Specific to IT Accessibility**

The University of Iowa has committed to “maintain and enhance a culturally diverse and humane University community” as one of the Fundamental Principles in the 2000-2005 Strategic Plan. The diversity that we strive for and embrace involves many factors, including disability. The University believes that every individual should have an equal opportunity to contribute in the classroom or the workplace based on his or her knowledge and skills, without regard to disability.

The University endeavors to provide equal access to its programs, services and activities, to administer its programs, services and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities. To that end, the University makes reasonable modifications to its policies, practices and procedures necessary to avoid discrimination, furnishes auxiliary aids and services when necessary to ensure effective communication and makes reasonable accommodations for the functional limitations of applicants, employees, and students with disabilities. Such actions are required by the Americans with Disabilities Act of 1990 (ADA) and the Rehabilitation Act of 1973. The University supports and complies with these laws not simply because it is required, but also because of our commitment to fair and equitable treatment of all members of the University community.

### **Findings**

#### **Summary of Findings**

- The large amount of web content created by non-professional web developers (faculty, staff, students) often presents accessibility issues to persons with disabilities within the University and its global community and presence.
- Most professional developers are aware of accessibility issues and make good faith efforts to design sites with accessibility in mind, but vary in their expertise and understanding of accessible web design.<sup>5</sup> This variance in expertise results in campus web sites offering inconsistent levels of accessibility.
- Web designers on campus would like more concise information concerning the specifics of what constitutes an “accessible” web resource.
- Accessibility features are not an essential consideration when new online resources and software packages are purchased or contracts for externally-hosted IT products are evaluated.

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<sup>5</sup> This variation in expertise and understanding of accessible web design can be seen amongst web designers regarding issues of expertise unrelated to accessibility as well.

- Faculty, staff and students would benefit from training on what constitutes good web design and how people with different functional abilities use and access computers, adaptive equipment and assistive technology.

## **Detailed Findings & Observations**

### *Professional Web/Application Developers*

- Most professional web developers on campus are aware of accessibility issues with certain design methods for electronic resources.
- Most professional web developers on campus indicate they have average or below average knowledge of accessibility issues.
- Most professional web developers put a “good faith effort” into designing their pages to be accessible.
  - In doing so, they use a wide variety of tools and methods which sometimes produce different results.
  - Some developers would like to have access to better tools for ensuring web sites meet accessibility standards.
  - There are widely varying interpretations of what constitutes an “accessible electronic resource.”
- A few professional developers would like access to more powerful tools for accessibility testing (screen readers, LIFT software).
- Several groups consulted with extra-departmental staff members in evaluating the accessibility of their web sites.
- Several professional developers consider who the intended audience of a tool is when considering accessibility applications.
  - The consensus among these developers was that accessibility was especially important for applications delivered externally (student resources, resources for *all* faculty/staff vs. a *known* audience).
- Many developers indicated they believed good user interface design is *congruent* with accessible interface design.

### *Complaints\Questions about Accessibility of Electronic Resources*

- A majority of professional web developers have not retrofitted any electronic resources in the last 18 months.
  - Those that had completed a retrofit estimated the completion time depended on the complexity of the resource to be modified.
  - Several developers indicated retrofitting occurred with a total architectural revamp of their site.
  - A small group of developers indicated they had received questions/complaints concerning the accessibility of their web resources.

### *Concerning the draft Accessibility Standards for Web Resources*

- Most professional developers were aware that a draft web policy existed but were unaware of the specific details contained in the policy.
  - Most of these developers were not aware of the value of having a link from their web pages to information about accessibility, which is recommended in the Accessibility Standards for Web Resources.
- Many professional developers would prefer clearer guidelines about what constitutes an accessible web page.

### *Public Computing Facilities*

- The degree of computer accessibility in public computer labs varies by location on campus.
- ITS Campus Services maintains specialized hardware for persons with disabilities in seven ITC computer labs across campus. Specialized software for persons with disabilities is available in most every ITC computer lab on campus.
- ITC computers are set up to allow the installation of many types of assistive technology hardware devices (alternative mice, keyboards) as user needs dictate.
- ITS Campus Services ITC staff work regularly with Student Disabilities Services to ensure computer lab accessibility features meet the needs of students on campus.
- ITS Campus Services provides ad hoc technology accommodations in computer labs and classrooms on campus as requested.

### *Other Observations*

- Professional web designers/developers do not account for a majority of the online content on UI web sites.
- Many course documents and web resources created for online distribution are not readily accessible for persons with disabilities.
  - Of particular note is the challenge that faculty/staff-created PDF documents pose to students requiring alternative text formats (audio texts, Braille documents, etc).
- Accessibility issues are problematic with some purchased software solutions and externally maintained electronic resources.

## **IT Subcommittee Recommendations**

### **1. Create a full-time web accessibility coordinator position charged with managing, coordinating and promoting web accessibility on campus.**

Responsibilities for this new position would include:

- Offer training on accessible web design to campus web developers, faculty and other contributors to the University's online presence.
- Assist key web resource managers in evaluating the accessibility of their sites.
- Assist key web resource developers in implementing accessible technology solutions through consulting or outsourcing web development to campus groups who provide such services.
- Facilitate, track and manage the resolution of complaints concerning the accessibility of web resources, in collaboration with the Office of Equal Opportunity and Diversity.
- Coordinate and manage various on-campus and off-campus resources and tools for accessible design.
- Manage and promote an evolving set of guidelines concerning accessible web design and content creation.

We envision this position would have both a technical and non-technical role in affecting the accessibility of web resources, and hence should have a reporting structure that fosters accountability in both realms.

### **2. Enhance/increase learning opportunities for web developers, IT managers, and faculty.**

We recommend implementing training programs to increase understanding concerning accessible web design to address the wide discrepancy in knowledge amongst our professional web developers, and to address the general lack of accessibility awareness among non-professional web publishers. We envision this training to be:

- Integrated as a facet of general web development/web publishing whenever possible.
- Based on the concept of accessible *design*, rather than on tool-based accessibility testing.
- Coordinated by the web accessibility coordinator recommended above.

**3. Revise, approve and promote the Accessibility Standards for Web Resources developed by the CIO Office.**

We recommend that a campus committee be convened to:

- Revise the current Accessibility Standards for Web Resources to reflect current resources and technologies.
- Distill the revised Accessibility Standards for Web Resources into clear guidelines which are applicable for specific campus constituents, including Web application developers, and faculty/staff web content publishers

Once revised to the satisfaction of University administration, this policy and its accompanying guidelines should be approved and promoted to campus as an integral part of the University's diversity policies.

**4. Conduct a rigorous review of top-level UI web pages.**

We recommend the University, under the guidance of a Web Accessibility Coordinator, complete a comprehensive review of high-traffic and high-profile campus web resources.

**5. Develop and implement procurement policies and guidelines for the purchase, lease or acquisition of online resources that ensure these resources are accessible.**

We recommend that University purchasing agents, in conjunction with the proposed Web Accessibility Coordinator, review significant web services and software purchases for accessibility implications.

# Report of the Student Services Subcommittee

## **Scope of Review**

The Subcommittee on Student Services reviewed the practice and process of providing accommodation services for qualified students with disabilities. Different from previous compliance reviews where only service units were involved, the 2005 ADA Compliance Review included collegiate units and departments, service units, and students. The units included in this review are:

### **Service Units**

- Admissions
- Athletics
- Division of Student Services
  - Vice President's Office of Student Services
  - Alumni Association
  - Office of Student Life
  - Recreational Services
  - Residence Services
  - Student Disability Services
  - Student Health Service
  - Support Service Programs
  - University Counseling Service
  - Women's Resource and Action Center
- Evaluation and Examination Services
- Pomerantz Career Center
- Registrar's Office
- Student Financial Aid

### **Academic Units**

- Center for Credit Programs
- College of Business
- College of Dentistry
- College of Education
- College of Engineering
- College of Law
- College of Liberal Arts and Sciences
- College of Medicine
- College of Nursing
- College of Pharmacy
- College of Public Health
- Graduate College
- Office of Study Abroad

### **History of Services Provided**

SDS was established in 1975, two years after the first major disability law, the Rehabilitation Act, took effect. The Office of Services for Handicapped, as SDS was formerly entitled, served students, faculty, and staff with mobility concerns. Removing physical barriers to campus access was the primary role of that office. As the number of students with disabilities grew on campus and the demographics changed, the Office of Services for Handicapped changed its name to the Office of Services for Persons with Disabilities in 1986 and expanded its services to meet the needs of a growing number of students with invisible disabilities, such as learning disabilities and traumatic brain injury. Academic accommodations, such as alternative testing arrangements, were included as a major component of its services. In 1993, the Office of Services for Persons with Disabilities was changed to the Office of Student Disability Services. In 1996, its services were broadened to include a coordinator's position to provide services for deaf and hard of hearing students.

### **Current Status of Services**

Services for students with disabilities are coordinated and provided by SDS. Students with disabilities frequently establish their first contacts with SDS prior to their enrollment, but may come at any time when their needs arise. Information about services and the process of requesting services is available through SDS websites and publications, as well as those of other units, such as EOD, College of Liberal Arts and Sciences, and Admissions. SDS routinely participates in college fairs and summer orientation sessions to inform prospective and incoming students about its services. Since the spring semester of 2005, SDS has established an on-call system during its regular office hours to respond to questions or consultations.

To request SDS services, students need to submit both a student information form and documentation that verifies their disabilities and needs. SDS staff members, following established guidelines, determine students' eligibility for services and identify the services students need. Students visit with their SDS advisors each semester to determine their accommodation needs for each registered course.

Instructors typically include in their syllabi information about the process for requesting disability accommodations, and make announcements in class in the beginning of the semester to remind students of services. Students are expected to take initiative to communicate with SDS and their instructors about their needs. A Student Academic Accommodation Request (SAAR) form is used as a means of communication among SDS, the student, and the course instructor. The three parties involved must agree that the identified accommodations are reasonable

and how these accommodations will be provided. SDS provides consultation, clarification, and support whenever needed.

SDS services typically fall into three areas: Deaf and Hard-of-Hearing Services (e.g., sign language interpreting), Alternative Media Services (e.g., Braille embossment and text-to-audio text conversion), and Alternative Exam Services (e.g., distraction-reduced testing room and extended testing time.) There are approximately 450 students actively receiving accommodations through SDS. The majority of them are undergraduates. The most common conditions are attention deficit disorders and learning disabilities (nearly 60%), followed by chronic health conditions, psychiatric conditions, orthopedics or mobility concerns, hearing, temporary conditions (e.g., bone fracture), and vision. Funding for disability accommodations comes from the Division of Student Services through internal reallocation of funds. Currently, SDS provides services only to students. The Office of Faculty and Staff Disability Services in Human Resources coordinates employment accommodations for UI faculty and staff with disabilities.

Many of the academic units utilize exclusively the services provided by SDS to determine students' eligibility for reasonable accommodations and the specific reasonable accommodations to be provided. A few of the colleges, including the Colleges of Law, Medicine and Dentistry, however, do not regularly utilize SDS and instead have developed their own procedures for reviewing requests and providing accommodations. These procedures vary from college to college: While the College of Medicine involves a committee of representatives from different constituencies to determine eligibility, the College of Law and College of Dentistry rely on their Associate Deans to facilitate services. Despite their differences, all of these colleges have made their policies and procedures known to their students, staff and faculty.

### **Legal Requirements**

Federal laws that protect the rights of individuals with disabilities include the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973. Section 504 of the Rehabilitation Act of 1973 and the ADA both are relevant to this review. Under Section 504 and the ADA, no qualified student, on the basis of disability, may be excluded from participating in or be denied the benefits of any program, activities, and services offered by the university. These programs, activities and services must be offered to all students in the most integrated setting feasible. The university has an obligation to provide reasonable accommodations to qualified students with disabilities. A "qualified person with a disability" is defined as one who meets the requisite academic and technical standards required for admission or participation in the postsecondary institutions programs and activities.

## **Review Process**

Subcommittee members were divided into three groups: Academic Units, Service Units, and Student Survey Groups. After receiving the subcommittee charges, group members met separately to identify the names of interviewees, develop a standard set of questions, and design the survey. For the Academic Units and Service Units Groups, an e-mail was sent to the appropriate administrator that included an invitation and interview questions, followed by a visit to the unit for the interview. For the Student Survey Group, members met during the winter break to develop survey questions. During the first three weeks of the semester, SDS registered students were surveyed and invited to participate in two forums to elaborate on their comments. These two forums were unfortunately not well attended: only one student and her spouse came. Their comments in general were complimentary.

## **Findings**

### *Service Units Review*

All interviewees stated a basic understanding of compliance requirements. However, the specific application was vague in some cases. Most identified the "Accessibility Statement" from the Equal Opportunity and Diversity (EOD) website as the primary method for informing students about requesting accommodations, and indicated that they would contact SDS or EOD as primary information sources for assistance and consultation. It was apparent that most interviewees were familiar with accommodating physical disabilities but less conversant about accommodating disabilities that are less obvious, such as learning disability or chronic health conditions.

Very few units had written procedures for providing accessibility. While some departments had not typically included discussion about disability accommodations in their regular training, many planned to add it to future agendas. Most of the units stated that there are "go to" people that all staff members know to contact as questions or issues arise in this area, and are aware of general guidelines concerning the handling of confidential information.

Many units provide resources as necessary through internal reallocation, and did not have a specific line item budget for accommodations. These include two units that regularly provide accommodations because of the public nature of their events.

Some websites meet the UI ITS accessibility standards, but most units stated they were in the process of updating their sites and would be certain to observe these standards during these upgrades. Not all units included information about access for students with disabilities on their websites. Those that did not stated

they planned to review their websites to make certain they provided this information to ensure that students with disabilities feel welcome.

A summary of the interviews and the standard questions used by the Service Units Group are listed in Appendices B and C, respectively.

### *Academic Units Review*

In general, colleges that utilize SDS for accommodation services appear to be satisfied with the expertise of and service provided by SDS. These colleges rely on the SDS staff to determine eligibility for accommodations and reasonable accommodations. The accommodations recommended by SDS typically are implemented without hesitation unless there is question about the appropriateness of an accommodation. In this case, SDS, EOD, or other offices responsible for assisting accommodations might be consulted.

In those colleges that do not regularly utilize SDS, the procedure for requesting accommodations is articulated through a written policy and is communicated to students through various channels, including course syllabi and the college web site. Individuals in those colleges responsible for disability accommodation are knowledgeable about the particular field and the nature of their student populations. This knowledge, considered crucial by these colleges, allows disability services to reflect the needs of their unique populations and academic and technical standards. However, there is the possibility of inconsistent practices and outcomes on a single campus where multiple policies and procedures coexist. For example, an undergraduate student in the College of Liberal Arts and Sciences may request and receive reasonable accommodation during the undergraduate program, then go into the College of Medicine and be denied any reasonable accommodation, or be granted different accommodations than were granted at the undergraduate level. This possibility for inconsistent results is concerning and may create a degree of risk for the University in terms of potential liability.

There is an apparent deficiency in the training or education provided to faculty and teaching assistants related to providing reasonable accommodations to students with disabilities. Although some colleges include such information as part of new faculty training each year, most colleges do not appear to have a systematic process for disseminating this important information to faculty. This lack of information may lead to unintentional errors during the process of providing accommodations, or to students not receiving reasonable accommodations when they are entitled to the same.

A summary of the interviews and the standard questions used by the Academic Units Group are listed in Appendices D and E, respectively.

## *Student Survey*

Among 191 students who visited SDS between January 17 and February 3, 2006, 70 students completed the survey, rendering a response rate of 36.6 percent. The distribution of disabilities represented by these 70 students resembles that of SDS registered students.

Seven areas were identified in the Student Survey to sample a broad range of activities and needs relevant to student life. These areas are: food and beverages services, athletic events, social and recreational activities, academic activities and accommodations, career preparation, health care, and on-campus housing. Students only needed to respond to the areas of services where disability accommodations were needed for them. In each area students were asked how important accommodations were to them, and, on a four-point scale (i.e., "Excellent", "Good", "Fair" and "Poor"), how positive their experiences had been.

Academic accommodations were above all the most common type of accommodations: Ninety-six percent of all surveyed students had some form of academic accommodations. Ninety-eight percent of them consider academic accommodations "Important" or "Very Important" to their success at UI. The majority of these students had positive experiences in making arrangement for academic accommodations with the faculty (86% rated "Good" or "Excellent") and through SDS (95% rated "Good" or "Excellent"), and felt the campus climate was supportive. Despite these positive experiences, some students pointed out the lack of disability awareness among the faculty and teaching assistants, and suggested that training be implemented on campus. In addition, some students expressed frustration in scheduling exams at SDS given the limited operation hours for exam services, and these students recommended an expansion of its current schedule.

This survey also raised issues concerning limited support to students' academic success: More than one third of the students who used academic accommodations reported that they had withdrawn from a course because of their disabilities, while 14% of them changed their majors because of their disabilities. These findings highlighted an unfulfilled need for academic and advising support for students with disabilities.

In the areas of health services, athletic events, social and recreational activities, and housing, students were generally positive about the access to restrooms, seating, or access to entrance/exits, clarity of direction/signage, air quality, and staff's willingness to help. As expected, most students required no accommodations in these specific areas of services. However, for those who had more concentrated needs, their responses were less likely to be satisfactory. Students with restricted mobility, for example, tended to rely on campus dining more than other students to meet their needs for food and beverages, and were

least satisfied with the cost of on-campus dining and with the accessibility to self-service dining and restrooms. Students with vision and hearing impairment recommended installing monitors to broadcast events simultaneously, and providing captioning for all on-campus movies.

Parking was of great concern primarily in the areas of health care and housing. Nineteen percent of the students who needed accommodations for health care services, and 59% of those who needed on-campus housing accommodations, said parking was "Poor." Again, these responses tended to come from students with concentrated needs, including students with mobility difficulty, health conditions, and vision difficulty. Few and distant handicap parking spaces around health service areas and housing facilities were mentioned.

Career preparation is one area of interest in this survey, although it is not an issue of ADA compliance but retention and advocacy. Twenty-nine percent of all students who completed the survey felt their disabilities had restricted their choice of major or career interest. Although only 51% of these students had discussed their disabilities with a faculty or staff member when considering their career choices, 73% of those who had not discussed their disabilities with a staff or faculty member indicated that they would be comfortable with such disclosure. Given the percentage of students whose career choices were affected by their disabilities and their openness to seek guidance, effort to promote career preparation for students with disabilities could be an area of attention in the future.

A summary of the survey results and the survey used by the Student Survey Group are listed in Appendices F and G respectively.

### **Subcommittee Recommendations**

1. We recommend that the University carefully review the various accommodation procedures in the colleges that do not utilize SDS, to determine whether there are any inconsistencies that could create legal risk for the University. Such a review could be coordinated by the University's ADA Coordinator.
2. We recommend that the University develop and implement a plan to provide training and/or information to faculty, teaching assistants, student employees, and staff relating to legal requirements, reasonable accommodations, and other disability-related topics. This plan could be developed through collaboration among EOD, SDS, and academic and service units.
3. We recommend that SDS evaluate the possibility of expanding exam service hours to better meet students' needs. An expansion of SDS exam services would significantly increase the quality of these services and their benefits to students.

4. Parking is a major concern for students with disabilities. Because parking and transportation is part of this 2005 ADA Compliance Review, we defer to that subcommittee to address this particular concern.

# Report of the Employment Subcommittee

## **Scope of Review**

The Employment Subcommittee, led by the Office of Faculty and Staff Disability Services, was charged to review employment obligations of Title I of the ADA and the University's reasonable accommodation process.

Title I encompasses a wide range of policies, services, and as well, reasonable accommodations relative to application and employment of people with disabilities. Therefore, this review included evaluation of policy, practice and disability awareness in the areas of: 1) recruitment (including recruitment advertising), application, and testing; 2) selection and hiring processes; 3) pay, compensation and benefits; 4) training and development; 5) evaluation; 6) promotion; 7) demotion; 8) discipline; 9) leave; 10) transfer; 11) layoff/recall, and termination; and 13) the reasonable accommodation process.

## **History of Services Provided**

A Reasonable Accommodation Specialist position was created in the fall of 1992 with responsibilities to provide guidance and assistance to the University in pursuit of reasonable accommodations for applicants and employees with disabilities when a disability (or disabilities) substantially limited an individual's participation in the application process or in the performance of essential functions of a job. The services of the position evolved beyond facilitating reasonable accommodations to also include providing education on disability awareness and providing guidance on employment matters involving all health conditions relative to maintaining work and/or returning to work. Service expansion continued and the Office of Faculty and Staff Disabilities Services (FSDS) was established when another part-time staff position was added in the late 1990's.

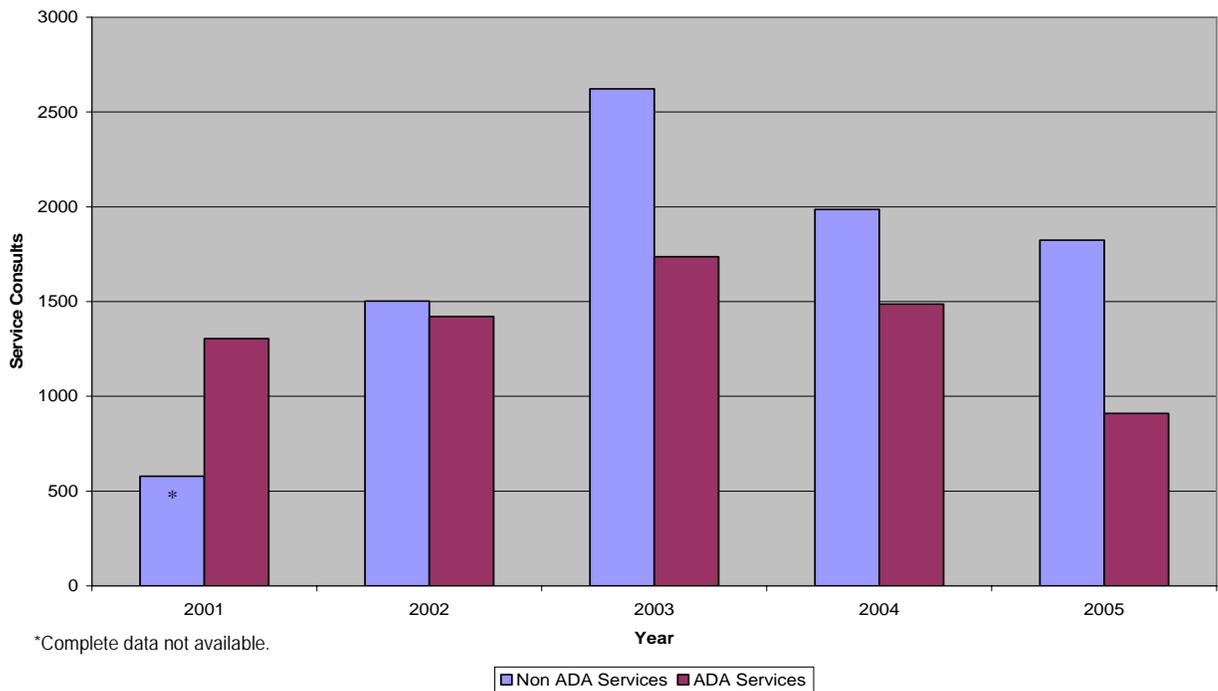
## **Current Status of Services**

FSDS is currently staffed with two full-time positions: one professional position, which has shared responsibilities as the director of Immigration Services and FSDS; and a clerk position. FSDS staff are responsible for interpreting legal requirements and setting and interpreting policy on all matters involving employment and health conditions. FSDS staff provide guidance, direction and assistance to administrators, supervisors and employees concerning employee occupational and non-occupational leave management and return to work, including FMLA; performance management; and the implementation of the employment requirements of the ADA, including the reasonable accommodation process. FSDS staff work closely with staff in Human Resource units, the Office of Equal Opportunity and Diversity, and the Office of the General Counsel in implementation of their responsibilities.

The scope of the services for which FSDS is responsible is divided into *education, resource and information, informal department manager/employee consults, and formal client cases*. Multiple education sessions and forums are provided to University departments on disability and employment-related topics.

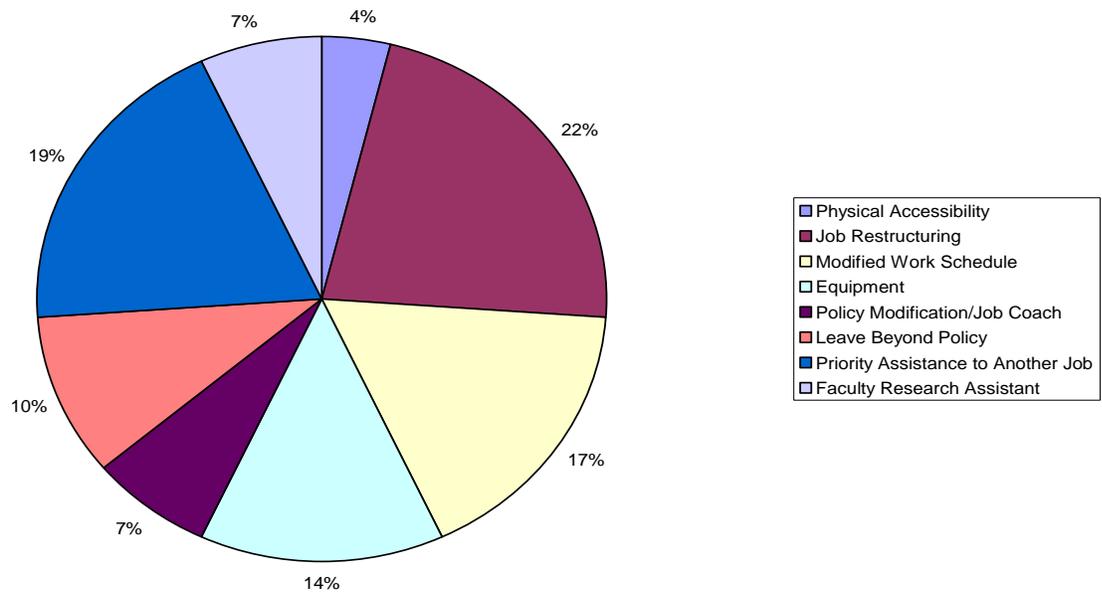
The development of the Human Resource Unit Representative functions have allowed FSDS services to move from providing primary case management coordination to providing a central resource and informational location for colleges, departments and public individuals seeking general ADA information related to provision of public events, public accommodations, etc. However, cases at a higher level of complexity typically are referred to FSDS for guidance and direct service management. Informal consults are of short-term duration and include guidance and direction to managers and employees relating to specific questions in the areas for which the office has responsibility. A formal client case involves an employee seeking assistance beyond that which is immediately available in the employing department, related to his/her health and work abilities and typically involves seeking information regarding accommodation.

University policy directs that the reasonable accommodation process should be provided through the FSDS office. This policy is designed to assure University compliance with legal requirements. Formal FSDS client cases typically involve an individual's need for some type of employment accommodation. Although the aggregate services influence thousands of employees annually, formal client cases and services are a small percentage of the full service provision. Service trends are shown below.



Formal client case services are consultative specific within a broad range of employment related options and a small percentage of these clients seek accommodation services. The accommodation process is then implemented to achieve reasonable accommodations where feasible. Reasonable accommodations are those that do not create an undue financial burden for the University or ultimately change the purpose of the position or structure of the work in the department. The reasonable accommodation process requires the coordination of relevant medical documentation and job information along with a complex mixture of education, awareness-building, and mediation and facilitation with the employing department, employee and (in many cases) employee advocate, with the goal of developing a reasonable accommodation that removes barriers so that the employee has an effective opportunity to achieve employment expectations. The selected accommodation may be different from the accommodation requested by the employee, as long as it is effective. Accommodations are denied when an individual is determined to not qualify as a person with a disability as defined by Title I or when a reasonable accommodation is not feasible in a specific job. In the latter situation, the individual receives reasonable accommodation in the form of priority referral assistance to apply for other vacant University positions for which the individual is qualified.

### Reasonable Accommodations Provided Between 2001-2005.



## **Review Process**

The objective of this review was to determine the University's compliance with legal obligations and also evaluate campus awareness related to disabilities and the ADA. The evaluation strategy included a three-pronged approach that addressed written policy compliance, policy and procedure implementation, and evaluative observations of people with disabilities who received reasonable accommodation(s) within the recent five years.

The three-pronged strategy was achieved by three separate groups of individuals. Written policy compliance was evaluated by administrators representing seven units in Central Human Resources with applicable service responsibilities and the Office of Equal Opportunity and Diversity. See attached survey, Appendix H. The group focused on policy content relative to equal access in recruitment, application and testing; hiring and selection; compensation and benefits; training and development; evaluation; promotion; demotion; discipline; leave; transfer; layoff, recall and termination; and reasonable accommodation.

To obtain the most accurate and complete evaluations, identification of respondents participating in the second and third sections of the review was structured to remain confidential and anonymous to survey data collectors. The second prong of the evaluation was conducted in seven colleges and divisions that had provided reasonable accommodations within the last five years. Human Resource Unit Representatives distributed surveys to sixty-one (61) randomly-selected college, division, and department managers, supervisors, and human resource generalists with direct experience in working with employees with disabilities in the reasonable accommodation process. See attached survey, Appendix I. The survey evaluated respondent knowledge, feelings and concerns with the accommodation process and outcomes. One hundred percent of all surveys were completed and returned.

The third prong of the evaluation was a survey of randomly-selected current and former University employees with disabilities who had received reasonable accommodation within the last five years. See attached survey, Appendix J. Respondents were asked to identify their level of awareness of accommodation opportunities for people with disabilities prior to seeking accommodations, and their feelings regarding the process effectiveness and efficiency. Fifty surveys were mailed and twenty-two responses were received for a forty-four percent response rate.

Participants of the first and second groups were provided with copies of Title I of the Americans with Disabilities Act of 1990 (Pub. L. 101-336) (ADA), as amended, as it appears in 42 U.S.C. Section 12101, and a Question and Answer discussion of the ADA from the U.S. Equal Employment Opportunity Commission (EEOC) for better understanding of requirements. These two groups also provided comments regarding the survey tools used in each of the three surveys.

## **Legal Requirements**

The University follows applicable federal and state requirements in the development of employment policy, specifically the Iowa Code, Title I of the ADA, and Section 503 of the Rehabilitation Act of 1973. These requirements prohibit employment discrimination against people with disabilities. The ADA further addresses the elimination of employment barriers through the provision of reasonable accommodation. Disability is defined as “a mental or physical impairment that substantially limits one or more major life activities.” Examples of major life activities include walking, eating, speaking, sleeping, breathing, hearing, seeing, self care, learning, manual tasks, and working. The ADA also protects people who are perceived or regarded as having disabilities, and those with a record of a disability, from discrimination in employment. Court decisions apply and interpret the ADA (e.g., court decisions determined after the Act’s enactment that learning, sleeping and manual tasks are to be included in the list of major life activities). The goals of the ADA include addressing society’s negative attitude and sentiment towards people with disabilities and thus, the Act encourages education in the pursuit of modifying attitudes and increasing understanding.

The University of Iowa Disability Protection Policy is believed to be consistent with federal and state requirements relating to employment discrimination and reasonable accommodation.

1. “The University of Iowa, as authorized by Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans Readjustment Assistance Act of 1974, shall take affirmative steps to employ and advance the employment of qualified individuals with disabilities and qualified disabled veterans and veterans of the Vietnam era at all levels of employment. The affirmative action policy applies to, but is not limited to, the following employment practices: (1) Hiring; (2) Upgrading; (3) Demotion; (4) Transfer; (5) Recruitment; (6) Recruitment advertising; (7) Layoff; (8) Termination; (9) Rates of pay/other forms of compensation; and (10) Selection for training (including apprenticeship).
2. The University of Iowa endeavors to make reasonable accommodations for the functional limitations of applicants, employees, and students with disabilities and disabled veterans pursuant to applicable federal and state law. Applicants and employees with disabilities seeking accommodations should contact Faculty and Staff Disability Services ([www.uiowa.edu/hr/fsds](http://www.uiowa.edu/hr/fsds)).

## **Findings**

### *Written Policy*

The policy review group report demonstrates that the University policy assures equal employment rights to people with disabilities and opportunities for reasonable accommodation in all evaluated areas (recruitment, application and testing; hiring and selection; compensation and benefits; training and development; evaluation; promotion, demotion; discipline; leave; transfer; layoff, recall and termination; and reasonable accommodation). Additionally, the University reasonable accommodation processes and practices are consistent with EEOC guidelines that require an individualized review of each accommodation request and modification of such request. The University also aligns its process with EEOC guidelines to encourage interaction and participation of involved individuals in the accommodation process.

### *Policy and Procedure Implementation*

The survey of managers, supervisors, and human resource generalists reveals department and management concerns, department support of employees with disabilities, and perceived procedural weaknesses. The majority of the respondents consistently indicated the following:

#### *Department and Management Concerns:*

- The University does not financially support departments in providing accommodation.
- Employees may not be able to perform the work with accommodations.
- Assurance that employee and employer rights are protected (specific to confidentiality and getting work done).
- General concerns about the feasibility of accommodation when an employee identifies a need for accommodation.

#### *Department Strengths:*

- Departments are supportive of employees with disabilities and sensitive to their employment needs.
- Management feelings about the accommodation process are neutral to positive.

#### *Process Weaknesses:*

- Most accommodations are provided directly by departments independently of the University's accommodation policy which requires departments to work with FSDS to implement the accommodation process. This is perceived by some as an advantage, but by others as a weakness because of the perception of inconsistency between departments.
- The majority of responses indicate misunderstanding and lack of knowledge regarding the purpose and scope of the accommodation process, e.g., job expectations are reduced for people with disabilities, confusion between short-term restricted work assignments, FMLA and ADA accommodations.

### *Observations of People Receiving Accommodation*

Respondents were requested to answer eight questions and invited to share comments. Fifty-five percent indicate awareness of the University accommodation policy and procedure prior to expressing a need for employment assistance; however, forty-five percent were not aware of the policy. Fifty-nine percent indicate awareness that employment events they attend must be accessible to them; however, thirty-six percent were not aware of this requirement. Eighty-two percent indicate that the provided accommodations have been helpful in the performance of their work. Forty-one percent are positive and thirty-six percent are neutral on how the process was conducted. Sixty-four percent felt the accommodation response was timely and twenty-three percent believed the process to be cumbersome. Fifty-nine percent had met with their supervisor from occasionally to frequently to review the status of the accommodation. However, twenty-seven percent indicate there had been no follow up to the accommodation. Eighty-two percent would first seek assistance from their supervisor when accommodation needs arose. Seventy-seven percent believe co-workers are somewhat to completely supportive of their receiving accommodations and twenty-three percent indicate co-workers were not supportive.

Respondent comments indicate perceived inconsistency in the implementation of the accommodation process. The reasonable accommodation process permits departments to provide accommodation for known disabilities that have a substantial impact on an employee's ability to perform work functions. The reasonable accommodation thus reduces the barriers or issues presented by the condition, leaving the employee with an opportunity to pursue achievement of work expectations. The University practice is to implement the accommodation process in lieu of discipline when the performance is attributable to a known disability. What we understand from employees is that those who are not knowledgeable of the accommodation process do not seek accommodation and often find themselves involved in the discipline process or seeking other employment for failure to meet job expectations, whereas employees connected with appropriate resources find solutions to their work issues and either receive accommodations in their jobs or accommodations to find alternative work.

### *Summary*

Written policy is aligned with federal and state requirements; however, knowledge of policy and procedure is limited to employees connected with applicable resources. University managers are sensitive and seek to be supportive of employee needs; however, managers are inconsistent in the application of the accommodation policy and process. This inconsistency increases the occurrence of the issues mentioned in the management concerns. When managers implement accommodations for employees without use of FSDS resources, there is increased risk that individuals will be perceived or regarded as disabled, that reasonable accommodations may not

be documented, that jobs may be stripped of essential functions without warrant, and that accommodations may be denied inappropriately.

Accommodation practices are intermingled with non-ADA employment policy and procedures (e.g., Family Medical Leave, Workers' Compensation and return to work efforts) which increases employee and manager confusion. The Family and Medical Leave ACT (FMLA) appears to have overshadowed the ADA as it has evolved, and it has reduced some of the emphasis on the ADA. Many employees previously requesting accommodation now request FMLA absences from work. With this emphasis on leave, we have the additional issue of the FMLA not allowing employers to communicate with health practitioners in the process of pursuing employment solutions pertaining to health conditions, whereas the ADA encourages this interaction.

### **Employment Subcommittee Recommendations**

Based on the responses and findings, we recommend that the University take the following actions:

1. Fully implement the policy mandate that all ADA accommodations are processed through and coordinated by FSDS, provided that resources could be allocated to support additional FSDS staffing.
2. Implement follow-up evaluations with employees receiving reasonable accommodations to assess the effectiveness of and satisfaction with the accommodations provided.
3. Provide additional staffing in FSDS for the following basic service needs:
  - A. Expand education efforts to further manager and employee knowledge of policy, procedure, disability awareness and the interplay of the ADA and FMLA.
  - B. Analyze the cost and benefits of establishing a central fund to financially support ADA employment accommodations across campus.
  - C. Continue case law research and monitoring to remain apprised of compliance requirements.
  - D. Develop a cross-functional campus group to assist in the continuing review and actions necessary to:
    - 1) Establish the purpose and content of communication with co-workers to address confidentiality, disability awareness, and the accommodation process, and
    - 2) Address process roles specific to case management activities and communication performed by managers, Human Resource and FSDS staff.
4. Increase the visibility of disability in University employment life and communications. Recommended action steps include:

- A. include people with disabilities on the UI Home page,
- B. include a statement about disabilities and link the HR web pages to the disability web site,
- C. include a story in UI People that highlights a person with a disability,
- D. include a welcome message and information about requesting accommodation on the Career Development web site,
- E. link the UI Home page to a disability web site,
- F. use additional written communications and expand the FSDS web page to include stories about people with disabilities, and
- G. include information about requesting accommodation in the email notice sent to applicants confirming application receipt.

# Report of the Parking and Transportation Subcommittee

## **Introduction**

A general observation is that the ADA has moved on to a more mature phase in which the University is dealing with constituents who have grown up with the guidelines, are more mobile, and are seeking a more sophisticated level of access than in previous years.

The University of Iowa Department of Parking and Transportation includes three units: Cambus, Parking, and Fleet Services. Each unit has been active in promoting campus accessibility since before passage of the Americans with Disabilities Act in 1990. Efforts to improve campus accessibility by the parking system and Cambus have been detailed previously in the 1993 and 1998 University accessibility reports. Fleet Services was administratively assigned to Parking and Transportation in FY 98 and had not been covered in those reports.

The ADA guidelines that govern Cambus and Parking are overseen by different bodies, and are applied quite different in daily operations. In this report they are addressed in separate sections as they have been in previous reports.

## **Scope of Review**

The Parking and Transportation Subcommittee was charged with reviewing the University's compliance with the requirements of the ADA as they apply to transit and parking operations. Transit was reviewed according to ADA guidelines issued by the Federal Transit Administration's Office of Civil Rights, while parking was reviewed according to its compliance with ADAAG (Americans with Disabilities Act Accessibility Guidelines), particularly the sections on parking.

In addition to compliance with minimum standards, the review considered capacity issues brought forth by various members of the University community. Finally, technical issues were considered including communications and accessibility to information.

## **Review Process**

The 2006 review of on-campus accessibility invited a significant level of public comment through two scheduled forums, responses to public announcements of the review and from information gathered by the Task Force's multiple subcommittees. Parking and Transportation also drew input directly from its active clients and from representatives of units that have regular involvement

with accessibility issues. Much of this report drew upon extensive participation from various Parking and Transportation staff who work closely with persons with disabilities and ADA issues.

## **CAMBUS**

### **History of Services Provided**

Cambus, the University's public transit fleet, provides accessible fixed route and Para-transit (Bionic Bus) services under federal guidelines managed through the Federal Transit Administration's (FTA) Office of Civil Rights. Compliance is certified by the Johnson County Council of Governments (JCCOG) and is audited by the FTA every three years. Design of bus stops, transportation facilities, signage and other facility related items are covered under ADAAG.

Cambus began providing Para-transit services to University faculty, staff, and students with disabilities in 1976 through the operation of a single small lift-equipped bus, named the Bionic Bus by its riders. The Bionic Bus was a successor to an all volunteer service that operated a station-wagon on campus for a year or two prior to 1976. The Bionic Bus was instituted in response to rules promulgated by the Urban Mass Transit Administration (UMTA- the predecessor to the FTA) in response to Section 504 of the Rehabilitation Act of 1973. These rules required transit systems that receive federal funding, to provide either accessible fixed route or, "complementary para-transit" services, and to spend 10% of their annual budgets on these services. Cambus qualified for its first federal funding for bus purchases in 1976 and immediately began providing the services.

With the passage of the ADA in 1990, Cambus was required to provide "specialized" transit services (door-to-door lift equipped small bus services) to persons with disabilities who lived within three-quarters of a mile of fixed-route transit lines. Another significant component of ADA was the requirement that all new transit buses, acquired with federal funds, be equipped with lifts or ramps. The Bionic Bus was designated as the specialized provider for Cambus and was operated throughout the Iowa City/Coralville metro area. SEATS, Johnson County's transit system which also operated a fleet of small, lift equipped buses, provided the specialized transit services for Iowa City and Coralville transit systems on a contractual basis. These specialized services were the only form of accessible public transportation on campus until 1997 when Cambus acquired its first five lift-equipped fixed-route transit buses. The fixed route fleet became fully accessible in 1998 when the remaining buses were retrofitted with lifts.

### **Current Status of Services**

Today, Cambus operates a fleet of thirty-two buses, all either lift or ramp equipped. Bionic operations have grown from a single bus operated only during

daytime hours to three peak-hour buses operating on weekdays with extensive weekend service. Since FY 99, the first full year of accessible fixed route service, annual lift-assisted ridership on Cambus fixed route service has ranged from a high of 961 rides in FY 2000 to low of 729 in FY 2002. Ridership on the Bionic Bus during that same time ranged from a high of 11,312 in FY 04 to a low of 8,881 rides in FY 2000. In FY 05 the Bionic Bus provided 11,097 rides to persons with disabilities, while another 730 rode Cambus fixed route service. Total Cambus ridership in FY 2005 was 3,583,116.

Iowa City and Coralville Transit fixed route fleets are also fully accessible. Both Iowa City Transit and Coralville Transit contract with SEATS (Johnson County) for their specialized transit services. In FY 05 SEATS provided 71,694 (61,418 for Iowa City and 10,276 for Coralville) rides for the Iowa City and Coralville transit systems to persons with disabilities while Iowa City and Coralville Transit provided 5,442 and 1,446 lift assisted rides respectively on their fixed routes buses.

### **Legal Requirements**

Under current FTA guidelines, Cambus is required to ensure that all fixed-route services are accessible through the use of lifts or ramps on the buses. In addition to accessible fixed-route service, Cambus is required to provide specialized transit services to qualified individuals with disabilities who live along its fixed route service lines. Given the concentration and overlap of Cambus fixed route service on the main campus, this regulation generally translates into a requirement to provide specialized transit services within three-quarters of mile of the main campus boundaries. In practice, Cambus has so far continued to provide specialized transit services throughout the entire Iowa City/Coralville metro area despite a fixed route service that is focused on the main and Oakdale campuses.

To qualify for the specialized transit services, an individual must complete an application and request the service from the Transit Manager. The same procedure is used when applying for specialized services associated with Iowa City and Coralville Transit operations.

Accessible public transit also means that fixed route bus stops are announced by drivers as an aid to blind persons; that transit accommodates the presence of service animals on board; and that a viable means of communication exists between Cambus/Bionic schedulers and riders that effectively accommodates persons with sight, hearing, or speech impairments. In earlier years Cambus used TDD's (Telephone Device for the Deaf) but they have fallen out of favor. More recently e-mail has fulfilled the communication needs of most riders, with the telephone still used regularly. Electronic readers translate e-mail messages into audio to aid persons with diminished vision.

Fixed route patrons rely heavily upon the Cambus website for route and schedule information. The website is written in an accessible format to accommodate inquiries from persons with vision impairments. Special communication requirements are also occasionally conveyed by the Office of Equal Opportunity and Diversity.

### **Findings and Recommendations**

This year's review found fewer comments about compliance, but more that were focused on capacity, policy or technical issues. Very few concerns were directly raised by clients about the operation of either the Bionic Bus or Cambus fixed route services. Of the concerns raised, most were focused upon the difficulties involved in reaching points of access to transportation services. They usually dealt with blockages to sidewalks by snow, parked vehicles, or construction projects. The following challenges were derived from interactions with Bionic and fixed-route clients, and from discussions with Cambus staff.

- 1. Cambus Fleet:** The installation of lifts onto buses revolutionized public transit for persons with disabilities, but over the years the numerous mechanical failures of lifts have proven to be liabilities to transit operations. Given their relatively complex hydraulic/mechanical systems and their method of mounting under the bus frames and near wheel wells, they are subject to extensive exposure to temperature extremes, corrosive road salts, accident damage and general wear and tear. Lift failures are one of the most common mechanical problems to disable a bus in service, and a lift failure can leave a disabled rider stranded in an awkward and unprotected position. By one estimate, Cambus had to increase the number of maintenance technicians from 2.5 to 3.5 just to maintain the lifts on its thirty-two buses.

As wheel chair design has changed, lifts have had to change with them. The Bionic Bus has struggled to keep up with increasingly larger or heavier chairs over time. It has not been uncommon to have to send out a different Bionic Bus to accommodate a new oversized chair that would not fit on an existing lift.

When Cambus purchased its first Orion II small bus in 1999 it gained the opportunity to experiment with a low floor bus that replaced lifts with ramps. The ramps have proven significantly more reliable in operation and provide the riders with an improved measure of dignity. Most riders prefer the ramps. Unfortunately, Orion has since gone out of business, but other low floor buses remain available.

**Recommendation:** When funding is available, Cambus should replace its current lift-equipped fleet with low floor, ramp-equipped buses.

- 2. Service Area:** Historically Cambus has operated the Bionic Bus throughout the entire Iowa City/Coralville metro area. This practice evolved out of the lack of an alternative to the Bionic Bus for University staff, students and faculty in the early days of service. Over time, the practice was retained because UI riders much preferred the operating policies (and equipment) of the Bionic Bus to those of SEATS. Today, this practice severely restricts the capacity of the Bionic Bus by spreading its fleet and financial resources across too large a service area; one ride from Scott Boulevard to the Coral Ridge Mall and back can take over an hour, tying up one bus continuously. This level of service is not required by ADA and could be provided by SEATS.

**Recommendation:** Assemble a committee involving active Bionic riders to review the effects of focusing the service area of the Bionic Bus (specialized service) into the main campus and its immediate surroundings to improve on-campus service levels.

- 3. Coordination:** The quality of community-wide transportation is dependent upon the quality of each of the various components (Cambus, Iowa City Transit, Coralville Transit and SEATS) and the coordination among them. Coordination among the fixed route services is fairly good, however there is limited coordination of the specialized services (Bionic Bus and SEATS), other than differentiating between riders based upon University affiliation.

**Recommendation:** Work through JCCOG to maintain and improve coordination among local transit providers, with a focus on improving the coordination between the specialized services.

## **PARKING**

### **History of Services Provided**

The University Parking and Transportation Department currently manages 14,600 parking spaces with 335 spaces designed and constructed to meet ADA standards, compared to 10,000 spaces when the first ADA review was drafted in 1993. University Parking does not administer parking at the Oakdale Campus, the Mossman Building, the softball/track complex, or at the Hawkeye Court, Hawkeye Drive, or Parklawn Residence Halls.

Beginning in 1991, the University Parking system began moving towards compliance with the Americans with Disabilities Act through alterations to existing parking facilities and by designing all new facilities to meet ADA guidelines as expressed under ADAAG (Americans with Disabilities Act Accessibility Guidelines). ADAAG was originally published in July 1991. The most recent update as it applies to parking was published in September 2002.

## **Current Status of Services**

Today, the parking system meets ADA requirements in terms of the number of specially dimensioned parking spaces, their location and accessible pathways.

## **Legal Requirements**

ADAAG addresses parking issues for persons with disabilities by establishing design guidelines for the size, number, signage, location, and clearances of parking spaces; and by setting standards for accessible routes including doors, ramps, clearances and elevators.

There are a range of ADA guidelines for parking as outlined under ADAAG; however, two of these guidelines, concerning the dimensions of individual parking spaces and the quantities of these spaces within a facility, represent the principle challenges when attempting to meet standards. In addition, there is an expectation that the University make reasonable accommodations in order to provide parking to persons with disabilities on a case by case basis when special situations arise.

### *Dimensions*

Accessible parking spaces at the University of Iowa exceed the minimum dimensions required under ADA. While the guidelines call for spaces with a width of eight feet, the University utilizes eight and one-half feet. And, while the required width of an accessible walkway between ADA spaces is either five or eight feet depending upon whether the spaces are designated as standard or van-accessible, the University of Iowa utilizes eight and one-half feet of width in most of its parking walkways. Since the width of nearly all standard (non-accessible) parking spaces within the University of Iowa parking system is also eight and one-half feet, this allows for easy expansion of ADA capacity within an existing facility. It results in a two for three exchange; two ADA spaces and one van-accessible walkway are gained in exchange for giving up three standard parking spaces.

In structures there is also a requirement that there be ninety-eight inches of height clearance where there are van-accessible ADA spaces.

### *Capacities*

The minimum number of required ADA spaces is dependent upon the intended use of the parking facility. In most facilities of 100 or fewer spaces, approximately 4% of the total capacity is expected to be in the form of ADA spaces. The total requirement diminishes according to a scale as the lot grows in size, but generally 2% of larger facilities' capacity is required to meet ADA standards. In facilities serving outpatients, the requirement is 10%, and in facilities serving

medical services that specialize in treating persons with mobility impairments, the requirement is 20% of total capacity.

At the University of Iowa, the number of ADA spaces installed within a facility are prorated based on designated use. For example, within the 525 space Melrose Avenue Parking Facility, two separate uses are intermingled; Lot 90, a 235 space facility assigned to employees and Hospital Ramp 4, a 290 space cashiered patient facility. According to ADA requirements, Lot 90 would require seven ADA spaces, while the Hospital Ramp 4 portion would need to meet the 10% goal of twenty-nine. Currently there are a total of forty-one ADA spaces within this facility.

In a large integrated parking system like the University's the minimum requirements for each facility can only serve as guidelines. Demand often exceeds local capacity or fails to materialize at all. An example of the former case would be the parking facilities serving the Hospital where demand for ADA parking currently exceeds inventory. Valet parking for persons with disabilities (operated by the UIHC) helps alleviate some of that demand, but periodic shortages still persist. Parking operates several large peripheral commuter parking facilities where more than sufficient ADA spaces are provided, along with accessible transit service, but these spaces remain underutilized. In contrast, twenty-five facilities (employee lots) have no ADA spaces at all and there have never been any requests for them. This absence of accessible spaces in some lots is made up for by an abundance of capacity in others. The net effect is an overall compliance with the requirements of the ADA, but periodic spot shortages that require adjustments to meet the shifting demand.

One of the most important factors used to determine whether the quantity of ADA spaces within an employee facility is sufficient is whether or not demand is being met. In employee parking facilities that measure of demand is complicated by the fact that the majority of University employees who request an accessible parking assignment have expressed a desire not to utilize an ADA space. Their first priority is to gain admittance to a parking facility proximate to their work site. They may not need the larger dimensioned ADA spaces and many have even expressed reticence in using them. Parking has addressed this preference by offering assignments for employees with disabilities, into non-ADA spaces.

### **Concerns raised by Participants during the review**

The following issues were raised during interviews or discussions with clients, the public and with Parking and Transportation staff. Other concerns were raised through the use of e-mail, one of the two ADA forums held during the review, or from information gathered by one of the other subcommittees involved in this review.

1. Employees with disabilities have cited the length of time it takes to receive a parking assignment to one of the Hospital Ramps. The Hospital Ramps generally offer the closest ADA parking for UIHC employees, but are also the focus of ADA parking for patients and visitors. The general practice of serving patient parking first in an environment of limited parking capacity, has led to long delays in making ADA assignments to employees.
2. Students with disabilities have cited the procedural difficulties of obtaining a parking assignment to either an employee or public parking facility.
3. The North Campus parking Ramp and the IMU parking ramp both have only one elevator. When one of these elevators fails, it makes it nearly impossible for a person with a disability to use the ramp. Additionally, these parking structures are built into hillsides leading to use of the elevators by individuals who wish to scale the hill, but who are not using the parking facility. Users of the elevators have cited the need for an improved method of communication to both parking patrons and others, through which notice of the failed elevator can be announced prior to patrons either entering the ramps to park, or prior to patrons committing to a pedestrian path toward the ramp that might leave them stranded.
4. Demand for ADA parking by patients and visitors in the Hospital Ramps exceeds current capacity, leading individuals to park on levels with no ADA parking. These levels have not all yet been fitted with automatic door openers. The lack of openers on several levels has been cited as an impediment to an accessible pathway.
5. Snow and ice accumulations on sidewalks in and around parking facilities, after winter storms, has been cited as an impediment to the mobility of persons with disabilities or as being dangerous to all pedestrians. The perception among some was that snow removal and deicing efforts were insufficient in certain areas.
6. Vehicles operated by private and University service staff have been cited for blocking accessible pathways. Individuals in the ADA forums specifically mentioned Non-University vehicles, but Parking and Transportation staff also noted University of Iowa vehicles have been ticketed for parking on sidewalks or blocking other accessible routes.
7. Employees who are slated to move into the newly acquired Old Capitol Centre have cited the need for accessible parking around that facility.
8. Employees have cited the presence of vehicles with no approved ADA authorization, parked in ADA spaces. They have indicated that parking enforcement of certain areas in the Hospital Parking Ramps needed to be stepped up.

9. Several employees cited the need for an overhead or underground accessible path to connect the Newton Road Parking Ramp with the College of Medicine campus.
10. A concern was expressed that some drivers operating public transit vehicles in the community do not allow service dogs on board. Although drivers usually allow dogs trained to lead blind persons on board buses, drivers may not grant the same access to service dogs which have different skills to serve persons with other types of disabilities.
11. In recent years the Department has heard complaints about ADA parking capacity in and around special events, particularly athletic events and or concerts held at Carver Hawkeye Arena.

### **Findings and Recommendations**

1. Improving access to the Health Sciences Campus for patients, staff and students with disabilities can be improved partly by expanding the number of ADA spaces within Hospital Ramps 1, 2 and 4. Currently the facilities operate near to capacity (for all spaces combined) and an expansion of ADA spaces, at this time, would exacerbate the problem by reducing overall parking capacity. Construction on the MAPF (Melrose Avenue Parking Facility) Expansion project, which includes an expansion of Hospital Ramp 4, is expected to be completed by September 1, 2006. This will allow for a sizable increase in ADA spaces in both HR 2 and HR4.

**Recommendation:** When the MAPF expansion opens, convert twenty-seven (27) standard parking spaces on the east side of Level 4 in HR2 into seventeen (17) ADA spaces., bringing the total number of ADA spaces within HR2 to seventy-five (75).

In addition, convert twenty-eight (28) standard parking spaces on the west side of Level 4 in HR4 into seventeen (17) ADA spaces, bringing the total number of ADA spaces within HR4 to fifty-eight (58).

2. The dissatisfaction employees, and some students, expressed with delays associated with ADA parking assignments can be improved by altering the current assignment policies used to make those assignments. A key factor would be to establish targets for the minimum number of ADA assignments (not spaces) within each employee or student facility.

**Recommendation:** Work with the Offices of Student Disability Services and Faculty/Staff Disability Services to rewrite the ADA parking assignment policy for employees and students by July 1, 2006.

4. Some members of the community have asked for increased enforcement of illegal parking within ADA spaces. Enforcement cannot capture every illegally parked vehicle under any circumstance, but an increased focus this year has already brought a higher rate of enforcement. The total number of A2 violations (\$100 fine for parking in a handicap parking space) is up this year as follows, with most of the increase occurring within the Hospital Ramps.

Year	March 31	Year End
FY 03	115	150
FY 04	110	143
FY 05	116	147
<b>FY 06</b>	<b>191</b>	----

**Recommendation:** Continue to focus on enforcement of ADA spaces and encourage reporting of violations to Parking Field Services Officers by members of the public and the University community.

4. Parked vehicles blocking accessible pathways were cited as a recurring challenge on campus. Those raising the issue felt that better parking enforcement could address this problem. Parking enforcement is not able to correct all these infractions and, as a rule, parking enforcement does not even patrol sidewalks on a routine basis. In practice many of the blockages are brief, and on occasion, even necessary, but improvement may be made through an awareness campaign directed at operators of service vehicles, by increasing the no-parking enforcement of pedestrian areas and, by increasing the level of the fine.

**Recommendation:** Work jointly with Student Disability Services, Faculty/Staff Disability Services, Facilities Management and other service units who need vehicular access to pedestrian ways to ascertain where and when these instances occur and how they might be prevented or discouraged. Raise awareness of the impact of such a blockage.

5. The North Campus parking ramp (four levels) and the IMU Parking Ramp (seven levels) are each served by only one elevator. When they malfunction it creates an extreme level of inconvenience for persons with disabilities who rely on these elevators to negotiate the hill on the east campus. It is not practical to install an additional elevator in either of these structures, but improving the system of notification when an elevator is closed to parking patrons and/or pedestrians would allow them to choose a different parking facility or a different pedestrian pathway.

**Recommendation:** Install an electronic sign package that will allow Parking to provide a timely forewarning to the public when an elevator in one of these two ramps is closed.

6. In one forum a concern was expressed about the ability to take service animals on public transit vehicles. Current policy at Cambus, Iowa City and Coralville Transit systems is that service animals are allowed, but drivers are also allowed to inquire as to the type and function of a boarding animal and then screen if necessary. Animals that are simply pets are not generally allowed on public transit vehicles.

**Recommendation:** Raise awareness of the existence and functions of service animals, and of the policy supporting their use, by continuing to train drivers on the importance of service animals and by informing riders of the driver's role in screening boarders.

7. A persistent challenge is ensuring that accessible pathways are not obstructed by snow or ice during the winter. At times the issue for snow removal crews is which pathway to clear first since not every walk can be cleared at the same time. At other times, the problems are associated with a walkway that has been previously cleared by crews, becoming blocked again when snow is pushed and piled up onto it by the clearing of an adjacent street, parking lot or walkway. There is no perfect solution, but an active group that involves those who are responsible for the clearing activity along with those who require access to the accessible routes might provide some insight on how to proceed.

**Recommendation:** Form a working group with members from Student Disability Services, Faculty/Staff Disability services, Facilities Management, UIHC grounds and Parking and Transportation. This group would review current practices and provide input to operations crews during the snow season.

8. A number of doorways within parking ramps that provide access to lobbies or walkways do not have automatic openers. These doorways have been on levels where no ADA parking was installed, but the increased use of standard parking spaces on all levels of parking ramps by persons with disabilities has led to an increased call for their installation.

**Recommendation:** Install automatic door openers in all public access doorways that are part of University parking structures, by the end of FY 07. Approximate cost of project is \$75,000.

9. Employees who are being reassigned to work space within the newly acquired University Capitol Centre are concerned about the potential shortage of accessible parking to serve the building. The parking ramp adjacent to the structure (Old Capitol Parking Ramp) is owned and operated by the City of Iowa City to support parking needs for the entire Central Business District. The University has obtained access to a handful of parking assignments within the Old Capitol Parking Ramp, but not enough to meet

expected demand for ADA access. The City has agreed to work with the University on utilizing some of the on-street parking along Capitol Street adjacent to the University Capitol Centre as ADA space.

**Recommendation:** Finalize plans with the City to increase the number of ADA spaces adjacent to the Centre. As permits become available for use within the Old Capitol Ramp, increase the number allocated for assignments to persons with disabilities.

10. The lack of an above-grade, or below-grade, pedestrian crossing from the Newton Road Parking Ramp to the College of Medicine's campus was cited by several individuals. The below grade option was ruled out during design of the facility due to the cost and the large concentration of utilities under Newton Road. The above grade crossing was also ruled out partly due to the cost, but also due to the challenges associated with intersecting with MEBRF. There are no current plans to design or construct an elevated crossing. Instead, the University has spent considerable time and money improving the at-grade crossing, by moving the Cambus stop, installing a pedestrian table, improving signage and monitoring vehicular traffic.

**Recommendation:** Continue to review activity at this crossing to determine if further action is required.

11. Deficiencies in ADA parking for special events have been cited in recent years and were brought up during this review. When the Parking and Transportation Department is included in the planning, the parking plans for major athletic events are regularly reviewed and improved, but planning for concerts, shows, and many numerous smaller special events often tends to leave Parking and Transportation out of the process, often eliminating consideration for parking for persons with disabilities. Most deficiencies could be easily solved with some pre-event planning. Problems are the greatest when the organization hosting the event, does not control the venue. Concerts or the Home Show at Carver-Hawkeye Arena are one example; weeknight events on the east campus are another.

**Recommendation:** Improve contact with venues, organizations, government services and University departments who host special events to review the parking plans developed for their events. Include special event planning in a Parking and Transportation outreach effort.

## **FLEET SERVICES**

Fleet Services includes the 500 heavy and light-duty vehicle "leased" fleet operations for University departments, and about 60 more light duty vehicles that make up the University's daily rental fleet. In practice Fleet Services does not

encounter significant issues related to ADA, but there are several items of note to include here.

In recent years, Fleet Services has worked with two University Departments to acquire and operate accessible vans to transport employees with disabilities about the state as they conduct their work. These vehicles are assigned to, and driven by, individuals utilizing wheel chairs for their own work-related transportation. The vans have been specially modified Dodge Grand Caravans equipped with ramps, wheel chair locks located directly behind the driver's seats, and hand controls replacing the gas and brake pedals to aid the driver in their operation. These vehicular accommodations allow the employees to continue working independently.

Another recent accommodation involved a sight impaired employee who required the use of a leased vehicle. The employee required a chauffeur, but the chauffeur was not a University of Iowa employee. Only UI employees are allowed to operate Fleet vehicles under Risk Management guidelines. Risk Management worked with the Department, and with Fleet Services to find a way to make an exception to that rule and allow the driver to chauffeur the employee in their work.

# APPENDICES<sup>6</sup>

## Appendix A



### Accessible Web Design Survey

This survey is being conducted by the Information Technology subcommittee of the ADA Taskforce, which the President's office has designated to "Review the University's web and electronic resources for compliance with accessibility standards." To that end our subcommittee is assessing our web community's understanding of accessible web design and investigating what resources, either currently available on campus or otherwise are of use in designing accessible web resources.

Thank you for participating in this 5-10 minute survey. All responses to this survey are anonymous and will only be used for the purposes of this fact-finding investigation.

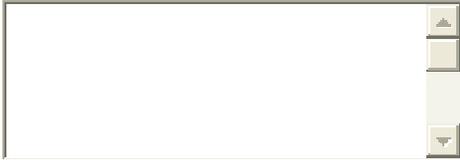
#### **1) Please rate your expertise and understanding of accessible web design.**

- Above Average – I have an in-depth understanding of accessible web design.
- Average – I think most of the web content I design is accessible to a variety of users including persons with disabilities.
- Below Average – I'm a little unsure if all my content is universally accessible.
- No knowledge – I don't have any knowledge of what accessible web design is.

#### **2) Please describe the process you use to evaluate the accessibility of web resources you create and/or manage (pages, applications, etc.).**

<sup>6</sup> If you are unable to access any of the documents in the appendices, please contact Jan Waterhouse in the Office of Equal Opportunity and Diversity at 335-0705 (voice) or 335-0697 (text) or by e-mail at [diversity@uiowa.edu](mailto:diversity@uiowa.edu).

3) Please describe what resources (tools, online tutorials, peers, etc) you utilize when designing accessible web resources.



4) What additional resources (tools, online tutorials, external groups) would help improve your knowledge and/or ability to provide accessible web resources?



5) Are you aware of the Accessibility Standards for Web Resources published on the University IT Policy website at <http://cio.uiowa.edu/policy/WebAccessibility.shtml>

- Yes
- No

6) How much emphasis do you put on designing web resources that follow these standards?

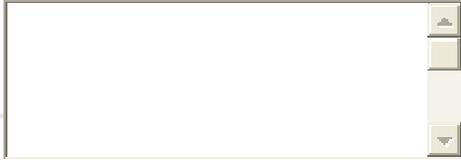
- All resources I design must meet these standards before being published.
- I make a good faith effort to adhere to these standards.
- I try to follow these standards, but occasionally they limit the functionality of my web resources.
- These standards have little applicability to my web resources.

7) Have you retrofitted any web resources for accessibility in the last 18 months?

- Yes
- No (Submits Survey)

Next Page

**8) Approximately how much time did the retrofit require? What rework of the web resource was required?**



Thanks for your participation!

### Student Services Subcommittee Service Units Report

This group was charged with focusing on programs and services for students with disabilities provided by student service units. Department heads were contacted by email requesting a meeting and provided with a list of topic areas for discussion and the website for more information about ADA. Whenever possible two members of the subcommittee met individually with identified student service department heads and/or designated staff during the time between February 13 and February 23, 2006. Standard questions (Appendix C) were used at each interview. The questions were divided into five categories for discussion: Awareness, Accessibility Process, Staff Training, Resources and Practical Application. Summary comments from these interviews are provided for consideration.

Awareness: All interviewees stated a basic understanding of compliance; however the specific application was vague in some cases. Most identified the “Accessibility Statement” from the Equal Opportunity and Diversity website as the primary method for informing students about requesting accommodations. During the interviews it was oftentimes necessary to refocus the conversation on programs and services accessibility rather than facility accommodations (i.e., elevators, doorways access, etc.) It seems that most were familiar with physical accommodations but may not be as conversant with the type of accommodations that might be requested by students with invisible disabilities.

Most felt adequately informed about ADA compliance and indicated they contacted Student Disability Services (SDS) or Equal Opportunity and Diversity (EOD) as primary information sources for assistance. However, there was also variety of additional responses for information including Evert Connors Center, UIHC, HR, Faculty/Staff Disability Services, General Counsel, Vice President’s office, Facilities, University Counseling, Hospital Social Worker, policy manual, and workshops.

Accessibility. Very few departments had written procedures for providing accessibility; however it was clear from the discussions that all departments were responding as situations arose. Departments with written internal documents concerning accessibility are included in Appendix E. At least two departments stated that because they only provide programs and services for a defined group of students, they were aware of the needs and requirements of those specific students. In all cases early identification by the student was required to receive an accommodation.

All departments stated that they used the EOD Accessibility Statement in event planning and considered location to be a primary consideration as well as availability of technology.

Staff Training. While some departments had not typically included discussion about working with students with disabilities in their regular ongoing training for any staff,

including student employees, many planned to add this component to future training and/or include specific agenda items at upcoming meetings for all staff. In general, many staff are aware of basic requirements of ADA and Section 504. Most of the departments stated that there are “go to” people that all staff knows to contact as questions or issues arise in this area. All interviewed stated that ensuring student confidentiality was an important consideration in all programs and services and emphasized in any training that occurs. Most of these departments are aware of general guidelines surrounding release of student record information and student disclosure of personal information. Most departments that had specific training programs did not include students in this training.

Resources. Many departments stated that although they did not have a specific line item budget for accommodations they would provide resources as necessary through internal reallocation. Two areas regularly provide accommodations because of the public nature of their events. In addition to availability of some funding in departments who may not have flexibility in reallocating funding, two departments stated they would like technology assistance specifically related to website accessibility and staff development opportunities for staff.

Practical Applications. Although only a few departments stated they had received specific requests for accommodations (interpreters, reader, identifying colored paper), the majority believe that because of the service nature of the departments, accommodations have occurred through the normal course of business operations because this is “the right thing to do”.

Some websites meet the UI ITS accessibility standards and most of the other departments stated they were in the process of updating their sites and would be certain to observe these standards during these upgrades. Not all departments included information about access for students with disabilities on their websites and those that did not stated they planned to review their websites to make certain they provided this information to ensure these students felt welcome in their departments.

General. Most departments interviewed indicated appreciation for raising awareness about ADA/504 compliance specifically a reminder about the invisible disabilities that may not be thought of as readily as physical or mobility accommodations. It is apparent that these department heads believe they are complying with the spirit of ADA/504 and doing “the right thing” many without describing it as policy compliance.

The primary recommendation from this subcommittee is to develop a model for training of all staff on issues related to students with disabilities. This training could be provided through an on-line module that could also be adapted for student employees and special situations that may not arise in all departments. This training should be highly recommended for all staff perhaps with a certification of completion.

Submitted by: Carole Collier, Michelle Harder, Belinda Marner, Dicta Schoenfelder  
February 27, 2006

Student Services Subcommittee  
Interview Questions of Service Units

**Awareness:**

1. What is your understanding of the compliance requirements for ADA *specifically regarding your department*?
2. Do you feel adequately informed about compliance?      YES      NO
3. Where do you get your information regarding your responsibilities regarding compliance?
4. Who do you contact with questions?

**Accessibility Process:**

1. What process does your department employ to ensure that programs and services are accessible to students with disabilities?
2. Do you have written procedures?    YES    NO    *Request a copy*
  - a. Does the procedure encourage early self-identification by the student as someone who needs a reasonable accommodation?
  - b. Does the procedure specify where the student should direct the request?
  - c. Do you provide alternative formats? *Please specify.*
3. What considerations are given to accessibility when planning events?

**Staff Training:**

1. What kind of training is provided for staff regarding students with disabilities?
  - a. Are staff trained to provide reasonable accommodations?
    - i. If alternative formats are needed, is staff trained to respond and provide?
    - ii. What if a person who is Deaf needs an interpreter?
  - b. Are staff knowledgeable about the requirements of ADA & Section 504?
  - c. Is ensuring confidentiality for students with disabilities a consideration in training?
  - d. Do staff members in the department know who to contact for questions regarding disability issues?
2. Is the entire staff trained including student employees?

**Resources:**

1. What resources are available to ensure compliance within your department?
  - a. Is your staff aware of disability services on campus? Which?
  - b. Do you budget for accommodations? *i.e. If you needed an interpreter for an event, how would you pay for it?*
  - c. Do you use UI information or guidance?
  - d. Other resources?
2. Do you have suggestions for resources? If you could have any resource what would you have?

**Practical Application:**

1. What kind of requests for accommodations have you had within the last 5 years?
2. How have you dealt with them?
3. Is your website accessible?
4. Is there information about accessibility on your website?

**Additional Comments:**

Is there any thing you would like to add?

Student Services Subcommittee  
Academic Units Report

**I. Scope of Review**

The goal of the Academic Group was to collect and evaluate information about the procedures utilized in the various academic units to provide reasonable academic accommodations to students with disabilities. Our scope did not include an evaluation of the Office of Student Disability Services (SDS), as such was included in the review of another group.

**II. Process Followed**

The Academic Group identified the following academic and academic-related units, and representatives of each unit, from which to gather information:

<b>Academic Unit</b>	<b>Representative</b>
College of Law	Linda McGuire
College of Dentistry	Yvonne Chalkley
Graduate College	Dale Wurster
College of Business	Jay Christensen-Szalanski
College of Liberal Arts and Sciences	Luke Flaherty
College of Education	Linda Fielding
College of Engineering	Alec Scranton
College of Medicine	Jess Mandel
College of Nursing	M. Pat Donahue
College of Pharmacy	Mike Kelley and Patricia McCormick
College of Public Health	Tanya Uden-Holman
Continuing Education	Ellen Holstein
International Studies/Study Abroad	Janis Perkins

We developed an interview tool (Appendix E) and interviewed the representatives from each unit.

**III. Summary of Results**

Many of the academic units exclusively utilize the services provided by SDS to determine eligibility of students for reasonable accommodations and to determine the specific reasonable accommodations to be provided. A few of the colleges, however, do not regularly utilize SDS and instead have developed their own procedures for reviewing requests for accommodation.

**Colleges utilizing SDS for accommodations:**

College of Engineering  
Graduate College  
College of Business  
College of Liberal Arts and Sciences  
College of Nursing  
College of Pharmacy  
College of Public Health  
College of Education  
Center for Credit Programs  
Study Abroad

**Colleges that do not regularly utilize SDS:**

College of Law  
College of Medicine  
College of Dentistry

In general, those colleges that utilize SDS for accommodation services appear to be satisfied with the expertise of and service provided by SDS. Those colleges have indicated that they rely on the SDS staff to determine eligibility for accommodations and also to determine what reasonable accommodations will be necessary and effective. Unless there is a question about the appropriateness of a particular accommodation given the requirements of a particular course, generally the accommodations recommended by SDS are implemented without hesitation.

In those colleges that do not regularly utilize SDS, the procedure for requesting accommodations is articulated through a written document and is communicated to students through various channels, including course syllabi and the college web site. In addition, the individuals responsible for making decisions about a student's eligibility and need for accommodation are knowledgeable about the particular field which is crucial to finding effective means of providing reasonable accommodations to students with disabilities. These procedures appear to be working well, based on the information gathered during this review.

We note that with multiple procedures for considering requests for reasonable accommodation, there comes a possibility of inconsistent outcomes. For example, an undergraduate student in the College of Liberal Arts and Sciences may request and receive reasonable accommodation during the undergraduate program, then go into the College of Medicine and be denied reasonable accommodation, or be granted different accommodations than were granted at the undergraduate level. This possibility for inconsistent results is concerning and may create a degree of risk for the University in terms of potential liability.

We also note an apparent deficiency in the training or education provided to faculty and teaching assistants related to providing reasonable accommodations to students with disabilities. Some colleges hold a new faculty orientation each year and such information

is included. However, most colleges do not appear to have a systematic process for disseminating this important information to faculty. This lack of information may lead to unintentional errors during the process of providing accommodations, or to students not receiving reasonable accommodations when they are entitled to the same.

#### **IV. Recommendations**

The Academic Group submits two recommendations for consideration.

First, we recommend that the University carefully review the various accommodation procedures in the colleges that do not utilize SDS, to determine whether there are any inconsistencies that could create legal risk for the University. Such a review could be coordinated by the University's ADA Coordinator.

Second, we recommend that the University develop and implement a plan to provide training and/or information to faculty and TA's relating to the ADA, Section 504, and providing reasonable academic accommodations. This plan could be developed through collaboration between SDS and the ADA Coordinator.

Respectfully submitted by:

Sam Cochran

Luke Flaherty

Jan Waterhouse

Student Services Subcommittee  
Interview Questions of Academic Units

**Reasonable Accommodations and Documentation**

1. Does the college/department have a procedure in place for providing reasonable accommodations to students with disabilities?
  - a. Does the procedure encourage early self-identification by the student as someone who needs reasonable accommodation?
  - b. Do your materials make it clear that it is the student's responsibility to request an accommodation and provide documentation of the disability?
  - c. Does the procedure specify where the student should direct the request? SDS or another office/person?
2. How are your students made aware of the existence of SDS and the services SDS offers?
3. Do all appropriate publications provide information about how to obtain reasonable accommodations?
4. Do faculty indicate on their syllabi and orally how to request reasonable accommodations including auxiliary aids and services?
5. Who is responsible for reviewing accommodation requests? Is there any collaboration with SDS?
6. What is the process utilized for reviewing documentation and verifying disabilities, including temporary disabilities, that may or may not qualify under the ADA? Is SDS utilized in every case?
7. If an attempt is made to verify present or past accommodations, is a waiver of confidentiality obtained from the student?
8. Are all records regarding a student's health condition and accommodations sent to SDS? Is any information maintained in the college or department?
  - a. Is there a policy that ensures such information is disclosed only to those who have a need to know?
9. Has your college/department designated a Disability Liaison to collaborate with SDS?
10. Are alternative exams offered at equally convenient locations, as often, and in as timely a manner as are other examinations?

11. Is there a process for evaluating requests for modifications to comprehensive examinations?
12. What is your process for evaluating requests for course waivers or substitutions due to a learning disability or other disability?
13. What auxiliary aids and services do you provide, if any?
14. What process is utilized to determine and provide auxiliary aids and services?
  - a. Who coordinates this process?
  - b. Is this person kept current on the latest technological advances?
  - c. Does he/she know where to find such information?
15. Does the school have a clear written policy on how to handle requests for recommendations to future employers or licensing authorities?
16. Do you have in place a policy for explaining reduced course load to potential employers should they happen to ask? (professional colleges)
17. Do your materials provide information about the University's grievance or appeal procedure relating to disputes about the existence of a disability or the denial of requests for accommodation?
18. What process exists for a student to appeal a failing grade on the basis that the failure was the result of inadequate accommodation?

### **Faculty Training**

19. How are individual professors and other instructional staff apprised of the University's policy on making reasonable accommodations for programs?
20. Is training provided to faculty, TA's, and instructional staff regarding:
  - a. the requirements of the ADA and Section 504
  - b. the procedures for providing reasonable accommodations
  - c. various disabilities and tips on classroom management of those disabilities? If not, do you perceive a need for this type of training?
  - d. the confidentiality of student records, including medical records

### **Specific Programs**

21. Continuing Education: Do the continuing education programs sponsored by the school or department comply with the ADA?
  - a. Is there a procedure in place for providing reasonable accommodations to students with disabilities?

22. Study Abroad: Do the study abroad program brochures provide information about the level of accessibility for students with physical disabilities?
- a. Is there a procedure in place for providing reasonable accommodations to students with disabilities?

### Student Services Subcommittee Student Survey Report

#### Characteristics of Survey Respondents

Among 191 students who visited SDS between January 17 and February 3, 2006, 70 students completed the survey, rendering a response rate of 36.6 percent. The distribution of disabilities represented by these 70 students resembles that of SDS registered students. The largest group is students with learning disabilities or attention deficit disorders (61%), followed by those with psychiatric conditions (17%), hearing impairment (17%), health conditions (14%), mobility (10%), vision (3%), speech (1%), and others (6%). Fifty six percent of the respondents were female, and 44%, male. The majority of them (61%) were under 22, while 13% were above 40 years of age. Fifty-six percent of them have been with The University of Iowa for one to four semesters, while some have been here for more than 15 semesters (6%).

#### Results

##### *Food and Beverage Vendors*

Most students reported no need for accommodations in this area. For those who expressed needs for accommodations, the majority of them considered accessibility to on-campus food or beverages “Excellent” or “Good”. However, a subset of students reported different experiences. Students with mobility concerns (N=7) were more likely to rely on on-campus vendors than other students, but were least satisfied with the accessibility. Three out of seven students rated their experiences with self-service vendors “Fair”; and one rated “Poor.” Similar responses were also reported concerning accessibility to restrooms (Three, or 50%, rated “Fair” and one, or 17%, rated “Poor”), or entrances/exits (Four, or 67%, rated “Fair”). In general, they considered food services staff helpful, but would like to have “more people available to provide help with trays and carrying items,” as one person commented. Two students expressed concerns about the high costs of on-campus dining services but had to rely on these services because of their mobility difficulty.

##### *Athletic Events*

Seventy-two percent (N=15) of the students who needed accommodations to attend UI sponsored athletic events at least attended occasionally. Among them 40% (N=6) considered it either “Very Important” or “Important” to their quality of experiences at UI to attend these events. Although a large number of students found signage/direction and staff’s willingness to help being “Excellent” or “Good,” parking and transportation were major complaints: Forty percent (N=6) of those who needed accommodations rated parking being “Poor,” among them were students with chronic health issues or mobility difficulty (N=2). Twelve percent (N=2) of students considered seating, and ability to see or hear “Poor.”

### *Social and Recreational Activities*

Among those students who needed accommodations for UI-sponsored social and recreational activities (N=17), most students (77%) attended these events at least occasionally. Forty-seven percent of these students considered it important to them to attend these events. Students' experiences in general were positive. Over sixty percent of these students rated "Good" or "Excellent" on the access to restrooms, seating, or access to entrance/exits, clarity of direction/signage, air quality, and staff's willingness to help. Again, parking continued to be the least satisfactory. Among those who attended these events, twenty six percent of them (N=5) rated "Poor" for parking. Thirteen percent of them (N=2) reported difficulty seeing or hearing, including one student who was hearing impaired. One student also commented on the need for captioning for movies, and another suggested installation of monitors to amplify sound and visual clarity.

### *Academic Activities and Accommodations*

Academic accommodations appeared to be most common among these survey respondents. Ninety six percent of them (N=66) had some forms of academic accommodations. Eighty eight percent of those who used academic accommodations considered their disabilities had at least a "Moderate" impact on their academic performances, and 98% of them consider academic accommodations "Important" or "Very Important" to their success at UI. The most common academic accommodations were extended time for exams (70%), distraction-reduced exam room (57%), note taker (43%), tape-recording lectures (26%), and reformatted texts (16%). The majority of these students had positive experiences in making arrangement for academic accommodations with the faculty (86% rated either "Good" or "Excellent"), and through SDS (95% rated either "Good" or "Excellent"). They felt the climate on campus was generally supportive for students with disabilities (87% rated "Good" or "Excellent"). A small percentage of students, however, did report some difficulty in making arrangement for academic accommodations with the faculty (1%) and through SDS (1%). Regardless their experiences in making arrangement for academic accommodations, 37% of these students who used academic accommodations reported that they had withdrawn from a course because of their disabilities, while 14% of them changed their majors because of their disabilities.

Many comments were articulated about academic accommodations. Although some comments related to specific situations, two themes clearly stood out. First, several students suggested that instructors could be better informed about disabilities and students' needs for accommodations. Second, some students found it frustrating to schedule exams at SDS given the limited available time, and recommended a return to its regular schedule.

### *Career Preparation*

Questions in this section address two types of career preparation: Career counseling and the quality of on-campus work experiences. Twenty nine percent (N=20) of all students who completed the survey felt their disabilities had restricted their choice of major or career interest. Although only 51% of these students had discussed their disabilities with

a faculty or staff member when considering their career choices, 73% of those who had not said they would be comfortable with such disclosure. Of those who had applied for work on campus (41%), the majority of them considered their experiences either “Good” (43%) or “Excellent” (43%). Among those who did not seek work on campus (N=41), only seven students did not because of their disabilities. Two out of these seven students had mobility concerns, two with hearing conditions, one with health conditions, and one with a psychiatric condition.

### *Health Care*

Fifty seven percent (N=40) of all survey respondents had some experiences with various health care services on campus. Among the most common reasons for these contacts were, in descending frequency, diagnosis (31%), health information (27%), counseling (27%), and immunization (24%). Students, in general, felt the health care staff were knowledgeable about disabilities (83% rated “Good” or “Excellent”), and willing to help (93% rated “Good” or “Excellent”). Although most students rated positively (“Good” or “Excellent”) toward transportation (68%), access to entrance/exit (76%), access to waiting area (83%), access to treatment area (90%), access to restrooms (88%), clarity to signage/direction (79%), and air quality (84%), parking remained the least satisfactory. Fifty eight percent of them rated parking being “Fair” (39%) or “Poor” (19%). One student specifically commented that few handicap parking slots were available at some large ramps, where many were located farther away from entrances or exits.

### *On-Campus Housing*

Sixty two percent (N=43) of the surveyed students have either lived in or applied for housing on campus. Among those who chose to live off-campus, a very small percentage (5%, or N=1) considered off campus housing because of his or her disability. Although the majority of the survey respondents did not seek housing accommodations, among those who did 20% of them (N=15) requested double-rooms, 10% (N=7) asked for single-rooms, and 9% (N=6) requested to live on a quiet floor. A sizeable number of students (28%, or N=15) who sought housing accommodations considered these accommodations either “Important” or “Very Important.” Among all areas of services, parking, again, was of great concern to these students. Fifty eight percent of those who responded (N=15) said parking was “Poor.” They included students with various disabilities, such as mobility difficulty (one out of two), health condition (two out of 10), and vision difficulty (one out of two). Although a small number of students had unsatisfactory experiences, most of them had relatively positive experiences (“Good” or “Excellent”) with access to computer lab (90%), transportation (78%), access to lounge area (69%), access to restroom/shower (60%), the noise level (60%), and air quality (38%). Most of them (79%) felt that the staff were willing to help, and 60% reported overall “Good” or “Excellent” experiences living in on-campus housing. Many students commented on their difficulty with roommates. It is possible that roommate conflicts, rather than their disabilities, accounted for a large portion of their unsatisfactory experiences with on-campus housing.

### Recommendations

- Parking is a major concern for students with disabilities. Having a sufficient amount of handicap parking slots near the entrance or exit of a facility is particularly important for those who need access to health care or on-campus housing due to their disabilities.
- Academic accommodations are critical to most students with disabilities and to their academic success. Approaches to facilitating and expanding these services, such as faculty and staff training on disability awareness, and expansion on SDS exam services will significantly increase the quality of these services, and their benefits to students.
- Proactive measures should be encouraged to facilitate on-campus employment opportunities for students with disabilities. These students will greatly benefit from academic advising, provided either through regular advisors, or faculty or staff mentors, that take into consideration their abilities and disabilities, whenever appropriate. Given the large number of students who withdrew from courses or changed majors because of their disabilities, advising that focuses on their learning processes and challenges is particularly critical on this large campus.

Student Services Subcommittee  
Student Survey

Dear Colleagues:

The University of Iowa is charged by President Skorton to review current ADA accommodations on campus. In order to have a clear understanding of how ADA accommodations are working for students with disabilities, the ADA Compliance Review Committee has designed the attached survey. Please distribute to all SDS registered students and ask them for their participation in this project. Results of this survey will be used to inform the ADA Compliance Review Committee for recommendations. These recommendations will be included in the final report to President Skorton for his review.

Please inform the students that it generally takes 10 to 15 minutes to complete this survey. Students should also be told that this survey is anonymous. Student's eligibility and accommodations will not be affected by their decision to complete this survey. Completed surveys can be dropped off at the research box located by the SDS front desk.

Students are encouraged to participate in one of the two scheduled group meetings at SDS if they would like to elaborate on their experiences and provide additional input. The dates and times are:

4:00 to 5:00 p.m., Monday, February 6, 2006

4:00 to 5:00 p.m., Thursday, February 9, 2006

Students may drop in at either time. No registration is necessary.

Thank you for your assistance.

Sincerely,

Dau-shen Ju  
Lioness Ayres  
Lauri Hughes  
ADA Compliance Review Committee

Dear Student:

The University of Iowa is charged by President Skorton to review current ADA accommodations on campus. In order to have a clear understanding of how ADA accommodations are working for students with disabilities, the ADA Compliance Review Committee would appreciate your help in completing this survey. Results of this survey will be used to inform the ADA Compliance Review Committee for recommendations. These recommendations will be included in the final report to President Skorton for his review.

Your response will remain anonymous. No one at SDS or in the UI system will be able to link your name to your answers. No services you receive from SDS or from UI will change as a result of your decision whether or not to participate in this survey.

Two group meetings are also scheduled at SDS if they would like to elaborate on their experiences and provide additional input. No registration is necessary.

The dates and time for the meetings are:

4:00 to 5:00 p.m., Monday, February 6, 2006

4:00 to 5:00 p.m., Thursday, February 9, 2006

Please come and join us if you can. Thank you very much for your help with this very important project.

Sincerely,

Dau-shen Ju  
Lioness Ayres  
Lauri Hughes  
ADA Compliance Review Committee

**Tell us a bit about you:**

Age: \_\_\_\_\_ Gender: \_\_\_\_\_ Number of semesters at UI: \_\_\_\_\_

**Your Disability Conditions (Check all that apply):**

- Vision
- Hearing
- Speech
- Psychiatric
- Mobility
- Learning disability and attention deficit disorder
- Health (metabolic, neurologic, brain injury, respiratory, gastrointestinal, etc.)
- Others? (Please specify): \_\_\_\_\_

## Section 1:

Whether or not you live on campus, many students buy food or beverages here. The following questions refer to any food or beverage outlet that is on campus. These questions do not apply to local eateries that are not part of the UI system (e.g., the Java House, or Milios).

If you **DO NOT** need any special accommodation in food service, please check **HERE** \_\_\_ and go on to Section 2.

How often do you buy food or beverages on campus?

- Always  Occasionally  
 Often  Never

How important is it to you to have food and beverages available for purchase on campus?

- Very important  A little bit important  
 Important  Not important

Accessibility is a concern for some people who buy food or beverages on campus. Below we ask you to rate the accessibility of various aspects of food and beverage vendors on campus.

Self-service food and drink

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Tables and chairs

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

- Rest rooms  
 Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

- Entrances/exits  
 Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

- Ingredient labeling at cafeteria/food cart  
 Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

- Vending machines  
 Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

- Air quality/absence of allergens  
 Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

How would you rate food services staff's willingness to be helpful?

- Excellent  
 Good  
 Fair  
 Poor

Please use the space below to describe any kind(s) of accommodations that would make it easier for you to get food or beverages on campus, or to describe any particular problems you might have had with food or beverage service on campus.

## Section 2:

**Below you will find a list of athletic events sponsored by The University of Iowa (football or basketball games, wrestling matches, etc.). For each event, you will be asked what your experiences have been. Keep in mind that these questions only refer to those events sponsored by the University.**

**If you DO NOT need any accommodation to attend athletic events, please check **HERE**  and go on to Section 3.**

How often do you attend UI sponsored athletic events?

- Always  
 Often  
 Occasionally  
 Never

How important is it to the quality of your experience at UI to attend university sponsored athletic events?

- Very important
- Important

- A little bit important
- Not important

Below is a list of accommodations that a student might need to attend athletic events. Thinking of the athletic events you WOULD LIKE TO attend, please rate the quality of the accommodations listed below.

Transportation

- Excellent
- Good
- Fair
- Poor
- Not applicable

Parking

- Excellent
- Good
- Fair
- Poor
- Not applicable

Entrances/exits

- Excellent
- Good
- Fair
- Poor
- Not applicable

Seating

- Excellent
- Good
- Fair
- Poor
- Not applicable

Ability to see/hear

- Excellent
- Good
- Fair
- Poor
- Not applicable

Restrooms

- Excellent
- Good
- Fair
- Poor
- Not applicable

Signage/direction

- Excellent
- Good
- Fair
- Poor
- Not applicable

Air quality/absence of allergens

- Excellent
- Good
- Fair
- Poor
- Not applicable

How would you rate facilities' staff's willingness to help?

- Excellent
- Good
- Fair
- Poor

Please use the space below to describe any kind(s) of accommodations that would make it easier for you to attend university-sponsored athletic events or to describe any particular problems you have had with attending university-sponsored athletic events.

### Section 3:

Some students participate in UI sponsored social and recreational activities. These activities include both entertainment (such as movies at the Bijou or performances at Hancher) and personal fitness activities.

If you DO NOT NEED any accommodation to use these facilities, please check HERE \_\_\_\_\_ and go on to Section 4.

How often do you participate in UI sponsored social or recreational activities?

- Always  Occasionally  
 Often  Never

How important is it to you to participate in UI sponsored social or recreational activities?

- Very important  A little bit important  
 Important  Not important

Below is a list of accommodations that a student might need to participate in social or recreational activities. Thinking of the events you WOULD LIKE TO attend, please rate the quality of the accommodations listed below.

Transportation

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Parking

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Entrances/exits

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Seating

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Ability to see/hear

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Restrooms

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Signage/direction

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

Air quality/absence of allergens

- Excellent  
 Good  
 Fair  
 Poor  
 Not applicable

How would you rate facilities' staff's willingness to help?

- Excellent
- Good
- Fair
- Poor

Please use the space below to describe any kind(s) of accommodations that would make it easier for you to enjoy social and recreational facilities, or to describe any particular problems you have had with using these facilities.

#### **Section 4:**

**The following questions concern academic activities and accommodations. Think about how your experiences may be throughout the year, in various weather conditions, and at various time of the day.**

**If you DO NOT need academic accommodations, please check HERE  and go to Section 5.**

What are the academic accommodations you have used? (Check all that apply)

- Tape recording lectures
  - Note takers
  - Reformatted texts (Braille, enlarged text, books-on-CDs, etc.)
  - Interpreters/transliterators/captioners
  - Personal FM amplification system
  - Adjustable table or wheelchair accessible room
  - Extended time for exam
  - Distraction-reduced exam room
  - NONE OF THESE APPLIES TO ME
  - Others? (Please specify)
- 

How important are academic accommodations to your success at UI?

- |   |   |
|---|---|
| <input type="checkbox"/> Very important | <input type="checkbox"/> A little bit important |
| <input type="checkbox"/> Important      | <input type="checkbox"/> Not important          |

How would you rate your experience in arranging academic accommodations?

- Excellent
- Good
- Fair
- Poor

How would you rate faculty's support in arranging academic accommodations?

- Excellent
- Good
- Fair
- Poor

How would you rate SDS' support in arranging academic accommodations?

- Excellent
- Good
- Fair
- Poor

In general, how would you rate the campus climate for students who use academic accommodations?

- Excellent
- Good
- Fair
- Poor

How would you rate the impact of your disability on your academic performance (attending class, completing assignments, meeting due dates, etc.)?

- Big impact
- Moderate impact
- Mild impact
- No impact

Have you withdrawn from a course because of your disability?

- Yes
- No

Have you changed your major because of your disability?

- Yes
- No

Please use the space below to describe any change that would make it easier for you to seek academic accommodations, or to describe any particular problems you have had with arranging academic accommodations.

### Section 5:

**One of the goals for college education is career preparation. Please think about how well this goal is achieved so far through your college experiences.**

Did having a disability restrict your choice of major or career interest?

Yes  No

Have you discussed your disability with a faculty or staff member when you considered your career goals?

Yes  No

If **NO**, would you feel comfortable having such a discussion with someone on campus?

Yes  No

Have you applied for work on campus?

Yes  No

If **YES**, how would you rate your experience of applying for work?

Excellent

Good

Fair

Poor

Do you think your disability influence the quality of your job seeking experience on campus?

Yes  No

If you **DID NOT** look for work on campus, did your disability influence your decision?

Yes  No

Please use the space below to answer the following question:

If you have not found work on campus and if you would like to find a job, what type of help would you need to achieve this goal?

**Section 6:**

**The following section describes health care available through Student Health Services (SHS), University Counseling Service (UCS), and University of Iowa Health Care (UIHC). Please consider any health care experience in which your disability has played a part, even though that condition may not have been the focus of your visit.**

**If you HAVE NOT used any University health care services, please check HERE \_\_\_ and go on to Section 7.**

From the list below, please check all of the items that apply to the care you received from SHS, UCS, and/or UIHC:

- Health information
  - Symptom management
  - Counseling
  - Health promotion (healthy lifestyle choices)
  - Substance abuse prevention/reduction (tobacco, alcohol, other drugs)
  - Others? (Please specify):
  - Diagnosis
  - Medication management
  - Immunization(s)
- 

Thinking about accessibility of health and counseling services at UI, how would you rate the following:

- Transportation
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

- Parking
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

- Entrances/exits
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

- Waiting areas
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

- Treatment areas
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

- Restrooms
- Excellent
  - Good
  - Fair
  - Poor
  - Not applicable

Signage/direction

- Excellent
- Good
- Fair
- Poor
- Not applicable

Air quality/absence of allergens

- Excellent
- Good
- Fair
- Poor
- Not applicable

Considering your experience with SHS, UIHC, or UCS this year, how would you rate the knowledge of staff about your disability and your health needs?

- Excellent
- Good
- Fair
- Poor

How would you rate the staff's willingness to help?

- Excellent
- Good
- Fair
- Poor

## Section 7:

**The following section concerns on-campus housing. Keep in mind that these questions only refer to housing facilities provided by the University.**

Have you lived in or applied for university housing?

- Yes
- No

If **YES**, please continue.

If **NO**, did your disability influence your decision?

- Yes
- No

If **YES**, please go to the last question of this survey.

If **NO**, you are **finished**. Thank you very much!

What types of housing accommodations have you requested?

- Accessible bathroom
- Quiet floor
- Single room
- Others? (Please specify)
- Accessible entrance
- Double room

---

How important is it for you to have housing accommodations on campus?

- Very important
- Important
- A little bit important
- Not important

Below is a list of accommodations related to housing on campus, please rate the quality of the accommodations listed below.

Transportation

- Excellent
- Good
- Fair
- Poor
- Not applicable

Parking

- Excellent
- Good
- Fair
- Poor
- Not applicable

Entrances/exits

- Excellent
- Good
- Fair
- Poor
- Not applicable

Restroom/shower

- Excellent
- Good
- Fair
- Poor
- Not applicable

Furniture

- Excellent
- Good
- Fair
- Poor
- Not applicable

Noise level

- Excellent
- Good
- Fair
- Poor
- Not applicable

Air quality/absence of allergens

- Excellent
- Good
- Fair
- Poor
- Not applicable

Lounge area

- Excellent
- Good
- Fair
- Poor
- Not applicable

Computer labs

- Excellent
- Good
- Fair
- Poor
- Not applicable

Signage/direction

- Excellent
- Good
- Fair
- Poor
- Not applicable

How would you rate the staff's willingness to help?

- Excellent
- Good
- Fair
- Poor

How would you rate the quality of your experiences living in university housing?

- Excellent
- Good
- Fair
- Poor
- Not applicable

Please use the space below to describe any kind(s) of accommodations that would make it easier for you to live on campus or to describe any particular problems you have had with housing arrangements.

**Central Policy Group  
Questions and Source  
42 U.S.C.**

This survey formulates its results from the responses given by those participating. The survey is not scientific and is for informational purposes only.

- |   |  |
|---|--|
| <input type="checkbox"/> <i>Employment Services</i> | <input type="checkbox"/> <i>Learning and Development</i> |
| <input type="checkbox"/> <i>Benefits</i>            | <input type="checkbox"/> <i>Employee Labor Relations</i> |
| <input type="checkbox"/> <i>FSDS</i>                |  |

*Employment Services, Benefits, Learning and Development, Employee Labor Relations:*  
**Sec. 12112(a)**

1. Are Operations Manual policies pertaining to recruitment, hiring, compensation, benefits, upgrading, promotion, training, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring consistently worded to assure equal opportunity and non classification/segregation of applicants and employees with disabilities?

- Yes                       No                       Unknown

**Sec. 1211 (b)(1)**

2. Do employment practices segregate or classify individuals in a way that adversely affects the opportunities or status of applicants or employees with disabilities?

- Yes                       No                       Unknown

*Employee Labor Relations:*

**Sec. 12112(b)(2)**

3. Do your employment contractual relationships assure qualified applicants and/or employees with disabilities are provided with the same opportunities as those without disabilities?

- Yes                       No                       Unknown

**Sec. 12112(b)(3)(A) and (B)**

4. Do your policies/practices concerning standards, criteria or methods of administration/implementation potentially discriminate against a person with a disability or perpetuate the discrimination of others subject to common administrative control?

- Yes                       No                       Unknown

*Employment Services, Benefits, Learning and Development, Employee Labor Relations:*  
**Sec. 12112(b)(4)**

5. Do your policies/practices discriminate against friends, associates or family members of a person with a disability?

Yes

No

Unknown

FSDS:

**Sec. 12112(b)(5)(A)**

6. Does the University have a policy and process concerning reasonable accommodation for applicants and employees?

Yes

No

Unknown

7. Is the policy and practice made known to University departments and employees?

Yes

No

Unknown

**Sec. 12112(b)(5)(A)**

8. Does the policy and process determine undue hardship?

Yes

No

Unknown

**Sec. 12112(b)(5)(B)**

9. Does the policy and process provide procedure to document decisions to not provide reasonable accommodation for reasons of undue hardship?

Yes

No

Unknown

10. Does the policy and process provide procedure to document decisions not to hire or promote because of undue hardship?

Yes

No

Unknown

Employee Labor Relations:

**Sec. 12112(b)(6)**

11. Do the requirements listed in position classifications and job descriptions and the criteria of employment tests relate only to job-relatedness and business necessity?

Yes

No

Unknown

Employment Services, Employee Labor Relations:

**Sec. 12112(b)(7)**

12. Are interviews and tests administered in an accessible environment?

Yes

No

Unknown

13. Are interviews and tests administered using materials that are in accessible formats?

Yes  No  Unknown

Employment Services, Employee Labor Relations, Learning and Development:

**Sec. 12112(b)(7)**

14. Do tests measure skills and capabilities versus reflect applicant/employee impairment?

Yes  No  Unknown

Employment Services, Employee Labor Relations:

**Sec. 12112(d)(2)(A)**

15. Does The University require applicant medical examinations for any position prior to making a job offer?

Yes  No  Unknown

**Sec. 12112(d)(2)(A)**

16. Do application forms include any questions intended to illicit disability information?

Yes  No  Unknown

Employee Labor Relations:

**Sec. 12112 (d)(3)**

17. Does the University require a medical examination of an individual (for any position) after a job offer is made?

Yes  No  Unknown

**Sec. 12112 (d)(3)**

18. If yes, do only those instances of medical examinations occur after a job offer has been made and prior to commencement of employment duties?

Yes  No  Unknown

Employment Services, Employee Labor Relations:

**Sec. 12112(d)(3)(A)**

19. Are all individuals offered a position in this job category required to participate in a medical examination?

Yes  No  Unknown

Employment Services:

**SEC. 12115**

20. Do you have EEOC employment notices posted in an accessible format for applicants and employees?

Yes

No

Unknown

Benefits:

Sec. 12201(c)(1) and (2)

21. Are University insurance plans and benefits consistent with State law?

Yes

No

Unknown

FSDS:

**Sec. 12201(d)**

22. Do University policy and procedures regarding accommodation, aid, services, opportunities, or benefits require a person with a disability to accept such services if the individual chooses not to accept?

Yes

No

Unknown

EOD, Employee Labor Relations:

**Sec. 12212**

23. Does the University have an investigative review, dispute resolution process and/or mediation service available to resolve disputes arising in the application and employment of a person with disabilities, including all issues and concerns found in employment services and programs?

Yes

No

Unknown

Additional services above/beyond the legal requirements above:

***College and Departments: Practice Sub Group Questionnaire***

This survey formulates its results from the responses given by those participating. The survey is not scientific and is for informational purposes only.

1. Are accommodations for employee(s) with disabilities provided internally by the department or with the assistance from the Office of Faculty and Staff Disability Services staff?

*Department*                       *FSDS Assistance*                       *Both*                        
*Unknown*

2. What are your feelings when learning an employee/coworker is in need of and receives a work accommodation?

*Positive*                       *Neutral*                       *Concerned*                       *Not Applicable*

If you have concerns, are your concerns related to: (check all that apply)

The department's financial expense for the accommodation?   
*Yes*  *No*

The employee's ability to perform the job with accommodation?  *Yes*  
 *No*

Coworker response to an employee receiving an accommodation?  *Yes*  
 *No*

Other:

3. How do you feel about how the accommodation request process is conducted?

*Positive*                       *Neutral*                       *Concerned*                       *Unknown*

If you have concerns, are your concerns related to: (check all that apply)

How the process protects employee and employer rights?  *Yes*  *No*

Timeliness of the process?  *Yes*  *No*

Results of the process?  *Yes*  
 *No*

Potential impact on coworker's  *Yes*  
 *No*

Ability to obtain timely and complete medical information  *Yes*  *No*

Other:

4. Do you believe workplace accommodations are helpful to employee(s) with disabilities in efforts to continue working?

*Always*       *Sometimes*       *Never*       *Unknown*

5. Do you believe workplace accommodations for people with disabilities benefit employing departments?

*Always*       *Sometimes*       *Never*       *Unknown*

6. Are you aware that employees with disabilities, even when receiving workplace accommodation, must still meet work requirements?

*Yes*                       *No*

7. Are you aware the University has policy and procedures to provide reasonable workplace accommodation for employee(s) with disabilities when the disabilities disallow the employee to adequately conduct work requirements?

*Yes*                       *No*

8. If you are a person with a disability or as a supervisor you employ a person with a disability and need employment resources and information would you first seek assistance from:

*Your supervisor*       *HR Unit Representative*       *Senior HR Representative*  
 *FSDS*

9. Are you aware that all employment related events and activities must be accessible to employees with disabilities?

*Yes*                       *No*

10. Comments:

*People with Disabilities: Practice*

This survey formulates its results from the responses given by those participating. The survey is not scientific and is for informational purposes only.

1. Were you aware before communicating with Faculty and Staff Disability Services that the University has policy and procedures to provide reasonable workplace accommodation for employee(s) with disabilities?

*Yes*                       *No*

2. When you requested workplace accommodation, did you feel the response was timely?

*Yes*                       *Somewhat*                       *No*

3. Do you believe the workplace accommodation has been helpful to you in your work?

*Always*                       *Sometimes*                       *Never*

4. How do you feel about how the accommodation request process was conducted?

*Positive*                       *Neutral*                       *Concerned*

5. Do you and your supervisor and/or HR Representative review the success of the accommodation that you have received?

*Yes*                       *Occasionally*                       *Never*

6. Do you believe your coworkers are sensitive to why you have received workplace accommodations and are supportive of you?

*Yes*                       *Somewhat*                       *No*

7. Are you aware that all employment events that you wish to attend/participate must be accessible to you?

*Yes*                       *No*

8. If you need to discuss accommodation needs from whom do you first seek assistance?

*Your supervisor*       *HR Unit Representative*       *Senior HR Representative*  
 *FSDS*

9. Comments: