

**REPORT OF THE PROVOST'S AD HOC ADVISORY COMMITTEE ON DISABILITY
SERVICES FOR UNDERGRADUATES**

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Table of Contents

Executive Summary

- I. The Committee's Charge
- II. The Committee's Process
- III. Current Practices
 - A. Office for Disability Services (ODS) Roles and Procedures
 - B. Current Documentation Review Practices
 - C. Principles Guiding Determination of Accommodations
 - D. Assessment of the Institutional Climate
- IV. Key Observations and Findings
 - A. Evaluation of the Development of ODS
 - B. Evaluation of the University's Policies
 - C. Evaluation of the Institutional Climate
 - D. Challenges Identified by Committee
 - 1. Defining the Task of Granting Accommodations
 - 2. Transition to Postsecondary Education
 - 3. Variability of Documentation
 - 4. Impact of Academic Requirements on the Range of Appropriate Accommodations
 - 5. Intensity of Challenges to University Decisions
- V. Recommendations
 - A. Related to Policy
 - B. Related to Procedure
 - C. Related to Communication Efforts
 - D. Resource Needs and Recommendations for Further Review
- VI. Appendix

EXECUTIVE SUMMARY

The Ad Hoc Advisory Committee on Student Disability Services at Princeton spent several months working in response to its charge from the Provost to: assess the progress made by the Office for Disability Services (ODS), ensure that University policies and procedures regarding accommodations are consistent with best practices as well as the law, provide advice to the administration about additional challenges or concerns, and develop recommendations for improving the delivery of services as well as the culture of the University. This report summarizes the Committee's understanding of the most important issues in this area, which tend to be complex and multi-faceted, and provides a set of ideas that will strengthen the good work being accomplished by ODS.

Princeton's commitment to ensuring that students with disabilities have access to the full range of academic programs requires an individualized and interactive process to identify the reasonable modifications that do not fundamentally alter an educational task or assessment. Importantly, the Committee's review confirmed that most students with disabilities who request accommodations at Princeton are well-served by the current Office of Disability Services and are able to participate in all of the educational opportunities offered by the University. However, it was equally clear to the Committee that the task of determining reasonable academic accommodations has been growing increasingly complex over the first four years of ODS's existence and that trend seems likely to continue, both for students with learning disabilities and for those with psychological disabilities. Over the course of the semester, the Committee has determined that, for the individualized and interactive process to work well, the staff of ODS needs thorough and accurate documentation, prepared and reviewed by highly-qualified evaluators familiar with the particular obligations and expectations of rigorous institutions of higher education.

The Committee further determined that it would be useful to institute clearer, earlier and more frequent communications regarding Princeton's policies and processes for granting academic accommodations. In addition, the Committee recommends that additional efforts should be made to enhance community awareness of issues relating to disabilities and to promote a climate that is increasingly welcoming and inclusive. The Committee offers a number of specific recommendations, intended to strengthen or enhance the University's achievement of its goal of providing an inclusive, accessible, and equitable campus.

As can be seen, our recommendations are grounded in the consultative approach and one that advocates for shared responsibility in implementing disability services of the highest quality. The recommendations include revisions to University policies and ODS procedures, as well as strategies for improving communications among the various segments of the University community and between key players (i.e. faculty and staff). The communication

recommendations are aimed at enhancing the institutional culture and addressing some of the issues the Committee identified that may work together to discourage certain students from seeking accommodations.

This report outlines an approach to enhancing services, communications and the University's communal culture in the future, guided by the following overarching goals, reflecting not only our legal obligations but our institutional values:

- Maintain a set of policies and procedures that are consistent with the law and the higher education community;
- Provide clear, timely and complete information to key constituents, including students (prospective, admitted, and enrolled), their parents, faculty, and selected administrators;
- Implement policies and procedures that minimize unintended consequences such as inequities, inconsistencies, or role conflict;
- Expand the support and resources available to the ODS staff tasked with implementing Princeton's policies
- Educate the broader University community about what disability services are and what they are not;
- Increase awareness of Princeton's commitment to provide equal access to academic programs and to facilitate a climate of inclusive excellence.

The members of the Committee wish to express their appreciation for the many students, faculty and staff who took time to share their views with the Committee, provide information, articles, and personal experiences, and make suggestions for enhancements to Princeton's existing services. We are grateful for the candor and detail of the feedback and input we received. We also wish to express our gratitude for the time of staff in the offices of the Provost, Disability Services and the General Counsel.

I. THE COMMITTEE'S CHARGE

The Provost charged the Ad Hoc Advisory Committee on Disability Services for Undergraduates to review a number of issues, ranging from the standard used for determining whether a student receives academic accommodations, to whether the communication networks among key constituents are effective. When the University created the Office for Disability Services (ODS) five years ago, the two primary reasons were to centralize review of requests for academic accommodations, which had previously been handled in various offices, and to offer additional resources and facilitation to students.

The Committee's review was prompted by 1) the increasing complexity of providing accommodations, particularly for students with learning disabilities, in an academically rigorous, postsecondary setting, 2) questions from a few community members about whether the disability resources are adequate, and also 3) questions from a few community members about the appropriateness and fairness of some accommodations. As may be the case with services supporting an increasing and complex population, the University has received information from key administrators that there is room to improve our effectiveness and responsiveness in addressing requests for accommodations.

The five key questions posed by the charge were as follows:

- Is ODS/the University using appropriate criteria to determine whether to grant or deny request for accommodations related to the undergraduate academic curriculum?
- Is the University providing an appropriate range of accommodations to students with disabilities?
- Does the University have an appropriate process and timeline for reviewing the documentation that students submit to support their accommodation requests?
- Does the University have in place an appropriate and effective appeals process for handling informal and formal appeals of ODS decisions?
- Has the University constructed effective and efficient communication networks between ODS and other offices and academic departments?

The Committee gathered information and identified best practices through a consultative process. In an effort to assess Princeton's current functioning and current challenges, the Committee: met with psycho-educational experts; invited faculty, student and relevant staff responses to a questionnaire created by the Committee; and reviewed information about practices at similar institutions across the country. This Report, composed of five sections, is a distillation of the Committee's collective learning and responses to the charge, although it is not organized around these questions but rather around the three major themes of policies, procedures, and

climate that were most salient in our review. After this brief introduction, Section II provides an overview of the work of the Committee, with descriptions of the information gathered and the individuals who met with and provided information to the Committee. Section III outlines the University's current practices, as understood by the Committee, including the procedures for reviewing documentation and principles that guide determinations regarding accommodations. Section IV articulates the Committee's key observations and conclusions, including the challenges identified by the Committee. Those challenges form the basis of the recommendations, which are outlined in Section V.

Although the review focused on the needs of undergraduate students, the observations and recommendations of the Committee will likely resonate for other parts of our community. Increased access and demand for services, the competitive nature of access to an Ivy League education, revisions to the legal framework, and an evolving climate combine to create a scenario where there is an immediate need to enhance capacity and improve communication. The Committee is optimistic that the recommendations are useful and that they will be given the fullest consideration.

II. THE COMMITTEE'S PROCESS

From September through most of January, the Committee met weekly to identify a plan of action, review relevant material, meet with experts and evaluate the data available to them. At the outset, the Committee identified sources of information that it believed would be helpful and established mechanisms to gather that information. The Committee determined early on that there was a need to understand the legal landscape, institutional concerns and the policies and procedures of the Office for Disability Services.

The complexity of the field of evaluating and implementing academic accommodations for students with disabilities at an academically rigorous institution such as Princeton is evident from the extent of information gathering performed by the Committee. Providing academic accommodations is a task that is framed by and must function within a legal context which both prohibits discrimination on the basis of disability and requires that reasonable accommodations be provided to students with disabilities.

Provost Eisgruber met with the Committee at the outset to emphasize the importance of the questions posed to it. University General Counsel Peter McDonough met with the chair of the Committee in September, and University Counsel Hannah Ross sat with the Committee in an advisory capacity. The Director of ODS, Eve Woodman Tominey, was given time to present data regarding the population served by ODS and to describe the policies, principles and procedures for reviewing requests for accommodations as well as her experience over four years

of service in the role of Director. Ms. Tominey also shared peer comparison data on types of accommodations available, grievance procedures, application of the “normal range” standard (as described more fully below) and the time period for reviewing documentation.

Committee member Claire Fowler, senior associate dean of the college, shared her office’s role in communicating with the faculty regarding the accommodation process. The Office of the Dean of the College (ODOC) implements the faculty-approved academic policies governing the educational requirements for undergraduates and, prior to the creation of ODS, administered the accommodations process. ODOC has responsibility for articulating the academic requirements of a Princeton education and for communicating annually to faculty their obligations to provide approved accommodations for students with disabilities.

Given that students with learning disabilities make up the largest proportion of ODS’s population, the Committee spent a considerable amount of time working through the nuances of how learning disabilities are diagnosed and documented, including various models used to evaluate when a person has a substantial functional limitation. The Committee also obtained information from professionals in the fields of diagnosing, evaluating, treating and accommodating students with disabilities. Several hours were spent with Mark S. Greenberg, Ph.D., a clinical neuropsychologist specializing in the diagnostic assessment and treatment of a range of medical, neurological and psychiatric conditions in adolescents and adults. Dr. Greenberg has extensive experience with adults and college students with suspected learning and attention disorders, and teaches at Harvard Medical School. He also consults with several educational institutions and testing agencies on issues related to the documentation of disabilities.

The Committee also met with Dr. Loring Brinckerhoff, Director of the Office of Disability Policy at the Educational Testing Service (ETS) and a consultant to Harvard Medical School and Columbia University. He discussed the markers that ETS often focuses on in documentation for determining accommodations on what is commonly referred to as their “high-stakes” tests.

Committee members were provided with several scholarly research articles and resources regarding learning disabilities specifically, as well as materials related to the broader questions of academic accommodations for students with disabilities. A bibliography is provided as Appendix A to this Report.

In order to reach a large group of constituents in a short amount of time, the Committee devised several questionnaires that were administered online. All students (undergraduate and graduate) and faculty were encouraged to complete the questionnaires. Because the Committee wanted to understand ODS’ collaboration with other offices and administrators, there was a

questionnaire distributed to the following: deans and administrators from ODOC and related offices, the residential colleges, the offices of financial aid, the dean of undergraduate students, the registrar, Health Services, Athletics and Admissions, as well as, undergraduate departmental contacts, directors of graduate studies, graduate program administrators and the ODOC deans and offices. The University's Office of Institutional Research administered the survey. The questionnaire was available November 18th through December 6th. On November 29th, a reminder was sent out and an ad appeared in the Daily Princetonian.

The questionnaire allowed the Committee to gather feedback and solicit recommendations regarding the range and quality of services being offered to support students with disabilities. Participants were asked to report on their experiences, observations, perceptions and degree of knowledge of current institutional principles, policies, and processes for accommodating students with disabilities. The data collected informed the Committee's efforts to understand actual experiences, identify the level of need for more information on specific topics and practices, assess the appropriateness and effectiveness of accommodations and examine the University's efforts to foster an inclusive, accessible campus environment. In instances where individuals contacted a member of the Committee (whether or not the individual was among the questionnaire respondents), the individual was offered an opportunity to share their views in writing in a statement of up to 1000 words.

The Committee also consulted with the Offices of Athletics and Admissions to better understand the impact of Princeton's disability processes, policies and communication efforts on prospective students. In particular, the Committee wanted to understand the recruitment and admission timelines and the practices regarding likely letters. In addition, John Kolligian, Director of University Health Services, and Eve Woodman Tominey were asked to prepare a presentation describing the process of accommodating students with psychological disabilities. A limited high-level overview led the Committee to conclude that the complexities of this area merit its own review. (See Section V. D. for recommendations for further review.)

III. CURRENT PRACTICES

A. Overview of the Office for Disability Services' Roles and Procedures

ODS was created primarily to centralize review of requests for academic accommodations and offer additional resources and facilitation to students. With the establishment of ODS, however, Princeton wanted to provide not only direct services to individuals with disabilities but also to accomplish broader goals related to creating an environment that is welcoming and inclusive. ODS therefore also exists to raise awareness of and communicate expectations regarding our commitment to welcome students with disabilities.

ODS is also tasked with broadly conveying that the institutional approach to granting accommodations does not require lowering academic expectations or waiving the fulfillment of the essential elements of a Princeton education. Through training and workshop opportunities, ODS also encourages the notion that all students, faculty and staff can participate actively in making their campus culture one that is inclusive, diverse, and collaborative.

The Office is staffed with a full-time Director for Disability Services and one full-time Disability Services Coordinator. Approximately 200 undergraduate and graduate students have contact with the University's Office of Disability Services over the course of a year, with approximately 100 students receiving some form of academic accommodation. To receive accommodations, a student must provide ODS with documentation that substantiates the need for such services in compliance with Section 504 of the Rehabilitation Act, the American with Disabilities Act, as amended, and the New Jersey Law Against Discrimination. (The process of determining reasonable accommodations is described more fully below.)

Accommodations facilitated by ODS may include electronic text, interpreters, adaptive materials and equipment, assistance with note taking, laboratory assistance, and test accommodations. ODS also offers individualized support services using and teaching a variety of learning and organizational strategies and works with many students each year to help them develop improved study and work techniques. For example, among the resources ODS offers are: teaching various types of reading/study strategies (two examples are those known as "SQ3R" and "Cornell Notes"), use of electronic text, screen reading and/or voice-activated software, tools such as semester/weekly/daily calendars, and worry pads. ODS does not arrange content tutoring. The University does not provide or pay for transportation services or personal attendant care.

Students with disabilities are expected to self-identify and request accommodations in the post-secondary environment. Entering students receive a "Disabilities and Other Special Needs" form in their package of materials for matriculation with which to request accommodations, and ODS provides forms on its website for students who choose to self-identify at any other point in their time at Princeton. Students requesting accommodation are expected to submit documentation from qualified professionals establishing that the student has a substantial functional limitation due to a physical or mental impairment and requires accommodations in order to access educational opportunities. ODS staff review the documentation and make an initial determination of whether the requested accommodations are necessary and/or reasonable. ODS conducts an intake interview with the student at a time when the student is on campus.

If the requested accommodations are necessary and reasonable based on the complete and appropriate documentation, ODS ordinarily authorizes the accommodations and offers any supporting services that may be helpful to the student. Students sign an Acceptance of Services

agreement and complete a Course Roster form on which they identify courses and professors to be notified of approved academic accommodations.

If ODS's initial review indicates that some or all of requested accommodations are not well-supported by the documentation submitted, or that additional review is needed in order to make a determination, ODS sends the documentation to an independent consultant with experience on the relevant issues. The outside consultant reviews the documentation and discusses findings and recommendations with ODS in order to collaboratively determine eligibility for and type of reasonable accommodations. The Director then notifies the student of ODS's decision and, if applicable, works with the student to facilitate implementation of accommodations.

Students who wish to dispute the decision of ODS regarding a request for accommodation may utilize an informal resolution process, described in brochures and on the ODS website, whereby they seek reconsideration of the decision from the Director of ODS. The Director may utilize an independent consultant, as a second or third opinion, in her reconsideration, and will consider any additional information provided by the student. The Director will notify the student of her decision.

In limited circumstances, a student wishing to dispute the outcome of the informal resolution process may file a formal complaint with the Vice Provost for Institutional Equity & Diversity in the Office of the Provost. The Vice Provost will make every effort to resolve the complaint within 60 days and will issue a final decision in writing.

B. Current Documentation Review Practices

Students requesting accommodation are expected to submit documentation from a qualified professional establishing that the student has a substantial functional limitation due to a physical or mental impairment and requires accommodations in order to access educational opportunities. Students seeking accommodations for a diagnosed learning disorder ordinarily undergo psycho-educational testing, a series of tests administered over two or three days. The battery of psycho-educational tests can measure a variety of types of intellectual strengths and functions with varying specificity, depending on which tests are used and how they are administered. Documentation of learning disabilities typically includes a written evaluation, created by a psychologist or other professional, which analyzes the results of psycho-educational testing.

Psycho-educational assessments are generally designed to measure both aptitude – the raw strength of the person's intelligence – and "achievement" or specific intellectual functions, such as reading, writing and math fluency. Psycho-educational tests are usually normed to the U.S. adult population and reflect that there is a range of "normal" scores or average scores,

which one might picture as a classic bell curve. The bell curve reflects the area where most people fall with fewer people scoring at the extreme ends of the spectrum. Most individuals have significant variation along the curve (*i.e.*, they do not score the same on all tests), showing their relative strengths and weaknesses, such as being strong in math skills and reasoning but having relatively weaker reading skills. Variation is normal; our brains and skills are not all exactly the same. Hence, the range of “average” or “normal” scores on psycho-educational tests is fairly wide.

ODS reviews the documentation submitted by a student, which includes an evaluation or assessment provided by the student’s chosen provider or consultant. ODS utilizes what some call a “hybrid” or holistic approach when determining whether a student requires accommodations, looking at test results, academic history, clinical observations and personal narratives by the student, among other things. When reviewing psycho-educational assessments submitted to support a student’s request for an academic accommodation due to an alleged learning disorder, ODS looks for a disorder-based, material deficit in the intellectual functions compared to most people, meaning a pattern of scores meaningfully below the normal range on key aptitude and/or achievement measures. Where such a deficit exists, the student may need reasonable accommodations in order to access Princeton’s educational programs. Where no such deficit exists, the student’s intellectual functioning – typically shown by the “achievement” scores – is strong enough to allow him or her to access educational programs without accommodations. The Committee noted that peer institutions also rely on viewing the student in comparison to most people and requiring a deficit, rather than utilizing standards based on an intra-individual discrepancy.

It has been ODS’ experience, as well as the experience of our peer institutions, graduate schools, and testing agencies such as ETS, that the quality of the documentation submitted in support of a request for accommodations varies greatly. There is no single “industry standard” for such evaluations; a number of professionals may produce them, and expectations about the content vary as well. Therefore, some assessments and written reports will be more credible and persuasive, while others will be less so; this underscores why the soundness of the review process depends heavily on the experience and expertise of reviewers. .

C. Principles Guiding the Determination of Accommodations

Several core principles guide current determinations regarding academic accommodations, and the Committee considered whether any of these were inconsistent with Princeton’s values and goals, or were in need of revision. The Committee concluded that these principles continue to support Princeton’s pedagogical goals and values and should continue to guide the accommodations determinations of the University. First and most fundamentally, Princeton is committed to the principle that a Princeton education is academically challenging

for all students. A related principle is that the essential academic requirements that are characteristic of the Princeton education must be satisfied. Therefore, the University does not alter the essential elements of its educational programs, and does not waive generally applicable requirements which embody those educational elements.¹ Accommodation of individuals with disabilities does not mean that academic expectations should be lowered and therefore, reasonable accommodations are those that can be accomplished without fundamental alteration of academic requirements or waiving essential requirements.

Second, it is the case at Princeton that individual faculty are in the best position to determine the essential elements of the courses they teach. Faculty members are best able to determine when a proposed modification will alter an essential educational task in their course or undermine the integrity of the academic assessment. ODS works with faculty members as well as the Office of the Dean of the College to determine reasonable accommodations. It is of utmost importance that affected faculty members are fully engaged in consultative interactions with ODS and that they are aware of the full range of adjustments that can be made to the time, place and manner in which course requirements may be completed.

Third, individualized determinations of requests for academic accommodations, based on the facts of a specific case, require procedures that allow for flexibility, creativity and adaptability, while remaining attentive to precedent and procedural fairness. The University therefore relies on the good judgment and knowledge of Princeton administrators and consultants to strike the right balance between individualized consideration and flexibility, on the one hand, and attentiveness to equity and consistency, on the other hand. Having clear and transparent expectations for documenting functional limitations, as well as the current impact of those limitations, is at the heart of this enterprise. Moreover, having resources to evaluate requests and respond in a timely, thorough and sensitive manner is crucial.

D. Assessment of the Institutional Climate

In the fall of 2002, the Undergraduate Disabilities Issues Committee (UDIC) of the USG was created. Their stated mission was to challenge the University to improve its relationship with the members of the campus community who have disabilities. The UDIC submitted a report to the Vice President of Campus Life recommending that the University promote disability awareness for the campus and offer training on disability issues for members of the student residential staff. The institutional response to this report led to the creation of ODS and is one reason why ODS now offers annual training to the residential college staff.

¹ Typically by vote, on recommendations made by the Committee on the Course of Study, the faculty as a whole has responsibility for all matters connected with the educational policy of the undergraduate program, including requirements for all bachelors' degrees, methods of instruction, programs of study, and regulations concerning scholastic standing.

About that same time, members of the Student Life, Health and Athletics Committee of the Board of Trustees expressed their concerns about Princeton's commitment to recruiting, enrolling and welcoming students with disabilities. Although they believed that the quality of accommodations for current students was more than adequate, they felt very strongly that the University could do more to actively communicate the message that students with disabilities are encouraged to apply and attend Princeton and to convey more keenly the University's historical and ongoing commitment to provide reasonable accommodations.

The Advisory Committee solicited feedback from the community in order to gauge the University's progress on the issues of improving the relationship with students who have disabilities, conveying a message that students with disabilities are welcome, and creating an infrastructure that impacts the view of how welcoming the campus is for this population.

IV. KEY OBSERVATIONS AND FINDINGS

A. Evaluation of the Development of ODS

As a central office designed to enhance rather than replace Princeton's multifaceted approach to providing support and services, ODS has succeeded. It is clear to the Committee that ODS has succeeded both in providing an effective, centralized service for reviewing accommodations, with all official requests for academic accommodations flowing through ODS, and in providing increased services and supports to students with disabilities. The Committee is pleased to confirm that ODS has achieved the goal of providing professional staff, in-house expertise, and resources to manage and monitor the increasingly complex interactive approach required for determining reasonable accommodations. In ODS, the University has created a function that improves and strengthens our capacity for evaluating and supporting individuals while providing academic accommodations in a consistent and equitable process.

This Committee is impressed by the amount of activity and the range of support provided by ODS, given the size of the staff and the unfamiliarity, in some areas of the campus, with disability-oriented concerns. There has been increased activity between offices, with the Office of the Dean of the College, residential college staff, UHS, Athletics and ODS consulting regularly on a range of issues including: staff training, management of individual cases, and communications with faculty and parents. The Committee believes that collaborative relationships with other University offices are indispensable for developing cultural norms and administrative practices that foster a welcoming and inclusive community and encourages the dedication of additional resources to this task.

The majority of student, faculty and staff respondents to the questionnaire had praise for ODS and the assistance provided by the Office. ODS staff deserve commendation for providing the personal touch and voice for Princeton's commitment to an inclusive and accessible campus and for successfully connecting with so many members of the campus community.

B. Evaluation of the University's Policies

The Committee was asked to consider several University policies regarding academic accommodations for undergraduate students. The Committee did so in the context of Princeton's institutional values and goals, reflecting on whether the policies strike an appropriate balance between individual accommodations and institutional needs and requirements. The Committee is satisfied that the University's existing policies – as implemented by ODS – work well on the whole and are consistent with the University's mission and institutional values, especially the importance of assuring access for students with disabilities, and recommends only minor revisions. A number of our recommendations relate to improving communications among the various segments of the University community and between key players (i.e. faculty and staff). For further detail, please see Section V.

C. Evaluation of the Institutional Climate

Members of our community shared perspectives and experiences that present a picture of both success and areas for continued improvement regarding the climate for students with disabilities at Princeton. For example, the questionnaire data indicate that the majority of respondents are aware that ODS exists and of the types of accommodations requested. On the other hand, the Committee learned that a subset of students who think they may be eligible for accommodations do not in fact request them; this could be cause for concern in that, while some students may not make requests for good reasons, the possibility exists that others are reluctant to seek out accommodations in a community they believe is unwelcoming or inflexible towards individuals with disabilities.

The Committee also learned that there are conflicting perspectives about ODS' willingness (or lack thereof) to grant accommodations. For example, ODS records demonstrate that 75% of the students requesting extended time are approved for that accommodation. However, the Committee received feedback from concerned individuals who are under the impression that eligible students are not being granted requested academic accommodations (primarily extended time). Several Committee members also cited troubling comments posted online and included as commentary on the questionnaires as evidence that there is still work to do in further reducing the antagonism directed toward the population of persons with disabilities and towards the institution's support of these individuals. This information suggests that the University should consider whether some of the students who think they may be entitled to

accommodations yet do not take the step to request them are influenced in overt (or covert) ways by climate concerns. As can be seen in Section V, below, the Committee makes a number of recommendations aimed at enhancing the institutional culture and addressing issues that may work together to discourage some students from disclosing their disabilities or seeking accommodations.

D. Challenges identified by the committee

1. Defining the Task of Granting Accommodations

Reasonable accommodations must ensure equal access to educational opportunities, but they do not--and cannot--guarantee optimal performance. Families and students requesting accommodations often confuse the right to equal access with the right to achieve academic success, usually defined as high grades. The Committee wishes to state clearly that it is the view of Princeton faculty that all Princeton undergraduates are entitled to *reasonable* accommodations to address, when possible, functional limitations that create barriers to the curriculum, but that no student is entitled to expect a particular grade for any given class. It is worth re-iterating that it is a core principle at Princeton that the curriculum should be challenging to every student. Moreover, the demands of higher education coursework are very different from the demands of the secondary school environment and many students find the transition to college work challenging. Neither type of challenge can be equated with a disorder but rather are appropriate to the academic experience of a liberal arts education at Princeton. Managing student expectations and understanding of this issue is an important challenge for ODS.

2. Transition to Postsecondary Education

The transition from secondary school to college brings with it a change in the rights and responsibilities of both the student receiving accommodations and of the educational institution. These changes often surprise and disorient families, increasing the possibility for complaints that the college or university is being unreasonable and unfair. In the U.S. Department of Education's document, *Transition of Students with Disabilities to Postsecondary Education: A Guide for High School Educators*, it is noted that in the university setting students are expected: to be their own advocates, to review carefully and decide if they can meet the essential academic and technical standards of the institution they are considering, and to acquire the skills that will enable them to act independently and to manage their time.

There are both pedagogical and legal issues that shape how colleges and universities differ from K-12 institutions in serving individuals with disabilities. Higher education coursework is typically less concerned with the acquisition of facts and places greater emphasis on independent learning than secondary school education. Within the framework of a liberal arts

curriculum, all students, no matter the area of specialization, are expected to be independent learners and critical thinkers. Even among its peers in higher education, Princeton is unique in its emphasis on independent research, which is a requirement for the degree, and the precept system, which requires students to be active participants in the educational process. The development of critical study and life skills, such as working independently, managing competing obligations, and completing work in a timely fashion, is an essential educational goal of a Princeton education. Academic accommodations should not impede a student's ability to develop those essential skills.

The legal framework governing elementary and secondary schools is focused on the obligation of publicly funded schools to provide a "free, appropriate, public education" that is designed to meet the unique needs of each child. In contrast, the legal context governing higher education (as well as the workplace and graduate professional schools) promotes opportunity through equal access and emphasizes non-discrimination. Some students and parents familiar with a K-12 approach arrive on college/university campuses with unrealistic expectations and are surprised and upset when requests for certain accommodations are denied (e.g., test interpretation, grade amnesty, disregard of spelling errors, unlimited time for test-taking, etc.).

The differing responsibilities, approaches and expectations result in a heightened need for colleges and universities to evaluate carefully, to give students fair feedback, to set clear limits, and to focus on consistency. At Princeton, some of the pressures operating in the area of disability services have an unintended effect of shifting the focus away from asking whether a student has opportunity and access, and toward debates about whether certain policies and practices consistent with the postsecondary framework are fair and appropriate for the highly selective university context.

3. Variability of Documentation

In addition to the differences from the K-12 setting, the Committee came to the realization that evaluating students with learning disabilities and recommending appropriate accommodations is an art, not a science. At Princeton, testing and documentation are required to evaluate a student's performance on adult-normed tests in comparison to most people. The Committee found that the quality of documentation validating the existence of a learning disability that warrants accommodations in the post-secondary setting varies widely. Problems with documentation include: missing components of a comprehensive evaluation/diagnostic report, lack of justification and rationale for each recommended accommodation, faulty testing procedures, failure to demonstrate a deficit, failure to show how deficits currently limit performance in comparison to most people, reliance on a single test or subtest, and the use of non-specific diagnoses, as well as unclear or indirect language.

The Committee also learned that psycho-educational testing can be very expensive and is not always covered by insurance. The Committee noted with concern the fact that these external factors may tend to advantage students from higher family income levels over those with modest means, and may make it more likely that students from private schools have a history of diagnosis and intervention than those from public schools. These factors suggest that the University should be vigilant about outreach to students who may not have been diagnosed (or diagnosed accurately) prior to college, in order to try to ensure that the students who need accommodations see clearly the opportunity to self-identify and request accommodations.

Although the Committee debated a variety of ways to try to improve the quality and consistency of documentation submitted to ODS, we concluded the University's ability to impact that documentation is fairly limited (without creating an entirely new model for the testing and documentation process). The Committee includes several recommendations regarding University communications that hopefully will, over time, improve the quality of evaluations submitted to ODS. For further detail, please see Section V. below.

4. Impact of Mandatory Requirements on Reasonable Accommodations

The Committee identified a set of issues related to Princeton's structural academic requirements, such as year-long courses, the number of courses that can be taken elsewhere, the absence of a summer session, etc. that may, sometimes, preclude the use of options that might be available at other institutions to address certain types of functional limitations. It is the case that waiving or altering these essential elements of a Princeton degree program is not a reasonable accommodation.

The University's academic requirements are structured within a traditional 4-year, on-campus undergraduate experience. As such, students are expected to study full-time in residence and engage in multiple disciplines in a liberal arts curriculum. They are expected to make adequate progress toward the degree, defined as completing all required junior independent work and a minimum of 24 courses (26 for B.S.E. students) before beginning senior year and embarking on the senior thesis. Students must also be active participants in their education; we expect them to develop critical study and life skills, such as working independently, managing competing obligations, and completing work in a timely fashion. Students may not count more than 3 (4 for BSE students) non-Princeton courses toward degree requirements and they must complete the study of a foreign language.

Students and parents who have experience with other kinds of colleges and universities are sometimes surprised by the comparative lack of flexibility in Princeton's educational requirements. While the limitations on flexibility created by Princeton's academic requirements may eliminate certain possibilities that an individual would prefer, to the Committee noted that

the faculty questionnaire respondents indicate they consider these requirements to be essential elements of a Princeton education. While the Committee affirms the importance of these requirements and the fact that they are actually essential at Princeton, we did note that certain requirements can, in exceptional circumstances, be minimally modified. The Committee concluded that ODS should be permitted to recommend certain exceptions as an accommodation for an individual student, which the Faculty Committee on Examinations and Standing would consider on a case-by-case basis (see Section V.A.5.).

5. Intensity of Challenges to University Decisions

The Committee was pleased to learn that constituents of ODS are generally pleased with the support they receive. However, the Committee was equally struck by the amount of time and energy expended to respond to what is a small number of complaints and appeals each year. ODS's resources can be utilized better if changes can be implemented to minimize the acrimony and/or time spent addressing these matters. We recognize that careful reviews and determinations of reasonable accommodations is a complex task, and under the best of circumstances, differences of opinion will occur. The intensity of the academic, social, and emotional challenges faced by students entering a higher education environment for the first time may also add to the possibility of acrimonious challenges. Some future modifications and enhancements to policy or process seem appropriate and even quite promising. Yet it is also important to realize that, in light of the challenges of a transition to the University, it is unlikely that any enhancements would entirely eliminate the possibility of complaints. Additional resources for ODS, as described by the recommendation in Section V.D., will allow ODS to continue to effectively support the students receiving accommodations while addressing the small number of contested decisions.

V. RECOMMENDATIONS

A. Related To Policy

1. The Committee recommends that requests for accommodations should continue to be evaluated based on a comparison of the student to the "normal range" of the relevant physical or mental function, or to most people in the general population. This standard is the right one for Princeton philosophically in addition to being the governing legal standard. Although it is within the University's discretion to apply a lower threshold than the law requires, we are uncomfortable with alternative models, especially ones that rely on intra-individual discrepancies, as a basis for determining a disability.

2. The Committee recommends that the University continue using the “normal” or “average” range of functioning to evaluate functional limitations, consistent with the norms developed for psycho-educational tests, which typically define the average range as being one standard deviation above and below the mean. We also recommend, however, that the University slightly modify its use of the “normal range” standard, by taking into account the error range (the margin of error or “standard error of measurement”) for these tests. As a practical matter, this would be equivalent to a slight narrowing of the normal/average range. For example, for a test with a mean of 100, where the average range is usually identified as being between 85 and 115, a margin of error of 5% would narrow the average range to be between 90 and 110. Princeton would consider a cluster of relevant scores at or below 90 to be supportive of a substantial functional limitation. Appropriate accommodations would then be considered within the context of ODS’s holistic approach, which factors in a variety of information.
3. The Committee recommends that ODS not make use of the results of the Nelson Denny Reading Test in determining accommodations. The Nelson Denny is a screening tool, which does not result in diagnoses; a positive screening result indicates only the need for a thorough assessment.
4. The Committee supports the view that, in many or most instances, note-taking is an academic exercise of prioritizing and organizing information, and a note-taker should therefore be utilized as an accommodation only when no other method can be used to make the material accessible, which has ordinarily limited its application to students with physical or sensory impairments. That said the Committee believes that provision of a note-taker may be a reasonable accommodation for some students in certain courses, such as courses where the note-taking is not deemed by the teaching faculty to be an academic exercise or where the alternative method – such as recording of lectures—is inappropriate. The Committee recommends that ODS use its discretion to determine, through an interactive process for specific individuals, whether note-taking may be an appropriate accommodation for a student with a cognitive or psychological disability.
5. The Committee recommends that, in the most exceptional circumstances, ODS may make a recommendation to the Committee on Examinations and Standing (through the Office of the Dean of the College) that, as an academic accommodation for a documented disability, a student be permitted to take additional preapproved outside courses to count towards the Princeton degree; and/or may make a recommendation to the Committee on Examinations and

Standing that a student with a disability be permitted, as an accommodation, to complete an A.B. or a B.S.E. in five years. In each case, a decision on the recommendation would be made on a case-by-case basis by the Committee on Examinations and Standing. The Committee is aware that these recommendations, in particular, have a significant potential to impact financial aid and may require additional consideration and/or planning prior to implementation.

6. The Committee recommends that ODS be authorized to utilize a variety of increments of time for extended time on examinations, for example, 25%, 50%, and 100% extended time. ODS should develop guidelines to aid in making judgments about approving various increments of extended time utilizing current research and best practices. Recognizing the individualized nature of each case, efforts should be made to provide guidance in advance to students and families, e.g., by including the information on the ODS website.
7. The Committee feels strongly that it is in the best interests of prospective students, their families and the institution, for the University to make every reasonable effort to notify admitted students who request academic accommodations in a timely manner of the initial decision on their request in advance of May 1. Of course, students would continue to be required to meet with ODS for an initial intake interview when they arrive on campus and ODS may “fine-tune” accommodations after the intake interview.

Implementation of this recommendation would allow students trying to decide whether to attend Princeton to have an initial determination regarding accommodations in advance of accepting the offer of admission. Of course, it would significantly shorten the timeframe for students to submit and ODS to review documentation. And although ODS is not likely to receive requests totaling more than 100, it seems unlikely that this can be achieved by ODS at current staffing levels. The Committee discussed the possibility of ODS engaging sufficient outside consultants to do the necessary reviews. Further consideration and careful planning is certainly necessary in order to implement this recommendation.

In the case of insufficient documentation (or a student who disputes a denial of accommodations), we expect the student would have to make the decision whether to accept the offer of admission with no extension of the May 1 deadline. We would anticipate that instances of insufficient documentation could be resolved one way or another by September, and that if it is decided to provide any appeal

process from the determination, such appeal would not take place until after the May 1 admission deadline.

8. For “likely letter” recipients, the Committee recommends that ODS permit requests for accommodations to be submitted prior to receiving a formal letter of admission. Upon receipt of the “likely letter,” typically in the Fall semester, a student may make a request for an initial determination regarding eligibility for reasonable accommodations.

B. Related To Procedural Matters

1. The Committee recommends that, in those instances where ODS’s initial review would not support approval of the requested accommodation, an outside consultant be utilized to both review any student’s documentation, including cases where the documentation is unclear or insufficient, and determine eligibility.
2. The Committee further recommends that the University cover the costs of initial or additional testing recommended by ODS or its consultants as necessary for the determination of accommodation for students who qualify for financial aid and that those tests be administered by an ODS-approved specialist.
3. The Committee recommends that ODS provide students who disagree with a denial of accommodations a process under which the student may request reconsideration of the decision, with ODS having the resources to utilize a second independent consultant to review the request and make a recommendation to ODS. (This reconsideration process would replace the process now described as “Informal resolution” in ODS’s grievance procedures.) If the dispute is not resolved by reconsideration, then the student would have the opportunity to appeal to the Vice Provost for Institutional Equity & Diversity.
4. The Committee recommends that ODS materials and other resources clarify the scope of appeals to the Vice Provost, which may be made only on procedural grounds, and that the Vice Provost will not disturb the factual conclusions of ODS and its independent experts.
5. Although it is ordinarily the case that preferential registration is not an appropriate accommodation at Princeton because there is a long lead-time between choosing courses and the start of the semester, the structure of course registration for entering freshmen can pose special challenges for students with physical or sensory impairments. The registration of freshman during the orientation period in the fall, only days before the semester begins, may make it difficult to

accommodate special needs. The Committee recommends that ODS, the Office of the Dean for Undergraduate Students, and the Registrar work together on issues of course location and scheduling to assist students with physical or sensory impairments to select their courses ahead of time.

C. Related to Communication Efforts

1. The Committee recommends that the University communicate more widely and more frequently about ODS's role, services and procedures, including requiring that each department take responsibility for ensuring that the faculty are aware of ODS, its policies and its services, in order to ensure that students with disabilities are referred to ODS when needed and to encourage faculty to work with ODS to decide on and facilitate educationally appropriate accommodations.
2. The Committee recommends that residential college staffs should include ODS information in their Freshman Orientation meetings, and that freshman faculty advisers should receive information about ODS; and that ODS's website be comprehensively and professionally re-designed to most effectively communicate information to all members (or prospective members) of the University community. (See also Section V.D. below).
3. The standards of documentation and testing should be included in the acceptance packet for admitted students and the information regarding documentation requirements provided with likely letters, so that students have the information to help make decisions about Princeton.
4. The Committee recommends that the "Student in Difficulty" form be revised and adapted to allow faculty to communicate concern about non-academic as well as academic difficulties.
5. The Committee recommends that the University consider additional ways to reach out to students who do not choose to self-identify but may be in need of accommodations.
6. The Committee believes it would be helpful to students and beneficial to ODS for the University, whether through Counseling & Psychological Services or through ODS or other offices, to make available a list of qualified or approved
7. diagnosticians for psycho-educational testing and evaluation. This would be one way of trying to improve the quality and consistency of the documentation submitted to ODS and reduce potential conflict between recommendations made

by evaluators unfamiliar with Princeton and ODS's determinations regarding accommodations.

8. The Committee recommends that a standard statement (similar to ODS's template syllabus statement) regarding academic accommodations and ODS services be incorporated into Blackboard so that all students see it in connection with their course work.
9. The Committee endorses the offering of periodic, optional workshops and trainings for preceptors/faculty on disability policies, procedures, and related issues by appropriate offices. This can provide valuable opportunities for faculty to discuss how to handle certain behaviors in the classroom and to learn about options for modifications that may be educationally appropriate. The Committee also encourages the University to create opportunities for ODS to join regular meetings, such as the beginning of the year Chairs' meeting, departmental meetings, etc. Whether in the form of the prior recommendation or through other channels, we encourage the University to offer more information to faculty regarding options for modification of assignments where the integrity of the academic assessment can be maintained. The Committee notes that ODS's ability to accomplish these additional tasks will be greatly enhanced if the recommendations for additional resources that follow are accepted.

D. Resource Needs And Recommendations For Further Review

1. The Committee felt that there were a few areas that fell outside of the available scope for its review but nevertheless, we hope that the University provides a mechanism for further review of these important issues.
 - a) We recommend that the University request the appropriate academic group to review and, if necessary, re-articulate the essential elements of a Princeton undergraduate education. This would include the following recommendation regarding foreign language waivers, as well as other academic requirements articulated in Princeton's policies and procedures. The Committee recognized the central importance of clearly articulated expectations regarding the essential elements of a Princeton education, yet concluded that this important issue was beyond the scope of the Committee's work this semester. The survey responses indicate some variance of opinion among faculty about whether certain modifications are consistent with Princeton's educational goals and values and the Committee believes the University

would benefit from a broad-based, deliberative process to consider which academic elements are fundamental or essential to a Princeton education.

- b) Our threshold for foreign language waiver (as compared to our peers) would benefit from additional review and consideration.
- c) On a related matter to the preceding point; the Committee discussed the fact that a few peer institutions allow American Sign Language (ASL) to meet their foreign language requirement. The Committee recommends that the appropriate body of the University review this as a possible option at Princeton, in addition to exploring the related topic of offering ASL as a credit-bearing language course (as appropriate based on demand).
- d) The Committee strongly feels that the University and ODS would benefit from investing in a comprehensive and professional re-design of ODS's website, in order to most effectively communicate information to all members (or prospective members) of the University community. Enhancements might include providing information about the ADA, its recent amendment, our obligations, and actual data regarding accommodations offered annually, for instance. Such information might serve to dispel myths, reduce stigma around self-identification and minimize misunderstandings about University policies.
- e) The Committee recommends that increased resources be available to help the range of students who have received accommodations in the K-12 setting make an effective transition to Princeton. In particular, a future Committee should study the most effective way of supporting students who have learning disorders or differences. For example, the McGraw Center for Teaching and Learning might be expanded to include one or more learning specialists, who can assist and instruct students in the development and deployment of various interventions and strategies for successful learning and improved performance.
- f) The Committee spent some time learning about and discussing the special challenges related to determinations of and accommodations for psychological disabilities. However, we felt that this area of disabilities was too large, complex, and ultimately important for this Committee to approach and do a review that does the subject justice. We therefore

recommend that the University convene an independent task force to study and review the special problems related to understanding, communications, and accommodations for psychological disabilities. This recommendation is further supported by the continually documented rise in mental health problems, use of psychotropic medications, and certain mental disorders, such as bipolar and autism spectrum disorders.

2. The Committee concludes that, while current ODS staff has done a commendable job serving their population and building effective relationships with other offices, the Office is currently not resourced to optimally fulfill its mission.
 - a) The Committee supports augmenting ODS's current staffing lines to create additional capacity for implementing (and sustaining) our recommendations. Specifically, we suggest that there is reason to think that ODS needs at least one additional staff member to help handle the current caseload of students, and certainly to respond to increases in the population that are likely to result from implementation of our recommendations.
 - b) There is also support among our peers for a model of service delivery for students with disabilities that include having an experienced psycho-educational diagnostician within the health services function, as well as learning specialists within a student support office such as the McGraw Center for Teaching and Learning. These positions would have clear responsibilities for collaborating with and supporting the mission and goals of ODS.
 - c) Finally, if the recommendation to provide the initial determinations regarding accommodations for admitted students prior to May 1 is implemented, ODS will almost certainly require additional funding (or seasonal staffing) to support the time-sensitive need of reviewing all requests within a matter of weeks.

APPENDIX A

REFERENCE LIST OF RESOURCES

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Morris, Robert, Bennett A. Shaywitz, and Sally E. Shaywitz. "The Education of Dyslexic Children from Childhood to Young Adulthood." *The Annual Review of Psychology*. 2008. 59:451-75.

"Responsiveness to Intervention (RTI): How to do it." National Research Center on Learning Disabilities. August 2006.

Shaywitz, Sally. "Dyslexia." *Scientific American* November 1996: 98-104.

Stretch, Lori Ann S., and Jason W. Osborne. "Extended Time Test Accommodation: Directions for Future Research and Practice." *Practical Assessment, Research and Evaluation*. Vol . 10, No. 8 (2005).

"The Solution Book: Answers to the Disability Service Provider's Most Challenging Situations." LRP Publications.

"Three Tier Intervention Research Studies: Descriptions of Two Related Projects." *Perspectives*. Winter 2006. The International Dyslexia Association. P 30.

"Transition of Students With Disabilities To Postsecondary Education: A Guide for High School Educators." U.S. Department of Education Office of Civil Rights. March 2007.

APPENDIX A

“Understanding the Americans with Disabilities Act Amendments Act and Section 504 of the Rehabilitation Act: The Impact on students with LD and AD/HD.” Parent Advocacy Brief from National Center for Learning Disabilities.

“What is Response to Intervention or RTI?” LDS Newsbriefs. January/February 2006.