

Accommodations for Campus Guests
CSUCI President's Operational Effectiveness Challenge
March 2024

Core Team:

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Overview:

CSU Channel Islands does an excellent job managing student, faculty, and staff disability accommodations, but lacks a clear accommodation protocol for guests to campus events. By addressing the issue at hand, the University can create a similar accessible and equitable experience for guests on the campus.

Case Narrative:

CSUCI offers many lectures, experiences, and events open to the public. If a guest to the campus requests disability accommodation, we offer a single point of contact for that request to be submitted. However, our ability to process the request internally is hampered by a lack of internal process and clarity. This creates a negative impact on the effectiveness and efficiency of accommodation implementation, leading to what could be a less-than-ideal experience for campus guests with disabilities. What part of the structural apex of CSUCI has responsibility for ensuring guest accommodations are heard, evaluated, and granted? What midlevel departments on the campus have responsibility for ensuring these accommodations are made? What part of the University Budget is designated to fund these guest accommodations? Through the lens of Bolman and Deal's *Four Frames*, the research team examined the current environment at CSUCI, and additionally, examined the disability accommodation practices for campus guests at other institutions.

Illustrative Vignettes: True Stories from the Trenches

Example 1 - The Title IX & Inclusion office received a phone call from a non-student who is deaf. The individual wanted to attend a public event hosted by a student club. The Title IX office reached out to the sponsor of the event to determine what accommodations would be required based on the event agenda, but the sponsor had not considered what activities might require accommodation. They had not budgeted for accommodations and, as a result, could not afford to pay for ASL interpreting, which was about \$500. Given the Title IX & Inclusion office had worked with a vendor-approved to do ASL translating at CSUCI, it requested services on the club's behalf after contacting Events to see what their protocol was. Events had no protocol and were not equipped to provide accommodation for a third party. Questions remained: Who was responsible for sourcing and paying for an ASL interpreter? Who was supposed to organize communication between the guest and the interpreter(s)? Where was the invoice supposed to go?

Example 2 – The honor society for students with disabilities, Delta Alpha Pi (DAPI), had arranged for a speaker to come to campus. The speaker was deaf so there was a need to provide accommodation in the form of ASL translation so the hearing members of the audience could understand the speaker. DASS, who only provides student accommodations, was contacted by the DAPI 2 days before the speaker's lecture date with an accommodation request. No one in DAPI

knew who to ask for a campus guest accommodation. The Student Clubs and Organizations office did not have this information either. To add to the complexity, DAPi did not have a budget to pay for ASL translation. Questions remain: Who should arrange and schedule this accommodation? Who should be funding the accommodation for the speaker?

Example 3 – A student with Cerebral Palsy, limited mobility, and who utilizes a motorized wheelchair wanted to participate in a multi-day class trip to Santa Rosa Island Research Station. Given this was a visit to a CSUCI-operated facility housed on a federal National Park, questions came up about whose responsibility it would be to ensure equitable access to the various locations on the island. There is an ADA-compliant bathroom available, but it is about 100 meters down a dirt path from the bunkhouse where people sleep. Would there be a wheelchair-accessible ramp into the bunkhouse? Are the walkways from the pier to the bunkhouse and other buildings ADA-compliant? How does an individual in a wheelchair get off the boat and up the stairs to the top level of the pier? Who is responsible not only for the answers to these questions but for providing – and paying for – accessibility at the Research Station?

Summary of Findings:

CSUCI has readily available and easy-to-locate accessibility and disability accommodation statements for students, faculty, and staff. There is sometimes a variation of the following statement included in the marketing and communications:

The University encourages persons with disabilities to participate in its programs and activities. If you anticipate needing any type of accommodation or have questions about the physical access provided, please contact Disability Accommodations and Support Services at (805) 437-3331 or accommodations@csuci.edu as soon as possible, but no later than 5 business days prior to the event.

The statement will often be customized to list Human Resources (HR) as the contact for campus guests, though this is not always the case. We also found some instances where the disability accommodation statement was missing from some Fall '23 and Spring '24 event announcements. Per current best practices, all event announcements should include a disability statement and point a campus guest to communicate with HR.

When a guest requests an accommodation request to a campus event, HR should field the call, often unaware of the event or the event specifics. HR will document the accommodation request and verbally assure the guest that the accommodation will be granted. Contact information is collected and a promise to call and verify the accommodation is made. At this point, HR is met with several questions including:

- What is the event?
- When is the event?
- Where is the event being held?
- What is the nature of the campus guest's accommodation needs?
- Is the requested accommodation the best solution to create an equitable experience for the guest?
- What campus resources are available to accommodate the guest?
- What specialized vendors are required for specific accommodations?

- Who will provide funding for the accommodation services?

HR will often need to communicate with the campus department hosting the event to answer questions regarding the “what, when, and where” of the event. They will have gotten some idea of the nature of the guest’s required accommodations but will often have to work with other offices on campus to ensure they are providing the best accommodation, and that the accommodation is being met in a manner that is compliant with the law and CSU policy. HR must also secure services from vendors to satisfy the accommodation and ensure those services are paid for.

There is a clear understanding on the part of those midlevel staff working on guest accommodations issues that accommodations are an issue of complying with state and federal laws, and that the expectation is that the university should not be subjected to undue risk. The structural apex expects everyone at CSUCI to place value on social justice and the DEIA ideology. Midlevel staff operate under these guiding principles, yet there is a lack of clarity regarding the process of how to effectively provide our campus guests with disabilities with an equitable campus experience.

In the spirit of delivering a positive experience to campus guests, several unofficial fixes have been utilized to meet the needs of various campus guest situations. These methods satisfy the need to serve the accommodation requirements of the guest, but they are inappropriate, unsustainable, and unreliable for the long term. The student-serving Disability Accommodations and Support Services has on many occasions arranged and paid for campus guest accommodations (using Division of Student Affairs funds) as it possessed accessibility knowledge, appropriate vendor contacts, and active purchase orders. It was discovered that on at least one occasion, an individual from HR paid out of their own pocket for an accommodation-related item. Again, the guests were served and the expectations around accommodations at CSUCI were met, but through the use of inappropriate and unsustainable funding sources.

The team conducted research on other CSU campuses with less than 15,000 students as well as a few larger schools for comparison (Appendix A). What we found amongst the CSUs with less than 15,000 students is that there is no consistent manner by which guests to campus events are accommodated. Midlevel offices from ADA Compliance to the Student Accommodation Office to the Events Office will receive a guest’s accommodation request. Often, the Student Accommodations Office will facilitate the accommodation and, in most cases, the department hosting the event will pay for the accommodation. Two campuses did not respond to our query and didn’t provide any campus guest accommodation information on their website. There was one other campus that had no regular established process or funding plan, similar to what we see at CSUCI. They are curious to see how this issue is resolved at CSUCI and would like to learn from our experience.

The larger schools had enrollments of over 15,000 students and included state and private institutions. The larger schools have accessibility placed at the forefront of campus event messaging. Many place the responsibility of taking accommodation requests and paying for accommodations on the department hosting the event. Accessibility is thought to be “everyone’s responsibility” and regular training is provided to all staff, so they know how to take requests,

who to bring questions to, and where to find resources and vendors on their campus. Guidance for accommodations is often provided by the Accessibility and/or Inclusivity Offices (or equivalent) and is guided by various vice president-level members of the structural apex.

Many of the larger schools we researched have large athletics, performing arts, robust research programs, or all three. It would make sense that institutions offering revenue-generating academic events and entertainment to the public would have a well-thought-out plan to support universal accessibility for community guests. While CSUCI is not operating on the scale of UCSB, Oregon State or USC, utilizing the large school model where accessibility on campus is everyone's responsibility makes perfect sense and is a good foundation to operate from as the campus grows and expands. A model where the campus department hosting an event assumes responsibility for taking accommodation requests, builds accommodation funding into budgets and where basic skills and resource knowledge is taught regularly makes sense. This model would push every division and department at CSUCI to more effectively "walk the DEIA talk" and would do much to alleviate the confusion we experience at CSUCI.

There is also the question of how the campus can have easy access to the best vendors and pay them using a funding source that makes sense. CSUCI must explore a model where blanket purchase orders can be opened with approved vendors for services such as wheelchair rental, ASL, Tactile ASL, and live captioning, where any department can order and pay for services from a central accommodations fund with their department accounting string.

There will always be situations where accommodations requiring more specialized knowledge and expertise will need to be called upon. Title IX, HR, and the DASS office at CSUCI possess this knowledge and will always serve as a source of expert guidance and training as needed.

Key Findings (As Defined by Structural, Cultural, HR, Political Frames)

- Disconnect between the expectations of the apex concerning accommodations and the resources and knowledge provided to the midlevel staff to execute them (Cultural Frame)
 - This disconnect leads to last-minute solutions being inappropriately executed and financed by the midlevel parties who are tasked with providing student, staff, and faculty accommodation on campus (Political Frame)
- Universal accessibility is embraced and expected by the structural apex, but the resources for most individuals in the midlevel to deliver universal accessibility are not present or fully realized (Cultural Frame)
- Inconsistent messaging to community guests from campus departments hosting events regarding disability accommodations (Cultural Frame)
- Lack of communication from event hosts to current midlevel service providers (Structural & Cultural Frames)
- Lack of clear responsibility for funding and funding sources for campus guest accommodations (Political Frame)
- Other smaller schools in the CSU have a similar event accommodation issue (Cultural, Political & Structural Frames)
- Larger schools both state and private with a fiscal interest in guest satisfaction have established best practices for guests requiring disability accommodation (Political Frame)

Proposed Actions and Areas of Continued Research

- Research the need for, and feasibility of, the creation of a new position description for an individual responsible for event-based and third-party disability accommodations. This position description may also include other duties related to compliance. Identify and consult with any CSU campuses with similar positions.
- Convene a committee of campus accessibility partners (Facilities Services, DASS, University Events, Human Resources, TLI, ASI, HRE, etc.) to review the campus's current timelines, processes, and procedures as they relate to the physical CSUCI campus. This committee will make recommendations regarding improvements to the timelines, processes, procedures, and the regularity with which the committee will convene.
- Research the cost associated with purchasing items that may be utilized to provide common disability accommodations for event guests such as wheelchairs, ramps, and specialized wheelchair-accessible golf carts.
- Consult with the Chancellor's Office and other relevant governmental compliance officers to identify best practices as they relate to training for employees concerning ADA compliance and universal design.
- Review current event planning processes to include consultation about and consideration of campus guest accommodations and universal accessibility.

Desired Outcomes from Actions

- Accessibility is no longer compliance-driven and becomes the responsibility of the entire campus, rather than the responsibility of only a few individuals. Disability accommodation will become recognized as the social justice issue it is where every department hosting a campus event meets the goal of universal accessibility.
- A shift in the campus culture, where creating a compassionate and universally accessible community is everybody's business.
- Baseline accessibility standards for all events are defined and written into event budgets as an element of the planning process.
- Baseline accessibility standards for all facilities on campus are identified, as are timelines for meeting these baselines if they are not already met.
- A clear vision from the structural apex that "at CI, accessibility is everyone's business."
- A clear vision from the structural apex around who manages which piece of the accommodation process and a clear map of the support structure and fiscal means to execute those accommodations.
- Universal accommodation language will be embedded in position descriptions for coordinators, analysts, and other staff who have a hand in planning events potentially open to the community.

- A centralized funding source for all accommodations (regardless of who they are for) on campus will be explored.
- Best practices that allow for multiple departments to expend funds for accommodations from a single vendor PO will be explored.
- Development of training and resources for the campus community to ensure everyone can do their part in ensuring accessibility.
- Long-term: Hire an ADA Compliance Officer that will:
 - Ensure CSUCI complies with CSU Executive orders and local, state, and federal law.
 - Manage campus accessibility training for staff who plan campus events.
 - Manage and appropriately direct questions and inquiries from campus event planners.
 - Regularly review and update campus practices, resources, and policies to ensure ADA compliance.
 - Partner with Facility Services to maintain accessibility on campus (grounds & facilities).

Appendix A

CSU with >15,000	Who takes the accommodation request?	Who pays?	Who provides Guidance?	Notes
CSU Chico	Event Host	Event Host	Student Accommodations Office (SAO)	NA
Cal Poly Humbolt	ADA Compliance Office	Event Host	ADA Compliance Office (Title IX, SAO)	ADA Compliance office over sees all student, faculty, staff and guest accommodations.
CSU Stanislaus	Events Office	SAO	SAO/HR	Working to create a new model where SAO only advises and the campus departments are take requests and fiscal responsibility.
CSU East Bay	SAO	SAO/Event Host	SAO	SAO has a point person assigned to campus events, with a budget line for non-student accommodations. Event host pays for campus guest accommodations
CSU Dominguez Hills	NA	NA	NA	CSUDH did not respond to queries and do not offer website information about accommodations for campus guests
CSU Sonoma	No plan	no plan	no plan	Sonoma has no funding plan or established process
CSU Bakersfield	NA	NA	NA	CSUB did not respond to queries and do not offer website information about accommodations for campus guests
CSU San Marcos	SAO	SAO/Event Host	SAO	SAO has a point person assigned to campus events, with a budget line for non-student accommodations. Event host pays for campus guest accommodations
CSU Monterey Bay	Events Office	Event Host	SAO/HR	Events Office has a point person assigned to accommodations. Event host pays for accommodations.
CSU Sacramento	Event Host	Event Host	VP of Inclusive Excellence office (Title IX, Disability Advocacy Group, SAO, Office of Universal Access and Inclusion)	ASL and Captioning have become a universal standard arranged by event host
Oregon State	Event Host	NA	Title IX, SAO	campus provides accessibility training to departments running events and works towards universal accessibility
USC	Office of Institutional Accessibility	NA	Office of Institutional Accessibility (SAO, Title IX)	Campus provides accessibility training to departments running events and works towards universal accessibility
Stanford	Diversity and Access Office	NA	Diversity and Access Office	Diversity and Access Office is a combo of the Ombud's Office and Title IX. SAO is not involved
UCSB	ADA Compliance Office	Event Host	ADA Compliance Office	ADA Compliance is Housed in the Admin Services Division. SAO is not involved.
UC Merced	NA	NA	NA	UCM did not respond to queries and do not offer website information about accommodations for campus guests
Campus with <15,000 students				