CHEPP

The Center for
Higher Education Policy
and Practice

**ONLINE BY DESIGN:
HOW ACCESSIBILITY IS FUNDAMENTAL
TO LEARNER-CENTERED DESIGN**

JULY 2024

Introduction

In the United States today, more than 21 percent of undergraduate college students identify as having a disability (National Center for Education Statistics (NCES), 2023).[1] As nearly a quarter of the student population identifies as disabled, it is imperative that higher education become more accessible and inclusive of all learners. Unfortunately, higher education systems have historically fallen short in meeting the needs of these learners in both in-person and online settings (ADA National Network, 2021). As a result, only 18% of disabled adults over 25 have a bachelor's degree – half the rate of adults without a disability (Field, 2023). With college degree attainment continuing to be a leading indicator of economic stability and overall well-being, this disparity is even more alarming. Higher education must make changes to increase college attainment for learners with disabilities by investing in robust accommodations and expanding accessible multimodal higher education program offerings with universal design for learning, among other impactful, evidence-based practices.
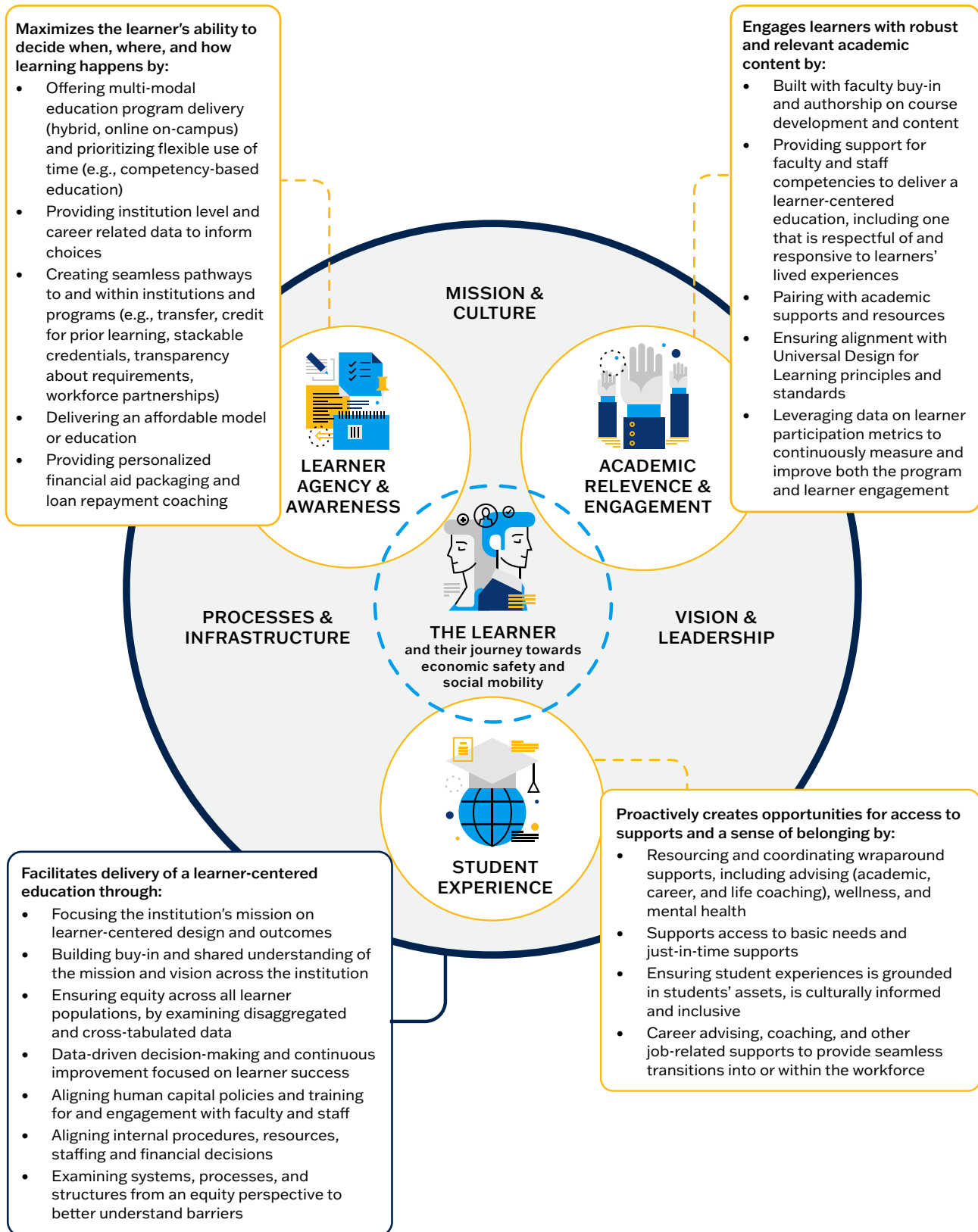
This paper is the second in a series about the importance of learner-centered design in higher education. The first paper, *Online by Design: How Learner-Centered Higher Education Design and Delivery Accelerates Equitable Access and Outcomes*, presents a framework for learner-centered design and introduces the importance of accessibility and universal design in online environments (Center for Higher Education Policy and Practice (CHEPP), 2024). Accessibility in higher education, regardless of modality, is critical not only to meeting the needs of learners with disabilities but also, as a function of learner-centered design, to providing more inclusive academic programs and cocurricular activities for all learners.

Additionally, the paper focuses on the importance and opportunity of disability inclusion in higher education and elevates what some higher education institutions and practitioners are doing to meet the essential needs of students with disabilities. It includes a set of key elements of accessible education informed by strategies institutions have used to expand access and connects each of these elements to CHEPP's learner-centered design framework (see Figure 1 on page 3). The framework demonstrates how systems might be designed to center the learner in institutional mission, vision, and processes; and details the key components of a learner-centered experience - academic relevance and engagement, learner agency and awareness, and student experience. The paper imparts how important it is for accessible design to be implemented with a continuous improvement mindset and actions, including with data and processes to make changes over time to better meet the needs of learners with disabilities in all higher education modalities. Lastly, the paper includes policy recommendations for institutions of higher education and federal policymakers to advance accessibility and inclusion for learners with disabilities and support their persistence to a degree.

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[1] This report uses person first and identity first language. This choice was made to honor the preferences, cultures, and identities within the disability community.

Figure 1. A Learner-Centered Design Framework*

A Learner-Centered Design Framework

Maximizes the learner's ability to decide when, where, and how learning happens by:
- Offering multi-modal education program delivery (hybrid, online on-campus) and prioritizing flexible use of time (e.g., competency-based education)
- Providing institution level and career related data to inform choices
- Creating seamless pathways to and within institutions and programs (e.g., transfer, credit for prior learning, stackable credentials, transparency about requirements, workforce partnerships)
- Delivering an affordable model or education
- Providing personalized financial aid packaging and loan repayment coaching

Engages learners with robust and relevant academic content by:
- Built with faculty buy-in and authorship on course development and content
- Providing support for faculty and staff competencies to deliver a learner-centered education, including one that is respectful of and responsive to learners' lived experiences
- Pairing with academic supports and resources
- Ensuring alignment with Universal Design for Learning principles and standards
- Leveraging data on learner participation metrics to continuously measure and improve both the program and learner engagement

MISSION & CULTURE

LEARNER AGENCY & AWARENESS

ACADEMIC RELEVENCE & ENGAGEMENT

PROCESSES & INFRASTRUCTURE

THE LEARNER and their journey towards economic safety and social mobility

VISION & LEADERSHIP

STUDENT EXPERIENCE

Facilitates delivery of a learner-centered education through:
- Focusing the institution's mission on learner-centered design and outcomes
- Building buy-in and shared understanding of the mission and vision across the institution
- Ensuring equity across all learner populations, by examining disaggregated and cross-tabulated data
- Data-driven decision-making and continuous improvement focused on learner success
- Aligning human capital policies and training for and engagement with faculty and staff
- Aligning internal procedures, resources, staffing and financial decisions
- Examining systems, processes, and structures from an equity perspective to better understand barriers

Proactively creates opportunities for access to supports and a sense of belonging by:
- Resourcing and coordinating wraparound supports, including advising (academic, career, and life coaching), wellness, and mental health
- Supports access to basic needs and just-in-time supports
- Ensuring student experiences is grounded in students' assets, is culturally informed and inclusive
- Career advising, coaching, and other job-related supports to provide seamless transitions into or within the workforce

*Note: More details on the framework can be found in CHEPP's paper: *Online by Design: How Learner-Centered Higher Education Design and Delivery Accelerates Equitable Access and Outcomes* (CHEPP, 2024).

Barriers to Accessibility and Inclusion

There are many barriers to inclusion and accessibility in higher education that result in students with disabilities never enrolling or eventually dropping out (Government Accountability Office (GAO), 2024). These barriers exist throughout higher education systems because higher education was not originally designed to meet the needs of learners with disabilities. At its inception, higher education was exclusive to male learners of high financial means pursuing a limited set of professions. Since then, economic demands have driven higher education to serve more and more people, including those with disabilities. The passage of the Americans with Disabilities Act (ADA) in 1990 and Section 504 of the Rehabilitation Act more than 50 years ago gave people with disabilities a right to have reasonable accommodations in higher education. However, students with disabilities have continued to be an afterthought, with many colleges failing to provide the services and systems they need to persist and succeed. Perpetuating this problem, learners with disabilities are also left out of critical data gathering among institutions that indicates how learners persist and complete college. Without longitudinal data that accurately measures persistence and success gaps, it becomes even more difficult for institutions to advocate for additional budgetary resources to increase supports and accessible programming. When disabled students are able to access accommodations, they largely rely on add-on supports instead of wholly accessible systems.

This disparate system leaves many disabled learners choosing to not disclose their disability because they fear shame or resentment. When learners with disabilities disclose their disability, they often struggle to get the accommodations they need, and when they do receive the right supports, they often enter systems not set up to cultivate belonging.

Instead of learners with disabilities being an afterthought, their needs should inform higher education design. Focusing on needs of such learners in systems and structures should include informing faculty and staff training, ensuring that data evaluation systems include learners with disabilities, and having budget planning processes that embrace accessibility and inclusion. When systems are built to serve all learners, they serve everyone better. Look no further than the curb-cut effect, a phenomenon in architecture that has shown that when more accessible curb-cuts, ramps, and elevators are present, many other populations benefit as well. For example, parents with strollers and older individuals can more easily access public places. Higher education can do this too.

Higher Education Frequently Places a Burden of Proof and Access on Learners Instead of Designing System-Wide Supports to Meet Their Needs

Learners with disabilities enrolling in higher education after they graduate from high school have to navigate a different set of processes to access accommodations; these can be confusing and result in less support than they received throughout their secondary education (Roberto, 2023). Under federal law, the Individuals with Disabilities Education Act (IDEA), public K-12 education systems are legally obligated to provide students with disabilities access to a free and appropriate public education in their least restrictive environment in exchange for federal funding (ADA National Network, 2019). To do this, public school systems provide students with disabilities individualized education programs (IEPs) – working with their teachers, special education professionals, and parents to determine how they can best access and move through their curriculum alongside their peers. This hands-on process can provide students relatively comprehensive accommodations like assistive technology, one-on-one support through a paraprofessional, and occupational therapy. Although public school systems can and do fall short of their legal obligations, students and their families have recourse to immediately address and hold schools accountable to meet their legal obligations to provide students with disabilities an equitable education. IEPs are also required to include transition planning for postsecondary or career pathways after high school graduation, but this is inconsistent depending on the district and state and can leave students unprepared.

The rights framework in higher education is much different: when students with disabilities who have IEPs graduate from high school and enroll in college, they enter a system that relies on their self-advocacy to access their rights and receive their accommodations under the Rehabilitation Act (Section 504) and the ADA (Northwestern University, n.d.). Under these laws, higher education institutions are required to provide students with disabilities reasonable accommodations to access their programs.[2] But unlike in the public K-12 system, students must self-identify as having a disability rather than educators identifying the student and moving forward with providing services.

Each institution has its own accommodations policies which create varying degrees of access across the higher education sector. As part of this, institutions determine the process by which learners with disabilities qualify for reasonable accommodations – often requiring learners to self-pay for assessments to "prove" they have a disability, many times after receiving accommodations for the same disability throughout their K-12 education.

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[2] More details on requirements for higher education institutions to serve learners with disabilities can be found on the Department of Education website: https://www2.ed.gov/about/offices/list/ocr/docs/auxaids.html.

"Accommodations are an entitlement for students, not a negotiable."

— Jennifer Braden, ADA Coordinator, Office of General Counsel & Compliance,
Southern New Hampshire University (SNHU)

Another factor that creates barriers for learners with disabilities is perceptions among educators and administrators in higher education. One study found "the most frequent barrier faced by students with disabilities lies in how they are perceived by faculty once they reveal their need for accommodations. Students report feeling judged, humiliated, and embarrassed by professors, who often assume they are less capable than their peers due to their disability" (Roberto, 2023). Once a learner qualifies for accommodations, institutions have different processes in place to determine what is and is not considered reasonable. Some institutions work diligently to meet learner needs by putting accessibility at the center of program design, while others provide a standard set of accommodations like notetakers and large print textbooks, referred to as auxiliary aids and services by the ADA.

Once eligible for accommodations, learners are typically responsible for self-reporting their needs to faculty in classes – resulting in a range of accessibility issues across a learner's coursework. This complex system can result in students forgoing interactions with disability services altogether, with about one-third of college students who identify as having a disability informing their college (NCES, 2022).

Sidebox 2. Ryan's Story
As an infant, Ryan had a pediatric tumor resulting in the loss of his vision and several rounds of chemotherapy throughout his life. Ryan started taking online courses at SNHU during the COVID-19 pandemic when he was still in high school. He later enrolled full-time on SNHU's Manchester, NH campus and graduated at 18 years old in 2022 with his BS in criminal justice. He plans to attend law school. During his studies, Ryan worked closely with SNHU's accessibility center and New Hampshire's orientation mobility instructor to navigate campus and fully access his curriculum, including receiving brailed hard copies of his textbooks and PowerPoint presentations ahead of class. He was also able to ensure that his schedule fit around his medical appointments (CHEPP, 2023).

Sidebox 3. Nick's Story
Nick, an SNHU transfer student, suffered an accident early in his college career that left him with minimal use of his hands. Prior to enrolling at SNHU, Nick attended two other higher education institutions that did not meet his needs. Despite his choosing SNHU for its flexibility, online programming, and overall accessibility, by his own admission he did not reach out to SNHU's accessibility office as much as he retrospectively thought he should have. While Nick understood that he would need assistance with key actions like typing, turning pages, and making presentations, he wanted to be independent and figure out how to navigate his academic career on his own. He personally employed his friend to help him with actions he could not easily do on his own and he used dictation software that he researched himself. Nick graduated from SNHU in 2016 with a degree in business administration.

While the ADA and the Rehabilitation Act open the doors to higher education, these laws are a mere foundation for how learners with disabilities should access equitable postsecondary education opportunities. When examining accessibility through a learner-centered design framework, institutional systems may need to build on their current systems to offer additional supports and engagement strategies. This holistic approach should work across systems and core planning to ensure that learners with disabilities have equitable agency, academic engagement, and overall experience. In doing this, institutions will ensure that learners with disabilities have what they need to not only persist and complete their academic programs but also fully belong in their college communities alongside their peers, with and without disabilities. This approach extends to an institution's commitment to having an inclusive environment by proactively recruiting students with disabilities. This approach would also include communicating directly and through broad-based platforms that learners with disabilities have equitable access to academic and cocurricular programs.

Building Belonging is Critical for Learner Persistence and Success

Feeling a sense of belonging is integral to persistence and completion for all students, including those with disabilities, and all learners who have historically been underserved by higher education. Research suggests that four system-wide changes are needed to create a more inclusive university: "(1) accessible physical spaces; (2) proactive support and attention during the transition to higher education, i.e. the first year of university; (3) faculty training to ensure readiness to meet the needs of students with disabilities … and (4) training for typically-abled peers to ensure an inclusive campus climate" (Smith, Woodhead, & Chin-Newman, 2021). Creating an environment of belonging should begin before a student applies. Institutions can take proactive steps to make these changes by ensuring the accessibility office is easy to locate on the website; advertising affinity groups and clubs; and promoting the institution's commitment to accessible tools, services, events, and other services that might be helpful. Institutions should make prospective students with disabilities feel not only welcomed and valued, but also wanted both on-campus and in online programs.

Once a student enrolls, belonging becomes fundamental to their overall experience and ability to graduate. Belonging permeates everything from students being able to easily access academic accommodations (especially if their accommodation requirements change over time) to finding a community of peers. Without these systems in place, students are more likely to seek other programs, or simply leave higher education. For example, a recent SNHU graduate, Jereme West, an Army veteran living with post-traumatic stress disorder (PTSD), attended seven other schools before finding what he needed to belong and attain his degree at SNHU (CHEPP, 2023). Jereme's multiple transfers demonstrate his own commitment to finding a sense of belonging, and his ultimate graduation demonstrates SNHU's commitment to making all students feel valued and supported.

CHEPP will explore the importance of belonging in depth in its forthcoming third paper, as part of the online by design series.

The Need for More Data and Research to Inform Learner-Centered Policy and Practice for Learners with Disabilities

The true scope of the disconnect between how learners with disabilities access and complete higher education is unknown due to a lack of data and research. Despite one in four Americans having a disability (Centers for Disease Control and Prevention, 2023), a significant body of data and research on higher education learners with disabilities, particularly in online environments, does not exist. Although there is a clear picture of how students with disabilities are served through K-12 education and data on participation of workers who self-identify as disabled in the workforce, institutions of higher education are not required to report disaggregated enrollment data on students with disabilities alongside other subgroups of students. The statistic most relied on to inform policymakers and the field on the prevalence of disability in higher education is from an NCES sample survey showing 21 percent of undergraduate students and 11 percent of graduate students as having a disability (NCES, 2023).

While it is understood that data on disability in institutions of higher education will be reported differently from its reporting in K-12 settings, as students will need to self-identify in college rather than educators reporting on their disability status, current data is lacking, and significant undercounting is likely. For example, colleges are required to report the percentage of their students receiving accommodations through their accessibility office, but this is an incomplete measure, with many learners who have a disability not seeking accommodations for a number of reasons including stigma, approval barriers, and/or lack of knowledge of the accommodations available. Improving data systems in higher education for students with disabilities is critically important in driving research and informing practitioners. More inclusive data will help identify the most effective approaches to scaling accessible design and accommodations delivery, as well as informing faculty and staff training and instructional approaches. Data improvement aside, there are several areas where higher education systems can improve to better serve learners with disabilities.

Learner-Centered Design: Enhancing Access to Higher Education for Learners with Disabilities

Fundamental to learner-centered operations is the understanding that students enroll in higher education programs with varying skills and abilities. While students have a responsibility to advocate for themselves in an academic setting, institutions should provide equitable access to student support services. Learner-centered online programs have a critical role to play in offering students with disabilities a rewarding and successful higher education experience. According to a study conducted by the *Journal of Diversity in Higher Education*, students with disabilities expressed a preference for online programs. These students reported experiencing greater rates of discrimination and stigmatization due to their disabilities in traditional settings. Through their online programming, these students felt a level of protection as well as a sense of ownership and control over their learning processes that they were not able to gain in person (Verdinelli & Kutner, 2016).

To construct a productive learning environment that is conducive to students' varying disabilities, institutions must dedicate time and resources to researching best practices; implement and utilize up to date, accessible technology platforms that meet the needs of students with disabilities; and prioritize outreach to students around available support systems. Disability services, often called accessibility offices, should have clear communication systems to ensure that students can resolve issues or request additional support when needed. Additionally, having a set of commonly offered, easily accessed, standardized accommodations, such as extra time on assessments and closed captioning on recorded lectures, benefits students and faculty in navigating what can be a confusing process for students trying to receive the accommodations they need to fully access their courses.

Key Elements of Accessible Education

Through interviews with practitioners, students, and advocates, and the limited research available on this topic, we identified key elements to accessible higher education, including programs delivered online:

· Transparent availability of resources and access to disability office

· Universal Design for Learning (UDL) principles applied throughout course and program design and delivery

· Centralized systems and consistent use of technology across courses and departments

· Feedback channels and continuous improvement processes

· Accessibility committee and governance policies

· Regular engagement of faculty and student services professionals

This list serves as a starting point to determine areas of focus and improvement when working toward fully accessible learning.

Transparent Availability of Resources and Access to Disability Office

Navigating college for students with disabilities can be overwhelming, but many institutions of higher education have an office of disability services or office of accessibility to support students. These offices should be the "front door" to all accommodations and access for the college. Model offices engage in proactive outreach prior to students beginning with their first course, make connections between students and faculty when needed to remove barriers in navigating access to accommodations, and help train staff on disability inclusion. Unfortunately, some students with disabilities do not reach out to their institution's office of disability services simply because they do not know it exists or how best to contact them, as this model is the exception. With students only receiving accommodations after they register their disability with their institution, easy access to, and timely response from, disability offices is essential to student persistence and success. Disability offices can be proactive in reaching students by periodically emailing all students with the resources available, putting disability services contact information in an easily accessible place on the institution website or including it on admissions letters, and training advisors to recognize and proactively reach out to learners who use words that indicate disability status (e.g., "anxiety," "diabetes," "PTSD") and may qualify for accommodations. Faculty and staff should also be aware of these resources and know how to share them with students.

UDL Principles Applied Throughout Course and Program Design and Delivery

Utilizing the UDL framework (CAST, n.d.) creates more accessible higher education opportunities for all learners. UDL embraces the principle that all people learn differently and therefore should have options that work best for them, such as being able to read or listen to an assignment. There is also more than one way to measure learning, such as students having the option to complete an assessment or paper to demonstrate their mastery of a topic. Fully implementing UDL is the gold standard for accessibility practices because it greatly reduces the need for additional accommodations because all learners, including learners with disabilities, have access to the learning modalities that work best for them. As institutions work toward fully implementing UDL, there are practices that bolster accessibility, such as closed captioning and description capability for all videos and other presentations; built-in screen readers and voice-to-text; time flexibility for all assignments and assessments; and providing more than one option to demonstrate learning throughout courses.

Sidebox 5: UDL in Practice
During the practitioner interviews conducted to inform this paper, CHEPP uncovered a story about how one professor offers students multiple ways to complete assessments based on their strengths. For example, his students have the option to take an untimed exam (with a word limit) or turn in a research paper for their final assignment. He also provides extra time to complete assignments, a strategy he believes helps not only students with disabilities but also those whose learning style requires more processing time or for whom English is a second language. He makes himself available to provide comments on assignments prior to their due date and ensures students understand exactly what assignments are on the horizon far ahead of time so that they can make additional arrangements for accommodations, if necessary. In short, this professor focuses on learner-centered design for all of his classes because he strongly believes that doing so "raises all boats" and translates to an equitable academic experience.

Centralized Systems and Consistent Use of Technology Across Courses and Departments

Important to a consistent student experience, particularly in online environments, is implementation of a single platform where students can access their classes and course materials, submit assignments, and communicate with faculty and support staff. The platform must be easily navigable and accommodating to those of varying needs and abilities. For any technology provided by an external contractor, institutions should work through their request for proposal (RFP) processes to stipulate accessibility criteria and ask questions about what processes are in place to update systems for accessibility purposes when needed.

Consistent use of this technology across courses and programs is also important. For example, if one department uses a different platform to facilitate courses, students are forced to learn a new system that may not have the same accessibility standards, disproportionately impacting students with disabilities' access to those courses. Shifting technology to a single platform in an online learning environment requires that institutions offer professional development to faculty and staff to ensure that all are well-versed in its functions. Institutions must also invest in training students to use their chosen platform. This includes giving students a clear understanding of how to contact accessibility services, where to access their accommodations, and how to get help when they need it.

Sidebox 6: Heather's Story

At 48, Heather graduated from SNHU with her BA in human services, alongside her service dog Asher. Heather is visually impaired and relies on public transportation. After trying college in person, she eventually enrolled online because she didn't have to worry about navigating a physical campus or transportation barriers. She also needed a program that would work with her schedule, which included balancing a full-time job at an independent living center. During her studies, she encountered several hurdles when attempting to access needed accommodations. She remembers having to withdraw from two math labs because they were "completely inaccessible." She recalls that it was difficult to navigate the process to change courses due to hardship, without it being counted as a traditional course withdrawal and negatively impacting her GPA. She noted that at times her classes would require texts that were not in accessible formats and had to be exported/converted into new formats – and that extra process delayed her progress in class. She said, "Sometimes I didn't know until I got into a class whether it was accessible or not. But once I was in the course, it was too late to change my mind."

Inconsistent learner-centered design required Heather to advocate for herself to stay on pace in some of her courses. UDL course design and materials would have avoided these obstacles and given Heather a more equitable learning experience.

Feedback Channel and Continuous Improvement Processes

Accommodations are not static as students' needs may change throughout their postsecondary programs. In addition, available accommodations should be consistently monitored and updated, particularly with emerging technology, to best serve students. To respond to these evolving student needs and accommodation offerings, institutions must implement a robust feedback channel that students, faculty, and staff may access, which can be done through a variety of formats, including:

- Scheduling regular check-ins with students registered with the disability office

- Issuing regular surveys to students about their accommodations and any improvements or changes they require

- Engaging with faculty and staff about how accommodations are working to help inform any needed improvements

- Evaluating student persistence and success metrics

Accessibility Committee and Governance

To maintain a well-functioning disability services system, it is important to have an oversight committee that meets on a regular basis to evaluate ADA and 504 compliance, receive feedback, and ensure students' needs are being met. Oversight committees may take on different forms depending on the institution's capacity and structure. Some institutions may contract with a third party, while others may appoint a group of individuals representing different departments, including the student perspective, and offices across the institution. In addition, internal policies that require, support, and encourage the most accessible operations are critical for the successful inclusion of students with disabilities (Tokar, 2023). These actions may simply ensure compliance or take initial steps to move beyond meeting the ADA and 504 requirements to true inclusion.

An accessibility committee can draw attention to gaps in disability services and propose solutions. One university we interviewed for this paper has a staff of just two who serve approximately 1,000 students. They created an accessibility committee to support their office bandwidth by helping to identify areas where accommodations may be implemented or systems accessibility may be enhanced. The committee has established an initial goal of integrating guided notes into all courses to help students with traumatic brain injuries. With a strong military connection, the institution serves a comparatively high number of students with these types of disabilities. Therefore, it standardizes guided notes rather than relying on students to register with the Student Accessibility Services. This practice benefits both the small accessibility services office and, of course, the students who require this accommodation.

Regular Engagement of Faculty and Student Services Professionals

Faculty, as the group that interacts with students most frequently, must be proactive and responsive to students' accessibility needs. Faculty members' understanding of students' varying needs, and ability to adapt courses to meet them, is crucial to students' success and belonging. Laying the groundwork for this level of support requires proactive steps like assessing syllabi, ensuring that materials are accessible, creating more holistic accessibility statements (rather than merely conveying the institution's legal obligations), and, in collaboration with students, creating community guidelines for the class (Field, 2023). In online programs, with little support or guidance, faculty often have to take extra steps to form personal connections with learners to achieve more inclusive in-class environments.

Conclusion

Higher education should be accessible to learners with disabilities across institutions, programs, and delivery modalities, including online. While accessible systems and comprehensive accommodations do not guarantee success for students with disabilities, they help ensure that all students are able to move through their postsecondary education programs on a level playing field. As more students seek flexible higher education modalities and enroll online, institutions need to be examining accessibility across all academic and non-academic curricula, platforms, and services. To provide students with disabilities an equitable experience, institutions of higher education should work to incorporate the key elements of accessible education outlined in this paper.

The significant gaps in research and available data on students with disabilities, as well as the overwhelming number of institutions that fail to meet the legal standards outlined in Section 504 and ADA, illustrate the systemic exclusion of these students from higher education. As institutions work to bolster accessibility and accommodations practices, policymakers can help address these issues at the federal level, including by improving data reporting and supporting more inclusive practices across higher education.

Policy Recommendations

Online by Design: How Accessibility Is Fundamental to Learner-Centered Design unpacks barriers that limit opportunities for learners with disabilities to enter, continue, and excel in higher education. These barriers focus broadly on the burden of proof and the need for accommodation being placed on learners, the lack of belonging that exists across systems, the lack of available data on learners with disabilities, and the challenge of true inclusion and, relatedly, persistence and degree completion. Learner-centered design offers an opportunity to focus accessibility and inclusion at the forefront of the higher education experience, and the paper outlines key elements of a more accessible education.

To create inclusive and accessible institutions of higher education for learners with disabilities, policy changes at multiple levels of higher education are needed. These policies range from institutional and practitioner policies that can be implemented in the short term to other organizational policies that will require significant cultural and system-wide shifts. There are also policy changes needed at the federal level – from guidance that would set a roadmap to ideal regulatory changes and updates to federal laws for meaningful and lasting change.

The following recommendations are structured around CHEPP's learner-centered design framework [Figure 1]. The framework provides context for why the policy changes are ultimately necessary: to support the learner and their journey toward economic safety and mobility. The various actors and their roles in the policies impact the learner experience and how likely a learner with a disability is to succeed. To make higher education more accessible and inclusive for learners with disabilities, swift and decisive action must be taken, beginning with the following recommendations.

Mission & Culture

Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Adopt an overarching vision or mission statement that commits to, and has clear goals aligned to, having fully inclusive and accessible systems for learners with disabilities.

- Support and utilize human capital policies that reflect clear expectations aligned to prioritizing serving learners with disabilities, including through inclusive hiring and management policies for faculty and staff.

- Provide adequate staffing resources to fully execute accessibility systems, including appropriately staffing accessibility offices, ensuring accessible technology expertise, and having a well-trained compliance team.

- Establish a governing body dedicated to ensuring full compliance with Title III of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

- Provide and plan for accessibility and accommodations through a centralized budget process, such as an institution's general fund, to ensure more consistent and equitable access to accommodations and assistive technology across programs and systems.

- Evaluate internal request for proposal (RFP) processes for accessibility and, through this evaluation, implement new procurement policies that require meeting standards of accessibility, and apply this evaluation and policies to all contracting and purchasing of equipment system wide.

- Apply a continuous improvement mindset to accessibility for learners with disabilities by using, and acting on, existing data and developing and utilizing leading indicators on persistence and success to identify gaps and better support learners, as well as inform policies and practices across the institution.

Federal Policy Recommendations

- The Department of Education, through regulatory or congressionally directed action, should collect and track comprehensive, longitudinal data on students and learners with disabilities in higher education to inform future policy decisions related to their ability to access and succeed in college. Such data should be used to surface persistence and completion increases linked to best practices and accessibility efforts.

- Accreditors should require institutions to meet accessibility standards and use data to inform how programs and institutions are evaluated during their review process to drive a continuous improvement approach.

- Congress should establish an office of postsecondary access within the Office of Special Education and Rehabilitation Services. Responsibilities should include ensuring that data from institutions regarding graduation rates, degree completion, access, and accommodations is made public to students to ensure effective and responsible decision-making in selecting institutions to attend (e.g., College Scorecard data).

Academic Relevance & Engagement

Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Evaluate internal hiring, training, and education for faculty and staff to ensure that disability and accessibility training is embedded to create more accessible and inclusive coursework, and that the trainings and educational opportunities include system-wide adoption of Universal Design for Learning (UDL) as a core instructional practice.

- Develop internal accessibility assessment processes to test, review, evaluate, and improve accessibility across all colleges, programs, labs, and specialized settings.

Federal Policy Recommendations

- The Department of Education should release guidance through the Rehabilitation Act Section 504 to support best practices that empower students with disabilities in their transition planning from K-12 systems into postsecondary education. Such guidance may be in coordination with the Department of Justice and the requirements of institutions under the ADA.

- Congress should require institutions to accept certain documentation as evidence of a disability, including individualized education programs (IEPs) (e.g., such as outlined in the RISE Act (Respond, Innovate, Succeed, and Empower Act)).

- Specialized accreditors should be aware of and review programs on the application of specialized accessibility tools that allow learners with disabilities to fully participate in the relevant program of study (e.g., science lab accessibility needs in a biology program).

- Congress and the Administration, in all efforts related to artificial intelligence (AI), should ensure that algorithmic bias against people with disabilities is addressed and guardrails are in place. As new tools are developed, best practices in the use of AI should be shared as AI can and will continue to be an accommodations tool for learners with disabilities.

Learner Agency & Awareness

Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Offer multimodal education program delivery, such as on-campus, hybrid, and online, allowing for student choice and support within each type of program delivery.

- Prioritize flexible use of time, such as competency-based education, which replaces seat time, credit hours, and grades as the measures of student progress and completion with measurement of their demonstrated knowledge and skills.

- Develop and implement institution or system-wide policy to consistently accept certain documentation from learners as evidence of a disability, including IEPs, 504 plans, and other such documentation, and communicate clearly with incoming, current, and potential learners.

Federal Policy Recommendations

- The Department of Education should develop guidance in the closed school and program process and require accessibility plans and coordination for students with disabilities transferring or participating in a teach-out agreement.

- Congress should ensure that students with disabilities who receive accommodations for their pace of study are eligible for Title IV financial aid grants aligned with their academic pacing (e.g., such as proposed by the Pell Grant Flexibility Act and the Higher Education Grant Flexibility Act).

- Congress should allow institutions to test and learn how to distribute Title IV financial aid for learning based on knowledge and subject mastery in lieu of time using the credit or clock hour (e.g., such as proposed in the Empowering Learners Through Competency-Based Education Act).

- Congress should create monetary incentives or rewards for institutions of higher education that excel at meeting the needs of students with disabilities regarding accommodations and accessibility in an accountable and measured way and for institutions that commit to continuing to do such work.

Student Experience

Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Develop, evaluate, and invest in a robust office of disability support or office of accessibility to centralize accommodations across the systems and provide proactive outreach to students. The office should be adequately staffed and funded based on the size of the institution of higher education and should collaborate with other diversity offices within the institution of higher education to ensure that students receive support across the continuum of their needs and not in silos. Policies within and across offices should be evaluated and outreach coordinated.

- Develop and disseminate inclusive policies across the institution to require and promote accessibility, inclusion, and belonging in all spaces: these should include providing sample language for all programs to use in materials, for consistency, and developing and explaining accommodations that are available to all students prior to requests, which may include extra time on tests, part-time flexibility, and additional options pre-established by each institution.

- Create programs and activities that enhance belonging, such as by including accommodations and access information in orientation and welcome activities, developing peer ambassadors, and collaborating with other diversity efforts.

- Use data to continuously improve available accommodations based on student success, including assessing and evaluating emerging best practices to support learners with mental health disabilities, such as leaves of absence and other forms of release time.

Federal Policy Recommendations

- Congress should require institutions of higher education to have an office of accessibility. In addition, they should develop a pilot program that provides institutions funding to expand their accessibility and disability services, including accessible technology, a broadened range of accommodations, additional staff, and alterations to physical spaces through centralization of budgeting and prioritization of accessibility budgets within the institution of higher education.

- The Department of Education, through the Institute of Education Sciences, should develop a clearinghouse for evidence-based best practices in accessibility and accommodations in higher education, conducting research on the impact of different accommodations on learner success and hosting activities to highlight institutions that excel at implementation.

- The Department of Education must issue regulations under the Rehabilitation Act's Section 504 regarding the obligations of institutions of higher education's obligations to be accessible and provide accommodations to students with disabilities in higher education.

- The Department of Justice should build on recent action improving web access at public institutions by issuing regulations under Title II of the ADA that require private institutions to make online content accessible to people with disabilities.

Acknowledgments

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