This report of the recent program review site visit will be presented in five sections:

- General Information/Observations
- Staffing Issues
- Policy/Procedure Issues
- Facilities/Space
- Recommendations

**General Information**

The Disability Resource Center (DRC) of the University of Nevada, Reno, is the designated unit within the University structure assigned responsibility for assuring that UNR provides appropriate support/service to students with disabilities. In keeping with both the legal mandates for equal access (Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act, as Amended), and the commitment of the institution to assure full access and participation for all students at the institution, the DRC is charged with the collection and review of disability documentation, assigning appropriate accommodations and services based on students’ documented needs, and working with other institutional personnel and units to effect equal access to educational opportunity for qualified students with disabilities.

The DRC enjoys a solid reputation throughout the institutional community. The DRC is centrally located on campus. The functions of the office seem well known throughout campus, and the DRC regularly sees students on referral from faculty and staff. DRC staff report that cooperation with other units is generally very good, and that the administration has been consistently supportive of the DRC efforts.

The DRC has developed an excellent tracking system for its records, and is able to provide a wealth of information regarding the students with disabilities being served. In the fall 2009 semester, 738 students were enrolled and registered with the DRC; 431 received services and accommodations. This confirms an ongoing trend of increasing numbers (up 19% from fall semester, 2008). This averages out to a case load of 100 students per administrative faculty. It is important to note that this number includes several populations of students whose service-related
needs are extensive (for example, students who are deaf or hard of hearing, those with autism spectrum disorders, and those who are using alternative media produced in-house). Additionally, an increasing number of requests come from students engaged in online activities at some level. Service to each of these populations poses a challenge to both the resources and facilities available to the DRC, as will be noted later in this report.

**Staffing Issues**

The DRC currently has the following staffing configuration:

- Mary Zabel – Director
- Mary Anne Christensen - Assistant Director
- Geoffry Kettling – Coordinator
- Allison Bussa - Coordinator
- Michelle Bruce – Administrative Assistant
- Jody Wicker – Administrative Assistant

In addition, the DRC employs 25 student workers and work study students (who provide 400 of hours/week service), as well as an average of 60 notetakers each semester. In addition the DRC contracts for sign language interpreters and transcriptionists.

The DRC has done an excellent job of organizing their human resources to provide quality service to the university community while at the same time maximizing the use of their time and energies. Recognizing that faculty and staff were referring a significant number of students to the DRC who were not disabled, but who needed to be effectively linked to other support services within the institution, the DRC has created a pre-intake procedure (referred to internally as a “screening” procedure for intake interviews). The DRC’s Administrative Assistant interviews students and gathers information about why they were referred and what kinds of support they might be seeking. If the student does seem to have a disability-related need, an appointment is made with one of the DRC professional staff members and all preliminary information gathered is passed along. In this way, the Administrative Assistant can balance the caseloads of the counselors (as well as refer students to counselors with specific or unique expertise in their area of disability). If the student is in need of other kinds of institutional support (such as personal counseling, tutoring, or other academic intervention), the Administrative Assistant makes referrals and helps to arrange contact between the student the appropriate support unit.

There is one significant gap in the DRC’s staffing configuration. There is an urgent need for a full time professional who can manage the large and growing need for technological expertise within the DRC. At this time, the Assistant Director is overseeing the technology demands in addition to her regular duties as Assistant Director, a near to impossible task. In the current semester, more than 50 students with disabilities are actively using assistive technology in support of their academic pursuits. The DRC provides access to alternative media (much of it produced in-house) for more than five dozen students. Thus far in the spring 2010 semester, materials have been requested for 147 UNR courses. The DRC has produced over 191 textbooks, 200 materials for WebCampus (Learning Management System) and 60 course reserves in alternative format. The number of online offerings from UNR is increasing, while the number of campus-based classes that use the institution’s Learning Management System
(LMS) for support is estimated at more than 80%. This means that the vast majority of students with disabilities enrolled at UNR will need to have some facility in working with/through technology during their time at the University. The DRC needs a full-time staff member who is knowledgeable about technology and about the functional limitations imposed by disability, who can facilitate and support the continuous expansion of alternative media production, organize the Center’s technology functions, and work with students to resolve technology-based problems when they arise. Moreover, the DRC’s website is in need of significant revision (see recommendations). While it might be possible to hire outside expertise to re-do the website, it would be highly preferable to have someone with that expertise on the DRC staff, so that the website can be updated and new information incorporated as needed, rather than waiting for too many months/years for overhaul.

Of note, it would also be appropriate to consider updating (adding to) the job description for DRC Director Mary Zabel. In addition to the duties and responsibilities shown, Ms. Zabel has long been a kind of unofficial “go-to” person for the Nevada System of Higher Education (NSHE) when issues arise regarding policies/practices/procedures surrounding service to students with disabilities. While adding some formal recognition of her liaison status with the State System would not impact her existing workload (as she already fulfills this duty), it would provide formal recognition of her expertise and the esteem in which she is held, while also acknowledging service to the NSHE (by Ms. Zabel and by UNR) which is currently unheralded.

Policy/Procedure Issues

While staff from the DRC engage in ongoing review of policies and procedures in order to make appropriate changes as necessary, it is clear that there needs to be a detailed review/update of a few existing policies as well as a general review of the operating policies and procedures of the DRC in order to assure their continued relevance, appropriateness, and cohesion. Emerging populations of students with disabilities (for example, students with Asperger’s and injured Veterans), as well as the changing nature of the academic experience (i.e., the aforementioned increase in technology use and involvement) require that existing guidance be updated and broadened to meet new challenges and demands.

Specific policies discussed:
Two policies were discussed in some detail during the site visit – the Grievance Policy and the policy regarding requests for disability-related special housing assignments.

- Concerns surrounding the grievance policy centered on whether the steps in the process were appropriately identified and explained (that is, the difference between informal and formal resolution of grievances and at what point a student might be instructed to seek further redress outside the DRC, through appropriate institutional or legal channels).
- The institution is also seeing a rise in the number of requests for disability-related special housing assignments that are for less immediately recognizable reasons (that is, not just access for the wheelchair user, but a private room for the student with Asperger’s, and so on). The Residence Life office is, understandably, becoming uncomfortable with either collecting information or making informed decisions regarding the appropriateness of those requests without input from DRC. A template for inviting information in support
of disability-related housing was shared with the DRC staff, and there was some
discussion about moving the decision-making responsibility from Residence Life to the
DRC.

Both revised policies will be reviewed by the consultant, on request, when they have been re-
worked by the DRC staff. Additionally, the staff was encouraged to review all policies and
procedures to see if additional wording or instructions would help to clarify expectations. This is
particularly important for emerging populations of students for whom traditional practice may
not adequately respond to their new realities (for example, revising policies that require face-to-
face interaction with DRC staff for students who are taking only online classes, or more
welcoming and inclusive language to reach out to wounded veterans who do not recognize
themselves as “disabled” in the traditional sense).

Several protocols for managing accommodations and office procedures (some new, some
revised) were also reviewed.
- Procedures for internal control of tests taken through the DRC were reviewed. As the
  most highly utilized service within the DRC the Administrative Assistant who manages
  the Alternative Testing Program has done a fine job in establishing protocol and
  coordinating the daily operations of the Alternative Testing Program. It is important that
  such controls be well-established, rigorously followed, and broadly disseminated to
  students and faculty, both for purposes of maintaining academic integrity of the testing
  process, and to assure credibility of that process throughout the University community.
  Of particular concern was the protocol for returning tests to the faculty member after
  completion. The consultant will review the revised procedure when it is completed to
  offer further comment/suggestion. Control and sanctions for cheating are also of concern
  at this time. While the DRC has not seen any notable increase in attempts at academic
dishonesty associated with the Alternative Testing Program, the sheer volume of tests
being proctored, as well as limitations in space and staffing are cause for concern in the
near future. These concerns impact on the space/facilities issues discussed below.
- As noted above, the DRC has instituted a procedure to pre-screen students referred to the
  DRC, to assure that their needs are a good match for the disability-related services and
  support the DRC offers. Students meet first with the Administrative Associate, who
determines whether they need to see one of the DRC counselors (and, if so, assigns a
counselor with appropriate expertise), or whether they would be better served by some
other unit within the institution. In the short time that the procedure has been in use, it
has proved very successful in maximizing the use of the professional counselors’ time. It
was recommended that the counselors work with their screening coordinator, to develop a
formal intake form to guide these initial interviews. While not all the questions may need
to be asked in each circumstance, the information garnered from those questions that are
asked, when recorded, will alleviate the need for the counselor to repeat those inquiries
during the formal intake procedure.
- Discussion of the need for a full time Assistive Technology Specialist who could take on
responsibility for updating the DRC’s website led to further consideration of how else the
DRC might embrace the virtual environment of higher education today. Among these
considerations: (1) accepting online, student-initiated, requests for services (as opposed to
requiring on-campus students to come to the DRC to meet with a counselor and request
services directly; (2) sending out Letters of Accommodation through electronic means; and (3) what information and records could or should be kept in the DRC’s shared database/files, rather than in hardcopy format.

• The nature and scope of documentation required to establish eligibility for services and allow for prescriptive assignment of accommodations is of perennial concern to disability service providers. Discussion of documentation during the site visit revolved around these issues: (1) the impact of the ADA Amendments Act on how colleges and universities view documentation; (2) refocusing the review of documentation in-house to shift focus from strict decisions establishing eligibility to a more discerning approach in establishing the need for accommodation; and (3) how best to serve students who bring documentation from K-12 or from other higher education institutions in Nevada who typically require less formal/substantial evidence of disability and disability-related need for accommodation.

Facilities/Space:
While the space currently occupied by the DRC is adequate for housing the staff and managing their immediate files and responsibilities, it is quickly becoming restrictive in assuring adequate workspace for the significant task of creating alternative media for students, as well as for providing a quiet, proctored setting for students taking tests through the DRC. Moreover, the overlapping use of existing space often is counterproductive. The bustle and noise associated with production of alternate media – including 2 Braille embossers -- by a team of individuals can create distractions for students using the available testing suites.

It seems clear that more space will need to be identified for use by the DRC in fulfillment of its assigned institutional responsibilities for students with disabilities. The logical expansion of space would be to re-task the space across the hall from the DRC, on the first floor of the Thompson Building into space currently occupied by Student Success Services and Tutoring. Such expansion would require less physical renovation than other areas on campus, since the space already is largely divided into individual carrels and offices that could be used for testing purposes. A video monitoring system could be added to the existing space that would allow central monitoring of a large number of students taking tests simultaneously. The physical proximity to the existing DRC facilities would allow for easy and secure administration of the alternative testing process, as locked files containing tests could remain in the confines of the secure DRC space, while students taking tests could be monitored and supported by DRC personnel from their existing offices.

In discussing this possible expansion and use of space, it was noted that the DRC is often asked to monitor tests for non-disabled students as a courtesy to faculty who have approved alternative testing for students in other contexts. Recently, many of these requests have had to be refused because of lack of space to manage even internal testing responsibilities. With additional, dedicated personnel and re-assignment of the space across the hall, the DRC might be able to establish a University Testing Center that could take on a broader role in supporting the institutional community while at the same time providing the controlled and secure testing environment needed for/by students with disabilities.

Recommendations:
Specific recommendations are listed here (and supported by discussion above):

- A full time Assistive Technology Specialist should be hired as soon as possible to manage and support a wide range of activities including (but not limited to) the production of alternate media, training and support for students with disabilities using assistive technology, responsibility for working with other units within the institution to assure accessibility of the institution’s online presence (from public areas on the UNR website to the use of an accessible LMS to organize online learning activities), and the revision and management of the DRC website.

- The stated job description of DRC Director Mary Zabel should be expanded to reflect her current service to the Nevada State System in providing both expertise and liaison for issues concerning students with disabilities.

- The grievance policy for students with disabilities and the policy regarding what information will be collected and how decisions will be made in response to disability-related housing requests should be revised based on the discussion during the site visit. The consultant will review and make suggestions on draft versions of these revised policies.

- All DRC policies and procedures should be reviewed to assure that they are broad enough to insure full inclusion and use by emerging populations of students with disabilities.

- The guidelines for the organization and use of alternative testing program should be reviewed. Of particular note: (1) procedures for delivery/return of tests to and from faculty; (2) clear assignment of responsibility to faculty, students, and DRC in assuring the seamless delivery of this important service; (3) active dissemination of policies and procedures for alternative testing across both students and faculty, with strict note of possible sanctions for failure to meet deadlines or for academic dishonesty.

- A preliminary intake interview form should be developed for use by the screening coordinator during initial meetings with students. This form will be used to collect necessary information in a systematic fashion so that students who are passed along to professional counselors in the DRC will not be asked to repeat basic information during the more in-depth review of their needs/concerns.

- The DRC website is long overdue for revision. Additionally, staff of the DRC should give serious consideration to how virtual communication mechanisms can be incorporated into ongoing activities, including requests for accommodation, notification of faculty, and interaction between students and staff.

- Implementing the use of technology plans as part of the intake process for students requesting services from the DRC.

- The DRC faces serious constraints from its limited space capacity. Possible expansion into space currently occupied by Student Success Services should be considered. With additional staffing to support the concept, this reallocation of space might be the impetus for development of a University Testing Center.

**Conclusion:**

A recent quip from a late-night talk show host suggested that “all true wisdom is found on T-shirts.” Ironically, on my way home from the Reno site visit, I saw someone wearing a T-shirt that read, “We have done so much, for so long, with so little, that we can now do anything with nothing.” That is an all-too apt description of the work done by the DRC and its staff on behalf of UNR. The problem is that they have provided information and support so well, for so long, to
students with disabilities and to the larger university community, that their efforts go largely unnoted. As a result, they are fast approaching the point at which the need will outstrip the available resources (especially in staffing and space). It would be unfortunate to see a unit that has served the institution with such success over time become visible only when it can no longer keep up with the expected workload. While some of the recommendations made as a result of this site visit are for the DRC staff to implement, the urgent nature of the recommendations for staffing and space should not be understated. The Disability Resource Center at the University of Nevada, Reno, offers excellent support and service to students with disabilities, and thus brings well-deserved recognition to the institution. They need the continued support of the University administration, in both tangible and intangible ways, in order to continue their efforts.

“We should not be shy about admitting the costs associated with compliance with ADA/504. Our willingness to assume those costs bespeaks our commitment to a higher ideal than the bottom line.”

Michael Masinter
Broad Shepherd Law Center
Nova Southeastern University