AMERICANS WITH DISABILITIES ACT
SELF-EVALUATION OF PROGRAMS AND ACTIVITIES

Coordinated by:
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BACKGROUND

Santa Barbara City College has long recognized its obligation to the local community and the need to make higher education accessible to persons from all walks of life. The college’s mission statement reflects these beliefs. Prompted by Section 504 of the 1973 Rehabilitation Act, persons with disabilities have been included as part of the college’s non-discrimination and institutional outreach efforts.

The effort to go beyond minimum standards has been ongoing at SBCC. The institution has attempted to develop processes, policies and procedures that provide access to all the activities and programs offered by the college. The institution recognizes its responsibility to place the same emphasis on physical barriers, communication barriers, and attitudinal barriers towards persons with disabilities as we do on other types of barriers, such as economic barriers.

Our college is viewed as a leader in the community. The members of the "Coalition for Community Access", a group of local businesses and organizations advocating for disability rights, have recognized that our college is one place where community values are developed or refined and that we are a model for future generations. Local business and industry are asking for our guidance in addressing issues of diversity and non-discrimination on the basis of disability in employment.

Our responsibility to our community and the Americans with Disabilities Act (ADA), PL 101-336, has focused the attention of our campus leaders on extending our commitment to provide access. SBCC acknowledges that the passage of the ADA is the federal government’s legal enforcement of a right to access for at least 43 million individuals in the United States who have one or more disabilities. SBCC recognizes the broad reach of the ADA as seen in the strong bipartisan support behind the law and the multitude of agencies who have regulatory responsibilities under the ADA: the U.S. Department of Justice (DOJ), the U.S. Department of Education (DOEd), the Equal Employment Opportunity Commission (EEOC), the Department of Heath and Human Services (HHS), the Federal Communications Commission (FCC), and the U.S. Department of Transportation (DOT).

SBCC understands that ADA compliance must be an institutional priority as a matter of principle, law and practical economics. SBCC will vigorously continue its good faith effort to establish policies and procedures that clearly reflect our understanding of the intent of the ADA.
POPULATION IDENTIFICATION

SBCC understands that protection under the ADA is afforded to every person who has, used to have, or is treated as having a physical or mental disability, or who is associated with a person with a disability. The law protects any person with a physical or mental impairment that substantially limits one or more major life activity. SBCC recognizes that it is not only students who are protected by the ADA but also employees and visitors who have disabilities.

SBCC uses the reference list provided by the American Association of Community Colleges, (1992), in their publication ADA: Audit, Transition Plan and Policy Statement for Higher Education (p. 17):

Persons with mobility impairments, such as those who suffer from paralysis or use wheelchairs, crutches or walkers,

Persons who have lost one or more limbs,

Persons who are blind or have vision impairments,

Persons who are deaf or are hearing impaired,

Persons who have mental or psychological disorders, including mental retardation or emotional and mental illness,

Persons with learning disabilities,

Persons with psychological disorders such as depression or post-traumatic stress syndrome,

Persons with cosmetic disfigurements, such as burn victims,

Persons with serious contagious and non-contagious diseases, including AIDS, AIDS related complex, epilepsy, cancer, and tuberculosis. Persons who are HIV positive, with no other symptoms, may be covered,

Persons who are drug addicts or have suffered from drug addiction in the past are protected only if they are not currently using illegal drugs,

Persons suffering from alcoholism are covered, even if they are not in rehabilitation but they can be required to conform to the same standards as other employees,
Persons with a record of an impairment or a history of disability,

A person who is considered to be disabled,

Persons who have a known association or relationship with a disabled individual.

**ADA COMPLIANCE COORDINATOR**

In compliance with the Department of Justice ADA regulations (28 C.F.R. 35.107a) SBCC has designated one employee as ADA Compliance Coordinator: the DSPS Coordinator. The Department of Justice envisions that the ADA coordinator will have three responsibilities:

Initial coordination of compliance;

Oversight of ongoing compliance efforts; and

Investigation of ADA complaints.

**SELF-EVALUATION REQUIREMENT**

A major requirement of the ADA is that all public entities conduct a self-evaluation or audit of employment policies and practices, facilities, educational programs and student service activities. In addition, a transition plan must be developed to identify the process for removing structural barriers.

SBCC divided its self-evaluation into three components:

A. The evaluation of facilities, barrier identification and transition plan for structural changes was coordinated by Dr. Charles Hanson, Vice President, Business Services. Alex Meisel, an accessibility consultant at Cearnal Ehlen Associates, was hired to complete this project.

B. The evaluation of employment policies and practices was coordinated by Daniel Oroz, Vice President, Human Resources.

C. The evaluation of programs and activities was coordinated by Janet Shapiro, ADA/Section 504 and DSPS Coordinator.
PROCESS FOR SELF-EVALUATION OF PROGRAMS AND ACTIVITIES

SBCC views the process of self-evaluation as ongoing. The four activities conducted in preparation for this report will provide a basis for continuing evaluation: identification, review, analysis and recommendations.

I. IDENTIFICATION

The ADA Coordinator identified SBCC's programs, activities and services:

A. Academic Programs and Services:

- academic requirements and regulations
- examinations and testing
- classroom auxiliary aids and services
- furniture/work station lay-out
- off-campus programs and activities
- research
- curriculum development
- media/audio/visual materials
- computers and technology
- internships

B. Student Services:

- recruitment
- admissions
- student health
- counseling
- financial aid
- athletics and recreation
- campus transportation
- career development
- job placement
- grievance procedures

C. Non-Academic Activities or Services

- emergency response plan
- fine and performing arts
- athletic events
- library resources
- bookstore services
- food services
- use of campus facilities
lecture series
graduation ceremony
child care
information
publications
security
telecommunications
computer technology
student clubs & student government
college development/foundation

II. REVIEW

The ADA Coordinator reviewed policies and practices that govern the administration of the college’s programs, activities and services, reflected in laws, ordinances, regulations, administrative manuals or guides, policy directions and memoranda or other practices based on local custom:

A. Interviews

During November and December, 1992, the ADA/504 Compliance Coordinator completed meetings and telephone interviews with SBCC students, SBCC employees, members of the public, individuals with disabilities and representatives of community organizations. These interviews were acknowledged as part of an ongoing process of communication in order to assist SBCC with identifying the need to make changes both now and in the future. The following individuals were invited to provide input regarding the institution’s obligations under ADA:

- Academic Deans and Vice President
- Student Services Deans and Vice President
- Adult Education Deans and Vice President
- Coalition for Community Access
- SBCC Disabled Is-Abled Student Club
- DSPS students
- DSPS Faculty, Staff & Service Providers
- DSPS Advisory Committee
- SBCC Faculty and Staff
- SBCC Academic Senate
B. Survey

The ADA Coordinator distributed a survey to SBCC faculty and staff. The survey invited employees of the district to write suggestions for improving access for persons with disabilities at SBCC. 68 faculty responded.

III. ANALYSIS

The analysis of whether or not SBCC's policies and practices adversely affect the full participation of individuals with disabilities in college's programs activities or services is an ongoing process. For the purposes of this self-evaluation the analysis was completed by the ADA Compliance Coordinator in cooperation with the persons interviewed in IIA, above, and the following experts: (a) SBCC Disabilities Specialists and (b) members of the Coalition for Community Access.

IV. RECOMMENDATIONS

A. GOAL

Develop campus-wide awareness of well-established, currently existing policies and procedures for responding to grievances and requests for accommodations for persons with disabilities such as those listed below:

requests for auxiliary aides
    such as interpreters, notetakers or mobility aids

requests for alternate format
    such as books on tape, enlarged print or braille

requests for academic adjustments
    such as extended time on tests, course substitutions or priority registration

requests for adapted equipment
    such as listening devices, voiced word processing or electronic key guards
requests for equivalent access
such as reassigning class to an
accessible location, reassignment of
seating or redesign of equipment

Objectives:

1. Provide policy information in the Student Planning Guide and Department Chair Handbook and present the information at student and faculty orientations.

2. Incorporate ADA compliance statements with other non-discrimination statements in the College Catalog, Schedule of Classes and Application cover.

3. Establish an on-going, college-wide in-service program, to ensure employees and students are familiar with established policies and practices.

B. GOAL

Develop administrative policies and procedures for ongoing ADA compliance as an integral part of college planning and management.

Objectives:

1. The Affirmative Action Committee will respond to issues regarding ongoing ADA compliance; e.g., monitoring the identification of barriers to access and recommending corrective action.

2. Develop and modify survey and reporting methods to ensure an ongoing procedure for accepting comments about access barriers from the campus and community and consulting with individuals with disabilities and the organizations that represent them.

3. Establish an administrative procedure for setting priorities and developing budgets to ensure corrective action. This procedure
would also include written documentation if a specific accommodation would result in an undue administrative or financial burden or would result in a fundamental alteration of services.

4. Incorporate consideration of ADA requirements in all college planning and committee activities.

C. GOAL

Develop and implement procedures for raising awareness of the requirements of the ADA at all levels of the institution.

Objectives:

1. Implement a college-wide series of in-service presentations.

2. Authorize employee attendance at in-service presentations.

3. Develop an ADA in-service handbook.

CONCLUSION

The ADA has been and will continue to be a highly visible, well publicized law. SBCC welcomes the increase in disabled applicants and students requesting accommodations as well as the increased representation of job applicants and employees with disabilities.

The SBCC community recognizes that no one department or person can handle institution-wide compliance. ADA compliance is an institutional priority that has the support and encouragement of the trustees; has direction and coordination from administrators; and has support and participation from all employees and students.

SBCC is committed to continued efforts to work towards the removal of all physical, procedural, attitudinal, and communication barriers and to develop strategies to assure equal access for all members of the campus community.

(W:ADAEVAL)