



Internal Audit Report

Accessibility and Accommodations

Report No. SC-20-02
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I. EXECUTIVE SUMMARY

Audit and Management Advisory Services has completed a review of Accessibility and Accommodations. This review was included on the FY20 internal audit plan. Our audit was primarily focused on controls in place to ensure nondiscrimination on the basis of disability as they relate to student accommodations, though we did also address potential areas of control risk in public accessibility as they relate to Information Technology.

Overall we did not find the Disability Resource Center (DRC) had issues of noncompliance with laws or UC policy. We found the DRC is effectively providing affiliated students with a clear process to access needed accommodations. Students generally reported positive interactions with the center from a student survey we conducted. Further we found that the DRC webpage provides clear instructions and resources for students, staff, and faculty.

The DRC could, however, improve on its ability to identify emerging risks and effectively manage its limited resources by developing a plan to track and report key metrics for DRC-affiliated students including those related to student outcomes, student perceptions, and potential campus barriers. Developing these metrics will enable the DRC to better measure and quantify its success in serving its affiliated students while also enabling it to better identifying emerging risks or persistent barriers on campus.

In regards to risks with public accessibility with information technology, we found that the university was likely out of compliance with UC Policy IMT-1300 on Information Technology Accessibility in two ways:

- IMT-1300 requires that university websites comply with the "Web Content Accessibility Guidelines" (WCAG) 2.0, however our review of 23 UC Santa Cruz public facing webpages, found that 20 fell below the industry benchmark for education.
- IMT-1300 requires campuses to create and operate a Accessible Technology Program. UC Santa Cruz has previously drafted plans to address the requirements of IMT-1300. However, these plans have never been implemented.

The following observations requiring management corrective actions are identified below:

A. Disability Resource Center Metrics

The Disability Resource Center should create a long-term plan to collect and periodically report key metrics to the ADA Advisory Committee. .

B. Website Accessibility

The ADA compliance officer, in collaboration with ITS, should develop a method to provide oversight over UC Santa Cruz’s website accessibility.

C. Information Technology Accessibility Program

ITS should renew efforts to implement the Information Technology Accessibility Program. At a minimum, ITS should create an implementation plan.

Agreement was reached with management on all recommended actions to address risks identified in these areas. The observation and related management corrective actions are described in greater detail in section III.

II. INTRODUCTION

Purpose

The purpose of the audit was to evaluate the controls in place to ensure nondiscrimination on the basis of disability. This will involve compliance with relevant policy and laws (Americans with Disabilities Act) and procedures of various offices related to ADA compliance, including the Disability Resource Center. This audit was included on the campus FY20 Internal Audit Plan.

Background

Criteria

Accessibility and Accommodations both fall under the purview of the Americans with Disabilities Act (ADA), which is the primary criteria used in this audit. In fact, “ADA Compliance Officer” is the title of the campus’s primary individual with a role of ensuring nondiscrimination on the basis of disability. The California Fair Employment and Housing Act (Cal FEHA), also serves as criteria. Cal FEHA builds on and is more stringent than the ADA. In addition to these two laws, UC has various policies on accommodations and accessibility. The policies identified below are perhaps the most directly applicable to the subject matter of this audit, but many UC policies include provisions to ensure nondiscrimination on the basis of disability even if only found briefly in the policy.

Accommodations

UCOP Policy 140.00, “Guidelines Applying to Nondiscrimination on the basis of Disability” gives a variety of requirements for accessibility in regards to housing, programs, facilities, etc. The requirement regarding Program Accessibility is perhaps the one most university applicable to this report. This requirement states:

“No qualified individual with a disability shall be denied, on the basis of that disability, the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any of the University’s programs, services, or activities because University facilities are inaccessible to, or unusable by, individuals with disabilities. The University must make its programs, services, and activities accessible to and usable by any qualified individual with a disability, unless doing so would result in a fundamental alteration to the nature of its programs, services, and activities, or would result in undue financial and administrative burdens.”

Additionally, PPSM 81, “Reasonable Accommodation Policy and Procedures,” addresses how university employees are to be provided reasonable accommodations to otherwise qualified employees who are disabled. The policy discusses the use of the “Interactive Process” to determine what reasonable accommodations will be made.

UC Santa Cruz local policy DSS-0003, “Service/Support Animals,” addresses procedures related to animals (usually dogs) being utilized for disability accommodation services. Specific procedures for service animals and support animals differ depending on which category the animal falls into.

Accessibility

UCOP Policy IMT-1300, "Information Technology Accessibility," requires campuses to implement an Information Technology Accessibility Program with particular items such as training and awareness included. The policy also requires that university websites comply with the "Web Content Accessibility Guidelines" (WCAG) 2.0, an industry standard.

Defining Accommodation and Accessibility

While UCOP Policy IMT-1300, "Information Technology Accessibility," has a technology focus, it generally does a good job at describing the basic concept of accessibility:

"...the concept that people with disabilities are able to access and use a product or system, including with the help of assistive technologies. For example, an "accessible" Web site may be designed so that the text can be enlarged by the user, rather than having a fixed font size, or may be designed so that it can be interpreted and "read out loud" by screen reader software used by blind or low-vision people."

It is noteworthy that accessibility could be given a broader definition to include ensuring access/usability to individuals who experience barriers other than disabilities. For example, ensuring course materials have accurate descriptive captions are an example of an accessible practice as it doesn't necessarily need to be tailored for an individual and it generally improves usability for anyone looking at the material. This report will use the narrower definition of accessibility to focus on individuals with disabilities however.

While accessibility generally applies to making programs useable by wide ranges of individuals, accommodations are program modifications tailored to individuals to improve their individual access. As an example:

- Ensuring online course material have captions on images would be an example of an accessible practice as it doesn't necessarily need to be tailored for an individual while generally improving usability for anyone looking at that material.
- On the other hand, ensuring there is a sign language interpreter present in a classroom with a deaf or hard-of-hearing student would be an example of a reasonable accommodation, as the effort is geared towards improving the usability for a specific student.

In practice, the primary difference between accessibility and accommodations is that accommodations involve a process by which individuals need to specifically request modifications, receive approval, and the campus needs to implement these modifications. On the other hand, accessibility does not have such a discrete process, but rather has a more iterative one as the campus tries to make materials more accessible over time.

The University has formalized processes to process and provide these accommodations based on the nature of the relationship with the university. Each of these processes falls under the purview of a specific "access coordinator" which is described in the next section on roles and responsibilities.

Roles and Responsibilities

Roles and responsibilities associated with ensuring nondiscrimination on the basis of disability is a somewhat distributed responsibility on this campus. While the ADA compliance officer has the campus-wide leadership role of ensuring that UCSC has appropriate accommodation and investigation/complaint processes and procedures in place, there are a number of access coordinators with the role of processing and ensuring access and/or accommodations to individuals based on the nature of the relationship with the university. In addition, there are committees including the ADA Advisory Committee and the Accessible Technology Committee which play a role in ensuring nondiscrimination on the basis of disability.

Below is a summary of these various players:

Overall Oversight

- The **ADA compliance officer** has the overall campus-wide leadership role of ensuring that UCSC has appropriate accommodation and investigation/complaint processes and procedures in place. This role also ensures coordination between the various accessibility coordinators. The Americans with Disabilities Act and the California Fair Employment and Housing Act (CAL FEHA) are perhaps the most important criteria which the ADA compliance officer needs to ensure the university is in compliance with.
- The ADA compliance officer hosts periodic **ADA Advisory Committee meetings**. This meeting brings together the various access coordinators and is used to share information regarding ADA matters to the various key players.
- The **Accessible Technology Committee (ATC)** was originally charged with an oversight role over the campus's IT Accessibility Program, however the charge of the ATC has since changed to serve as a common interest group on IT accessibility matters. The committee meets roughly monthly and is composed of members from across campus with an interest in IT accessibility.

Access Coordinators

- The **ADA public access coordinator** has the role of ensuring visitor and guest accommodation requests are addressed. Currently the campus ADA compliance officer also fulfills this role. Generally speaking, the public access coordinator acts in an oversight role to ensure these requests are coordinated with the appropriate departments that directly handle the requests.
- The **ADA program access coordinator** has the role of ensuring student accommodations requests are addressed. The director of the Disability Resource Center (DRC) holds this role as the mission of DRC directly ties to student accommodations.
- The **IT accessibility coordinator** has the role of promoting the development and implementation of accessible information technology for the campus websites and other information technology. The IT accessibility coordinator is also the chair of the Accessible Technology Committee.
- The **disability management coordinator** has the role of ensuring staff reasonable accommodation requests are addressed. For the purposes of this role, staff includes faculty, and student employees, including graduate students receiving state funding.

- The **ADA facilities access coordinator** oversees administration and compliance for the campus's capital program.

Other Key Players

- The **Disability Resource Center (DRC)** goal is "...to support retention and graduation of students with disabilities, promote a non-discriminatory campus environment, and encourage student development and independence."¹ The DRC serves enrolled UCSC students by managing accommodation requests for students with permanent disabilities to about 2,500 students a year. Likewise they also serve students with temporary medical conditions.
- **Instructors and managers** are ultimately the individuals who must ensure reasonable accommodations are implemented for students and employees respectively.

Campus Climate Survey

The 2018 "University of California Undergraduate Experience Survey (UCUES)" provided useful information regarding the overall campus climate related to individuals with disabilities. The UC system website gives a description of the survey:

"The University of California Undergraduate Experience Survey (UCUES) is a biennial survey conducted at UC's nine undergraduate campuses. It provides valuable information about student behaviors such as their use of time working, studying, socializing, and participating in campus activities; their level of academic engagement such as how much course material they read, classroom participation, and collaborative learning; their self-ratings of academic and interpersonal skills; and their involvement in community service. Results are used to better understand the academic and co-curricular experiences of students, assist with program evaluations, assess financial aid packages, and understand campus climate."

The 2018 UCUES survey had a number of notable findings that UCSC's Institutional Research, Assessment, and Policies Studies office (IRAPS) curated and reported to the UCSC ADA compliance community. Among these notable findings were:

- The survey found that only 31% of students with a physical disability and only 37-38% of students with a learning or cognitive disability agreed that students like them are respected at UCSC (while 26% of students with physical disabilities and 21-22% with learning or cognitive disabilities DISAGREED that they felt respected on campus).
- UCSC has a much higher (39% vs 29%) rate of students with Mental/Emotional Disabilities that impact their experience as a student than those from other UCs. This trend is true across various racial/gender demographics

¹ From the DRC's website in the "About Us" page.

- UCSC has reported higher rates of hearing negative stereotypical views about their disability and students report feeling less inclusiveness regarding their disability than other UCs.

The UCUES surveys are a valuable tool that can be used by campus leaders and professionals who work in disability matters on campus to guide decisions. The survey has a very high response rate, good granularity, and allows comparisons both among campuses and over time. A summary of some of these findings curated by UCSC's IRAPS can be found in **Appendix C**.

Scope

During the audit, we reviewed controls the University uses to ensure nondiscrimination on the basis of disability.

- We reviewed existing formal or informal policies at UC Office of the President, UC Santa Cruz, other UC system locations, and local divisional policy.
- We interviewed the ADA compliance Officer, disability access coordinators, and various other key players.
- We reviewed correspondence between the Academic Senate and DRC.
- We reviewed web resources provided to students, staff, faculty, and the public.
- We conducted analysis using Siteimprove to determine accessibility for 23 major public facing UCSC websites. We also conducted manual accessibility checks on these sites.
- We attended committee meetings for Accessible Technology and the ADA advisory committee.
- We reviewed financial transactions and funding for accommodations.
- We conducted a student survey for students with an affiliation with the Disability Resource Center to understand potential areas of risk.
- We reviewed UC demographic climate data.

III. OBSERVATIONS REQUIRING MANAGEMENT CORRECTIVE ACTION

A.	Disability Resource Center Metrics					
<p>We found that the Disability Resource Center (DRC) is effectively providing affiliated students with a clear process to access needed accommodations and these students generally report positive interactions with the center. The DRC could, however, improve on its ability to identify emerging risks and effectively manage its limited resources by developing a plan to track and report key metrics for DRC-affiliated students including those related to student outcomes, student perceptions, and potential campus barriers.</p>						
Risk Statement/Effect						
<p>Without an effective way to use data metrics, the DRC may find it difficult to measure and quantify its success in serving its affiliated students. Furthermore, without the use of data metrics, the DRC might have difficulty identifying emerging risks or persistent barriers on campus.</p>						
Agreement						
A.1	<p>The Disability Resource Center will create a long-term plan to collect and periodically report key metrics to the ADA Advisory Committee. At a minimum these metrics should include:</p> <ul style="list-style-type: none"> a) Student Outcomes. For example, measuring the graduation rates between DRC-affiliated vs non-affiliated students. b) Student Perceptions. For example, conducting periodic surveys of DRC-affiliated students. c) Potential Campus Barriers. For example, tracking longer term trends such as any significant change in accommodation useage in different divisions. 	<table border="1"> <tr> <td data-bbox="1170 865 1479 926">Implementation Date</td> </tr> <tr> <td data-bbox="1170 926 1479 987">08/01/2020</td> </tr> <tr> <td data-bbox="1170 987 1479 1050">Responsible Manager</td> </tr> <tr> <td data-bbox="1170 1050 1479 1348">Director, Disability Resource Center</td> </tr> </table>	Implementation Date	08/01/2020	Responsible Manager	Director, Disability Resource Center
Implementation Date						
08/01/2020						
Responsible Manager						
Director, Disability Resource Center						

A. Disability Resource Center Metrics

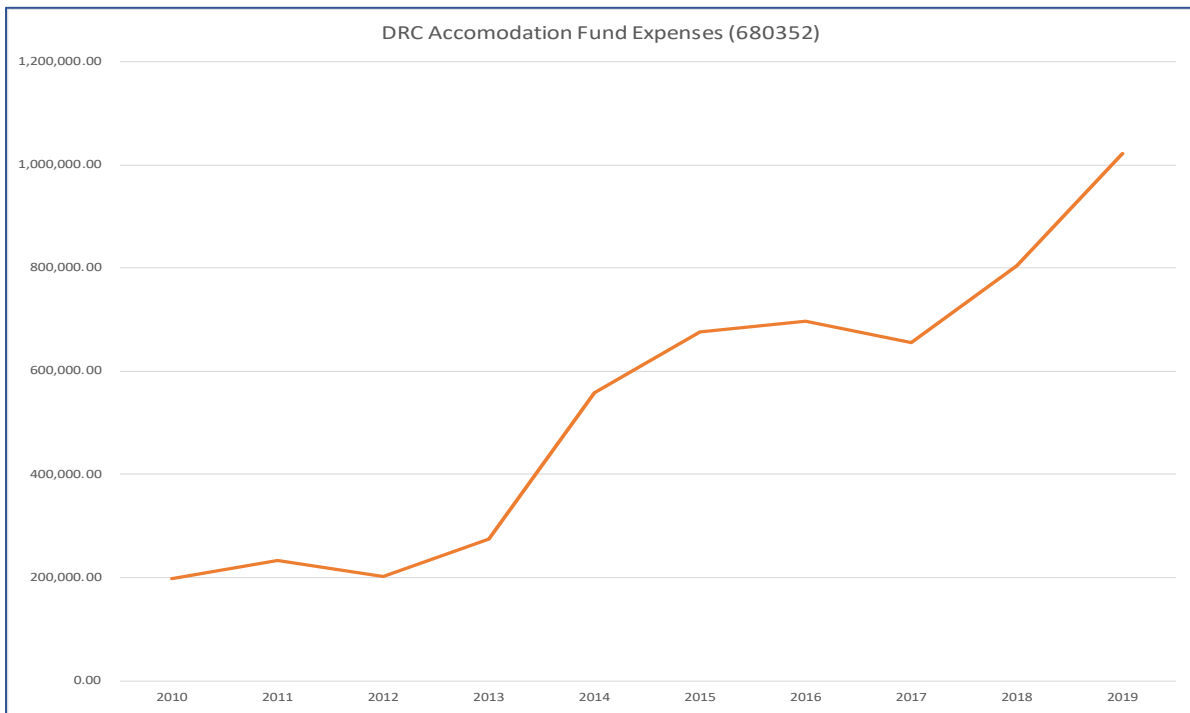
Overall, we found the Disability Resource Center (DRC) is effectively providing affiliated students with a clear process to access needed accommodations. Further we found that the DRC webpage provides clear instructions and resources for students, staff, and faculty. We did not find any DRC issues of noncompliance with laws or UC policy. The DRC could, however, improve on its ability to identify emerging risks and effectively manage its limited resources by developing a plan to track and report key metrics for DRC-affiliated students including those related to student outcomes, student perceptions, and potential campus barriers. Specifically, we summarized our findings into five topic areas:

- Financial Review
- Accommodation Process

- Roles and Responsibilities
- Student Survey Results
- Data Metrics

Financial Review

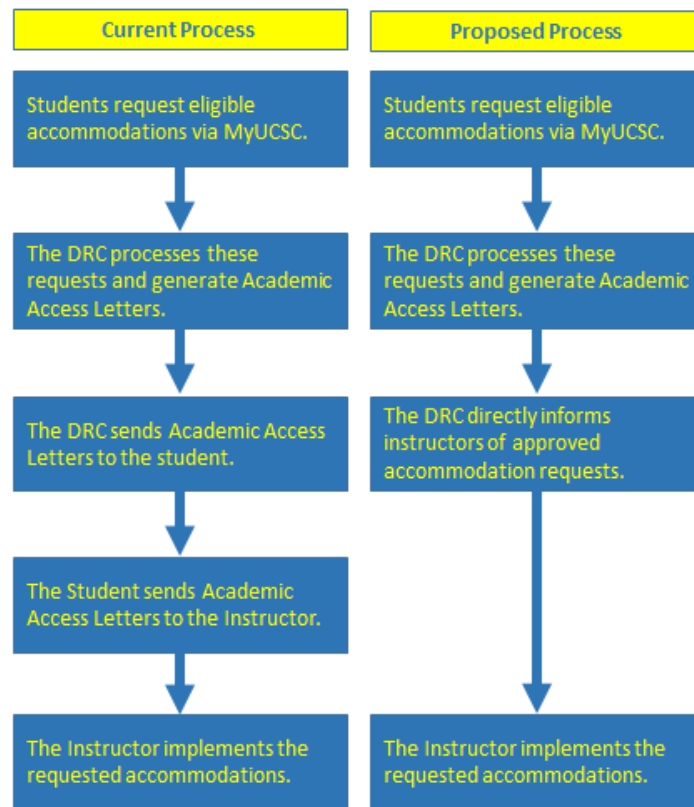
We reviewed two ORG code FOAPALS in our review of DRC’s finances: 680350 for DRC Administration and 680352 for DRC Accommodation Fund. We did not find any indicators of fraud, waste, or abuse in our review. It is noteworthy that the DRC Accommodation Fund expenses have grown significantly over the last decade. Total expenses in the 680352 ORG code for accommodation funding have grown from \$198K in FY10 to over \$1.02 million in FY19, a growth of over 415% in that ten year period. This growth in accommodation fund expenses reflect the growth in student accommodation requests at UC Santa Cruz and mirror the trends nationally.



Accommodation Process

The process to request accommodations for students is logical and the DRC website has step-by-step processes clearly laid out for students. In short, students contact the DRC to become affiliated with the organization and identify applicable accommodations in which the student is eligible. Each quarter students go to the MyUCSC portal to select the accommodations they would like to apply to enrolled courses. The DRC then process these requests and generates an “Academic Access Letter.” These letters are provided to the students, who in turn are responsible to provide them to their instructors.

The DRC has discussed with the Academic Senate the possibility of changing this process to have these letters sent out directly from the DRC to the instructors in order to simplify the process and to allow better privacy. Below is a summary of the current and proposed process:



Additionally, the DRC website includes plenty of information for students interested in filing a complaint. In short, for disability-related complaints regarding accommodations, students are encouraged to work first with the ADA program access coordinator. If the matter remains unresolved then the student should contact the ADA compliance officer who has ultimate responsibility and authority to resolve the concerns and offer a reasonable accommodation. If the student believes the matter is still not resolved satisfactorily, then the ADA compliance officer will provide the student with information on filing a formal grievance via the campus Policy on Student Grievance Procedures and filing a complaint with the U.S. Department of Education, Office of Civil Rights.

Roles and Responsibilities

As mentioned in the background section, the Disability Resource Center's role is "...to support retention and graduation of students with disabilities, promote a non-discriminatory campus environment, and encourage student development and independence." In order to achieve its goals, the DRC must effectively coordinate among students, instructors, and other university departments. To this end, the DRC webpage does a good job at laying out the roles, responsibilities, and processes for its various stakeholders.

One page in particular under the "Faculty and Staff" section of the website lays out the roles for the DRC, students, faculty, and staff.² The DRC may want to consider providing a link to this page in the student section as well, as the page is quite helpful for all individuals to know what everyone's specific responsibilities are in the process.

Presently, coordinating and providing exam accommodations, such as extending time, is the responsibility of the instructor and these accommodations make up a large percentage of the overall accommodations requested. The university does not currently centrally manage testing spaces or provide proctor/TA resources for testing accommodations. The Academic Senate's Executive Committee (SEC) has expressed some concern with the ultimate responsibility for these accommodation request and the SEC has indicated that "the administration should provide adequate testing space and proctors for students with DRC accommodations." Many universities have centralized testing facilities to alleviate some of these sorts of concerns. However, allocating space or constructing a new facility for testing space would certainly involve a significant allocation of campus resources. Campus leadership ultimately has the authority to decide how to allocate its scarce resources to balance the many risks the university experiences.

In order for the DRC to be able to fulfil its mission, it must have knowledgeable employees and be adequately staffed. To this end, the DRC has had some challenges, for example the DRC has lost three staff members in calendar year 2019 and often has vacancies left unfilled for significant periods of time. While there are multiple reasons for turnover and vacancies, it is likely that relatively low salaries and a high cost of living in the Santa Cruz area are a contributing factor to the turnover. This is unfortunately a problem not isolated to the DRC - UC Santa Cruz generally experiences problems associated with having lower salaries on average than its UC peer institutions. A 2018 Campus Welfare Committee report notes that the campus lags behind the market in overall levels of base pay for non-represented staff. It specifically found that 83 percent of campus staff it reviewed were below the mid-point in their career tracks salary range. Locally, the DRC has an added challenge of competing for staff with other compliance related offices, such as the Title IX Office.

Survey Results

We created a student survey which the DRC then sent out to all undergraduate and graduate students that are affiliated with the DRC. Two hundred and one students completed the survey. While the survey was anonymous, it did collect two pieces of demographic data: class cohort and the student majors. The survey results are presented in table form in **Appendix B** of this report.

Overall, the results of the survey were quite positive. The survey found that:

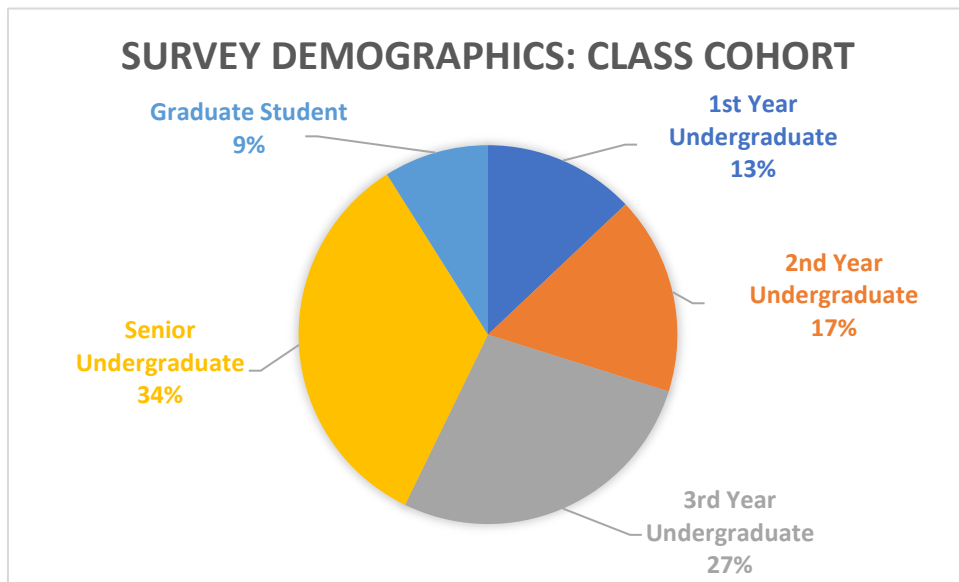
² Specifically from: <https://drc.ucsc.edu/faculty-and-staff/fac-staff-overview/roles-responsibilities.html>

- the majority of students reported a relatively clear process to request and receive accommodations.
- the majority of students reported relatively little difficulty in receiving the classroom accommodations they requested.
- the accommodations requested generally fit the needs of the students.
- students generally had a good, but not excellent, view of how knowledgeable instructors were at managing accommodations.
- respondents had an overwhelmingly positive view of the DRC.

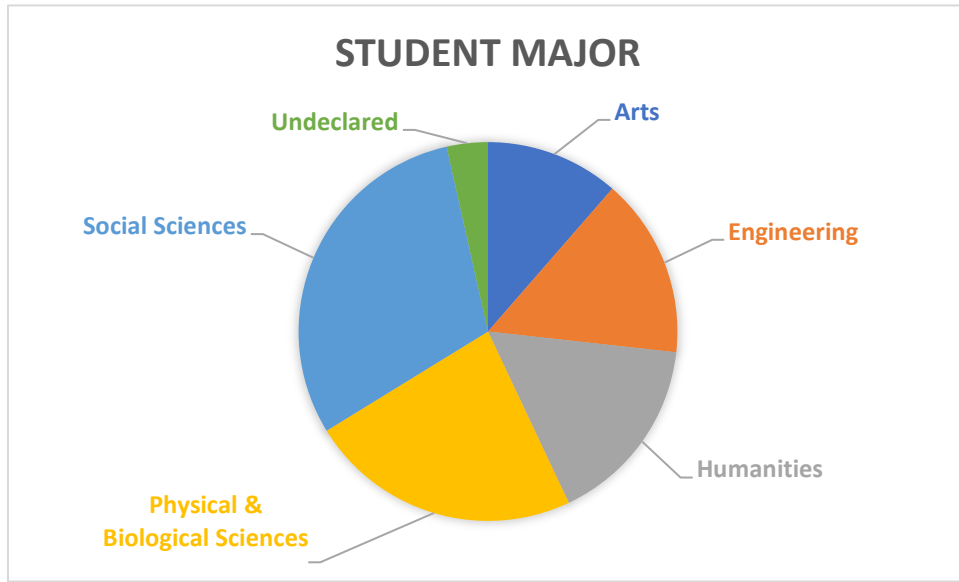
It is important to note that, while 201 responses are a fair number to see overall trends in the data, readers should be careful when comparing details by cohort or major. For example, 1st year undergraduates are relatively underrepresented in the survey, with only 26 total responses for this category. If one wanted to narrow this down further by a given major, there might only be a handful of responses for any given major who are also 1st year undergraduates.

Additionally, one should be careful not to draw too many conclusions from the data without further context. For example, even though the majority of students reported relatively little difficulty in receiving the classroom accommodations they requested, the data does not distinguish between types of accommodations requested or the degree of difficulty some students may have faced. It is possible, for example, that the relatively low percentage of individuals expressing difficulty in receiving accommodations could be driven by the large number of requests for relatively straightforward accommodations, such as extended time on exams, rather than the campus doing a universally good job at handling all accommodation requests.

The first chart (below) shows the class cohort of the survey respondents. The survey responses were slightly skewed towards 3rd year and senior undergraduates with a total of 61% of responses being in one of these two categories.



The next chart below shows the distribution of student majors. Within the 201 responses, 177 students reported one major, 21 reported double majors, and 3 students reported triple majors.

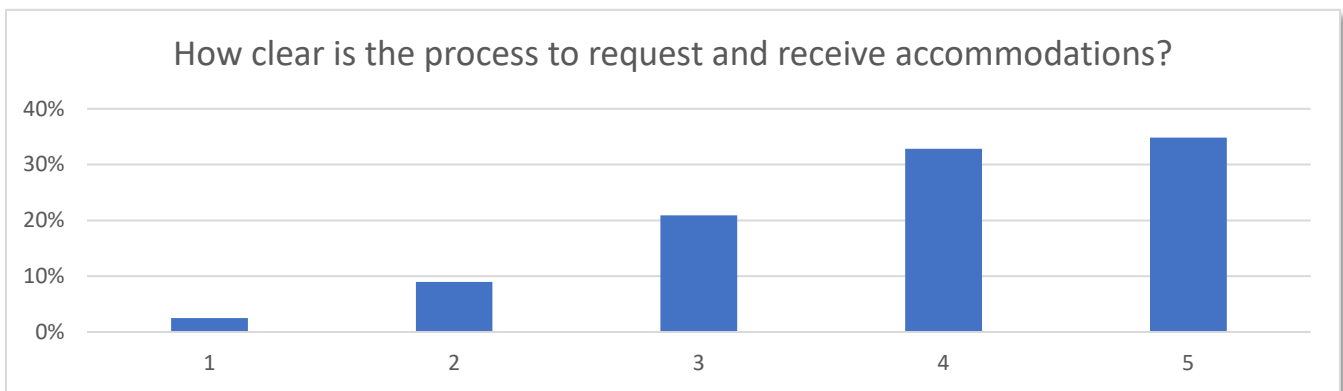


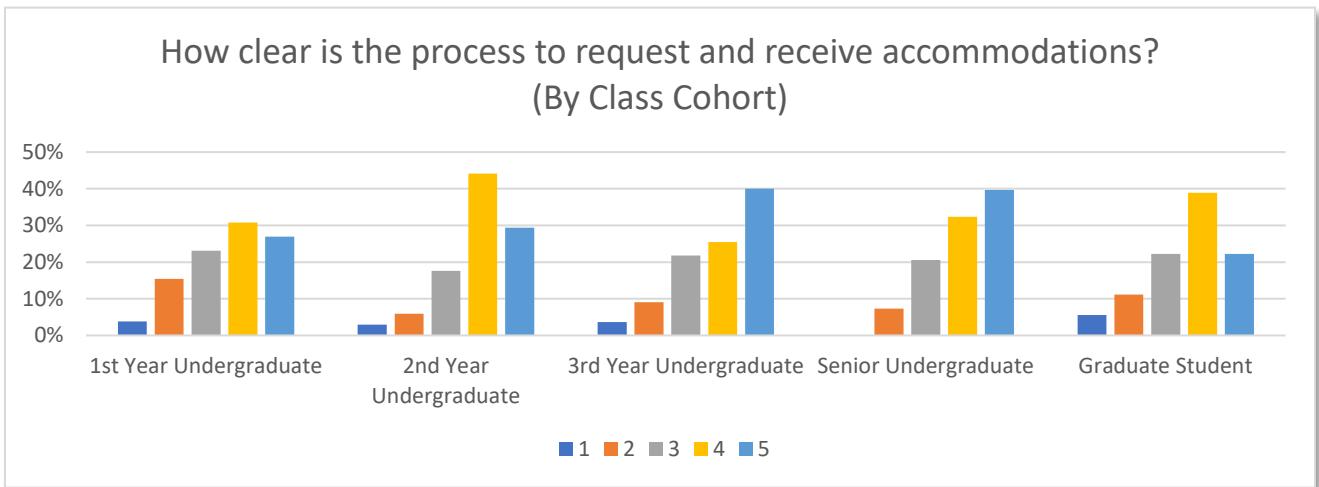
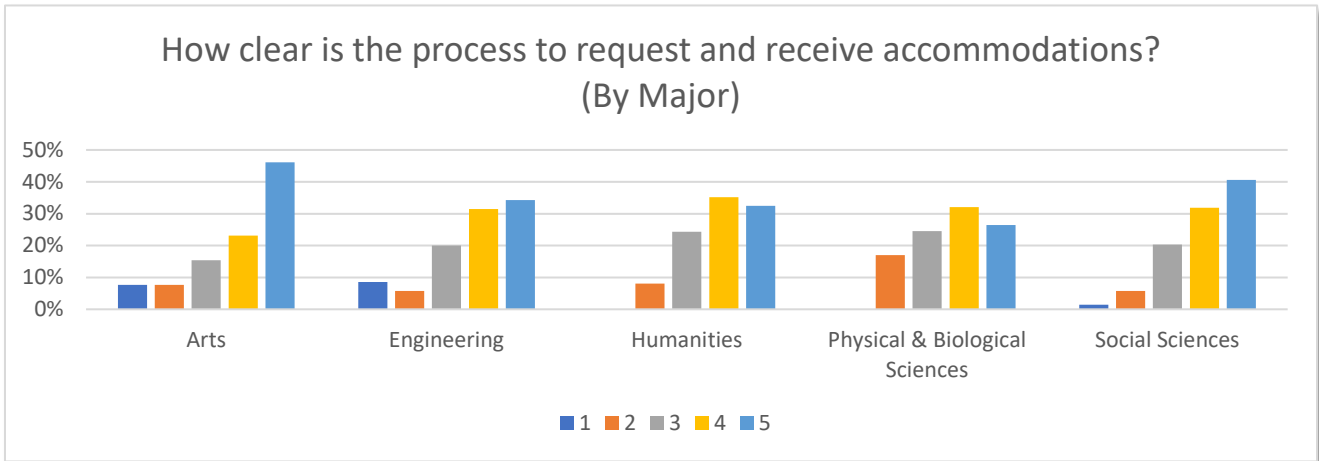
1st Question: How clear is the process to request and receive accommodations?

Overall, the survey found that the majority of students reported a relatively clear process to request and receive accommodations. 68% of students reported either a 4 or 5 out of 5 in clarity of the process (see key to the right) while about 11% gave it a 1 or 2. Somewhat logically, 1st year students had lower scores for this question with about 19% of 1st year students reported a 1 or 2.

Response Key
Rating of 1 – Very unclear - it is difficult to know how to navigate the process.
Rating of 5 – Very clear - the process is easy to navigate.

The charts below shows the detailed results for this question:





2nd Question: Have you ever experienced difficulty in receiving classroom accommodations?

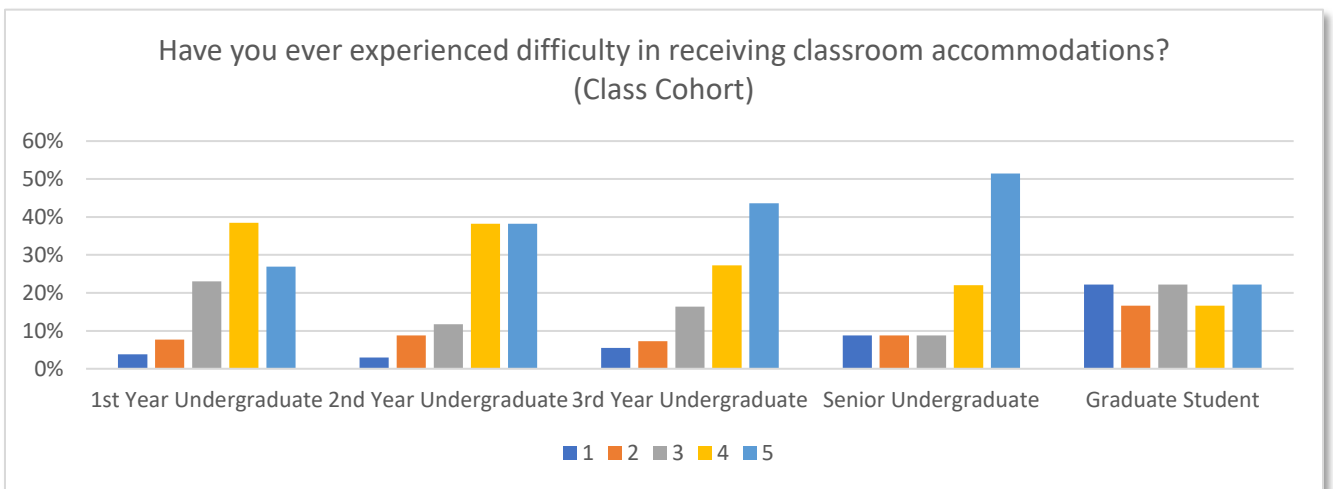
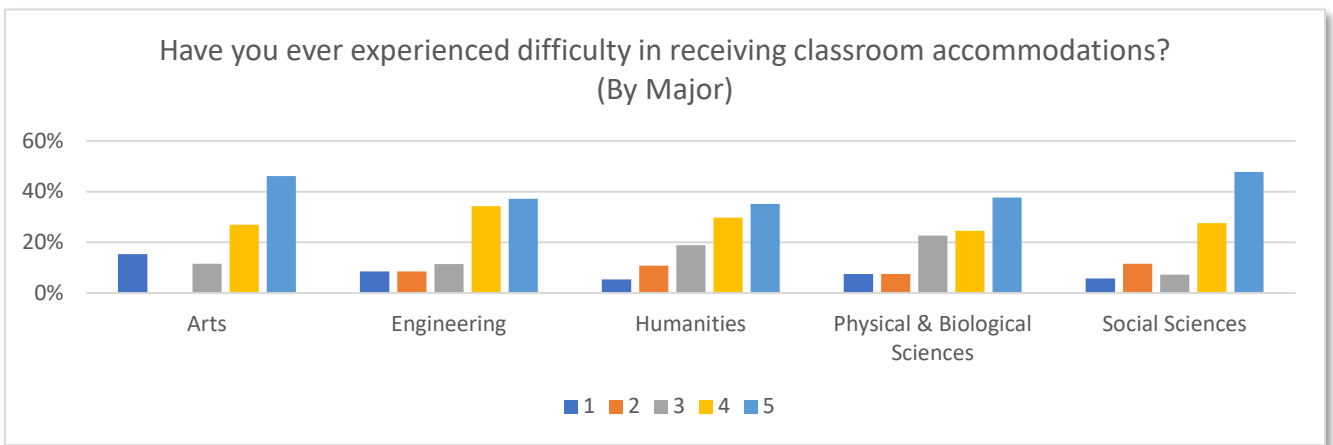
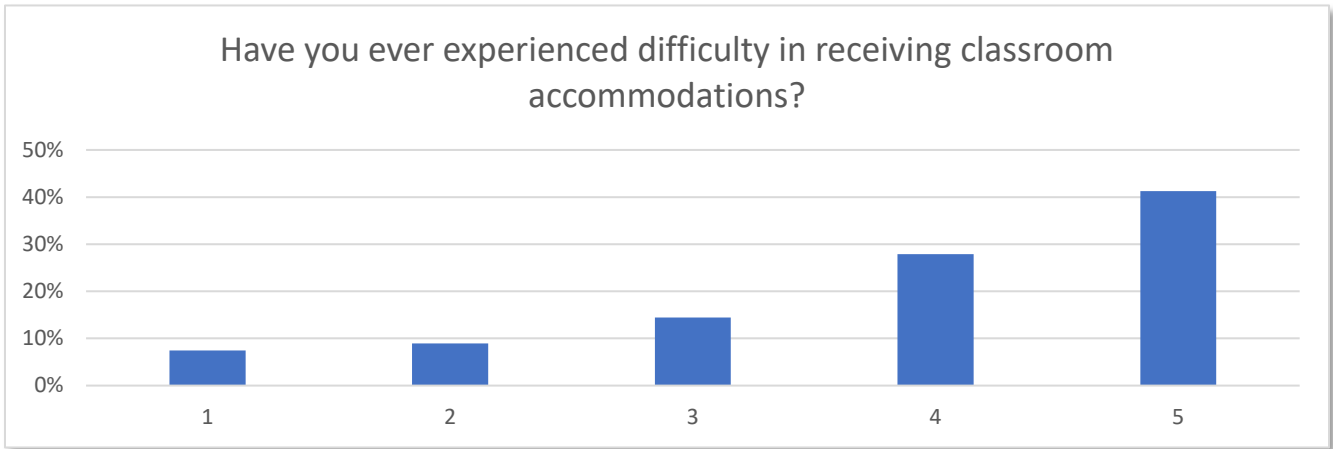
Overall, the survey found that the majority of students reported relatively little difficulty in receiving the classroom accommodations they requested. 69% of students reported either a 4 or 5 out of 5 in the ease of the process (see key to the right). 16% of students however did report a 1 or 2 with a 1 representing common difficulty in receiving accommodations.

Response Key

Rating of 1 – Commonly have difficulty.

Rating of 5 – Rarely, if ever, have experienced difficulty.

The charts below show the detailed results for this question:

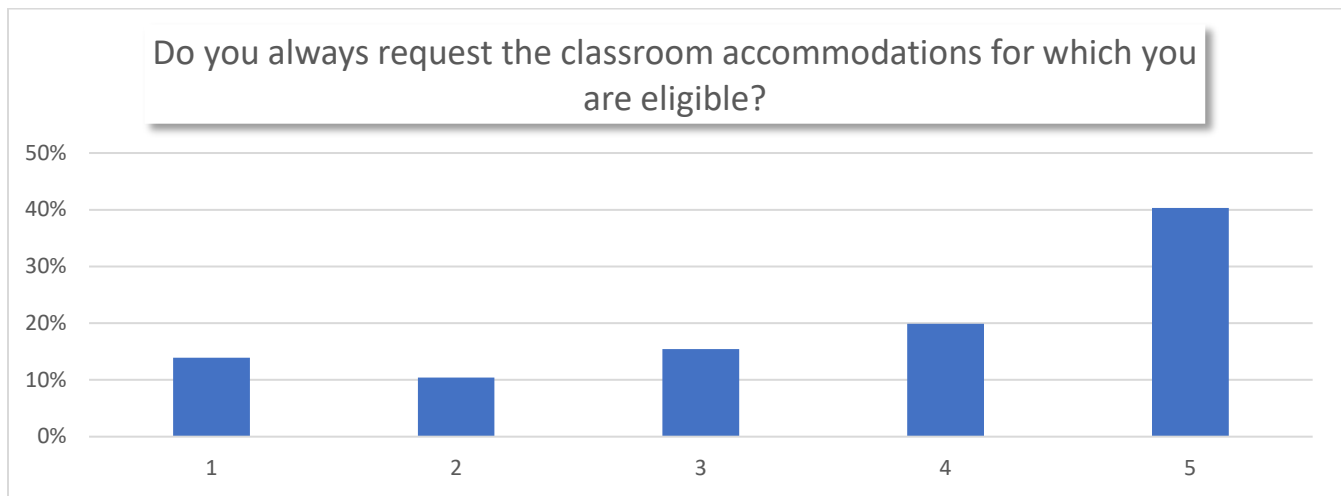


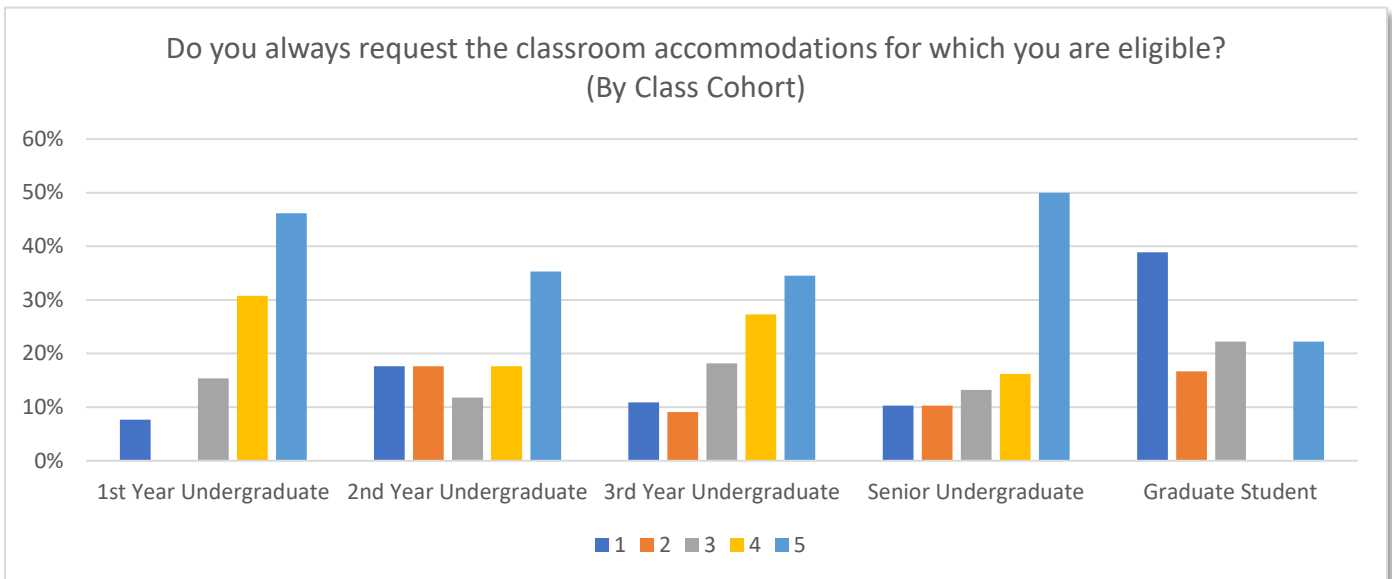
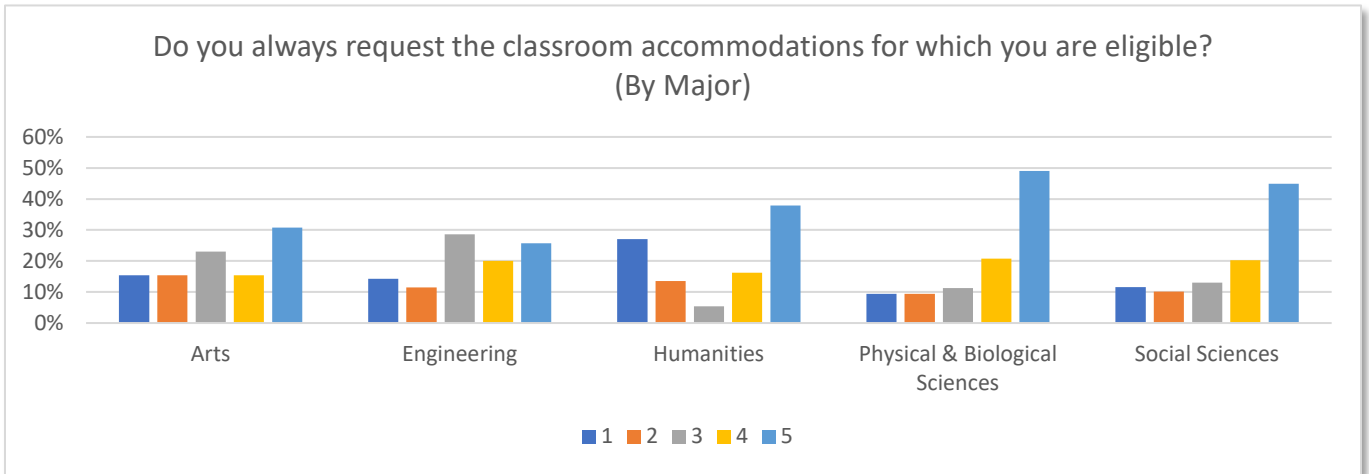
3rd Question: Do you always request the classroom accommodations for which you are eligible?

Overall, the survey found a somewhat bimodal response to this question in that while the majority of students do usually apply for accommodations (60% reported a 4 or 5), quite a large number also often do not apply (24% reported a 1 or 2). Students who are Physical and Biological Science or Social Science majors reported a much higher rate of always applying for accommodations than other divisions. Causality cannot be determined from this survey, but a number of potential factors could play a role in why this trend exists – for example the differing nature of coursework or exam structure may play a role in the frequency accommodations are requested. It should be noted that the scores on this particular question by themselves indicate a positive or negative situation. For example, students could be requesting fewer accommodations because they are not experiencing as many barriers as they might expect; alternatively, they might not be requesting accommodations due to negative social pressures. Similarly, high scores on this question could indicate high numbers of classroom barriers that require accommodations to navigate; or might simply mean that instructors are especially welcoming towards accommodations.

Response Key
Rating of 1 – I rarely or never apply.
Rating of 5 – I almost always apply.

The charts below show the detailed results for this question:





4th Question: How well do the classroom accommodations you receive meet your needs?

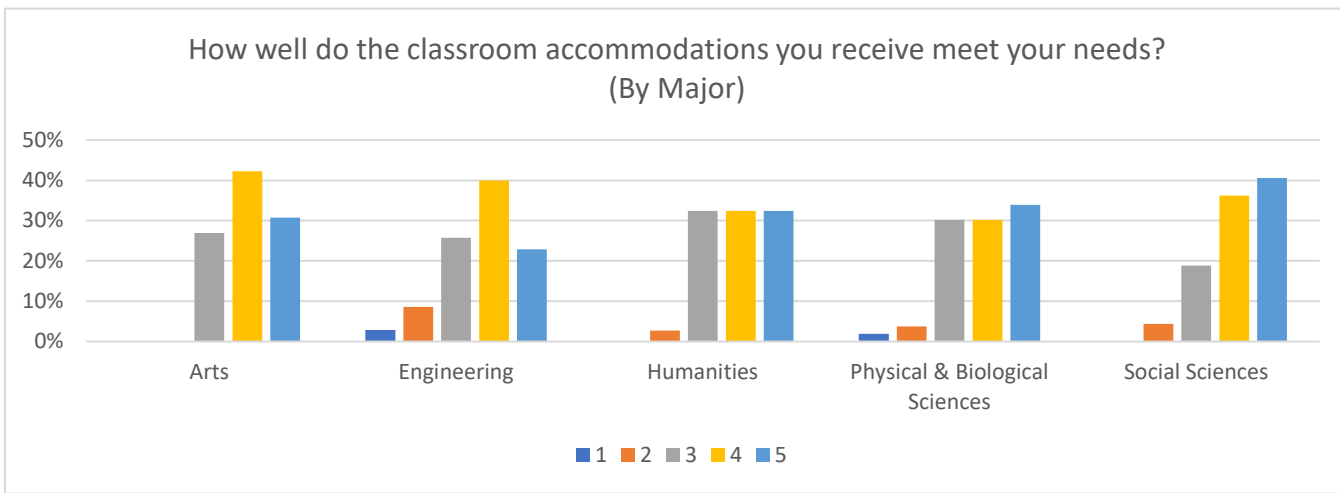
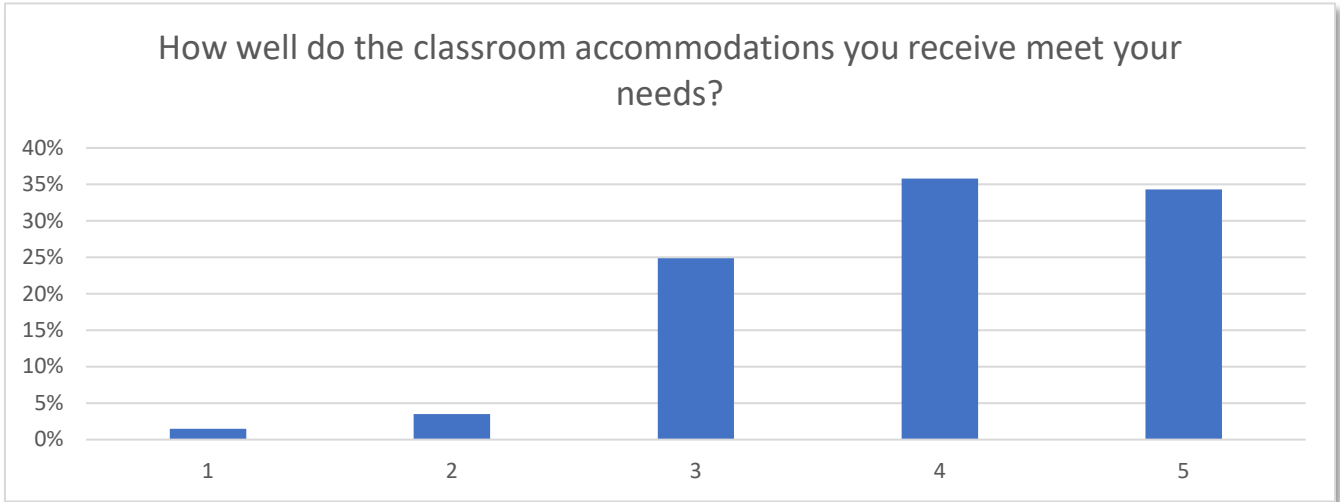
Overall, the survey found that the accommodations requested generally fit the needs of the students. 70% of students reported a 4 or 5 out of 5 in terms of accommodations fitting their needs, while only 4% of students reported a 1 or 2 that would reflect accommodations poorly fitting their needs.

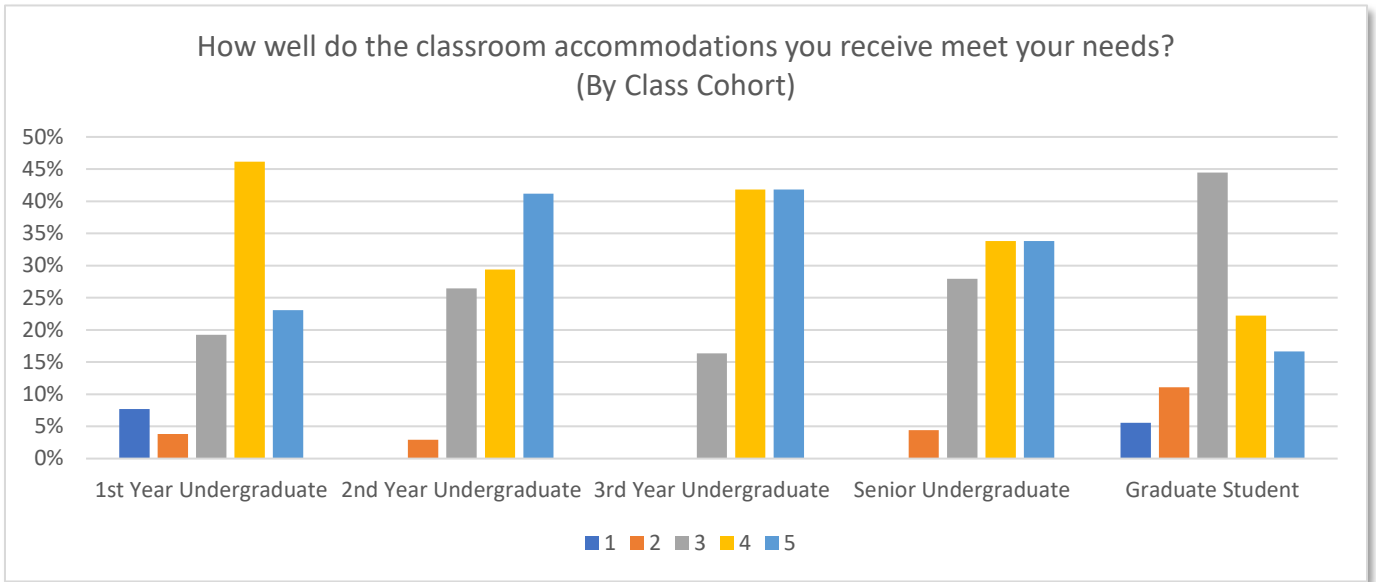
The charts below show the detailed results for this question:

Response Key

Rating of 1 – The accommodations poorly fit my needs.

Rating of 5 – The accommodations perfectly fit my needs.





5th Question: Do you believe instructors are adequately knowledgeable on managing accommodations?

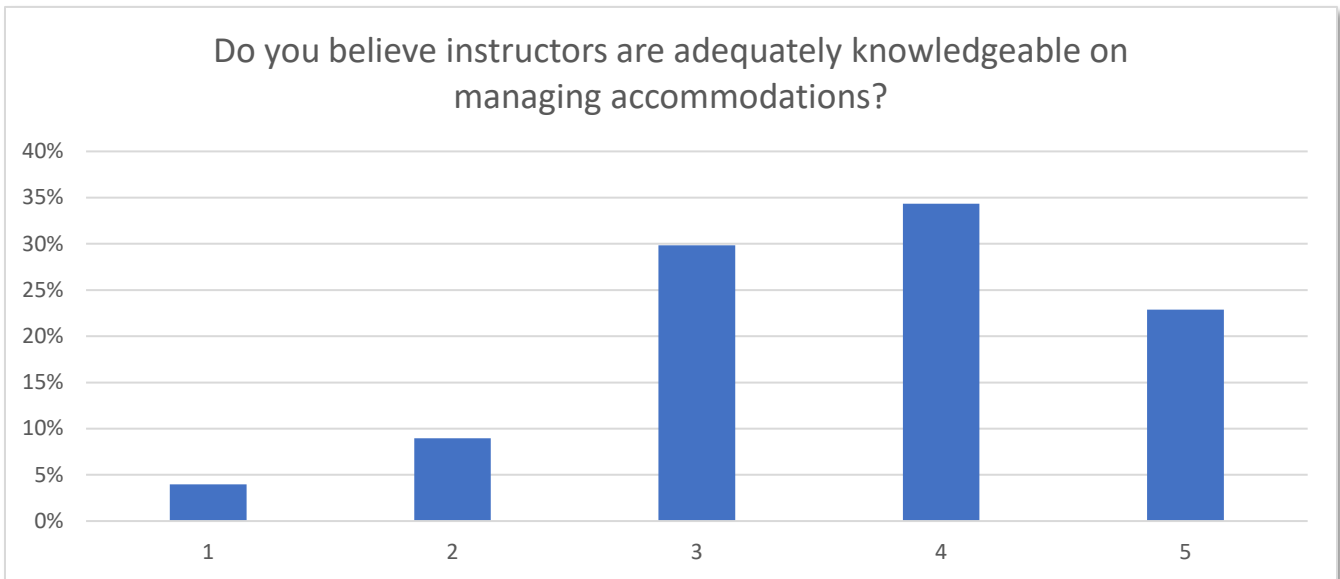
Overall, the survey found that students generally had a good, but not excellent, view of how knowledgeable instructors were at managing accommodations. Specifically, the majority (64%) of students responded with a 3 or 4 out of 5 in terms of instructor knowledge on managing accommodations.

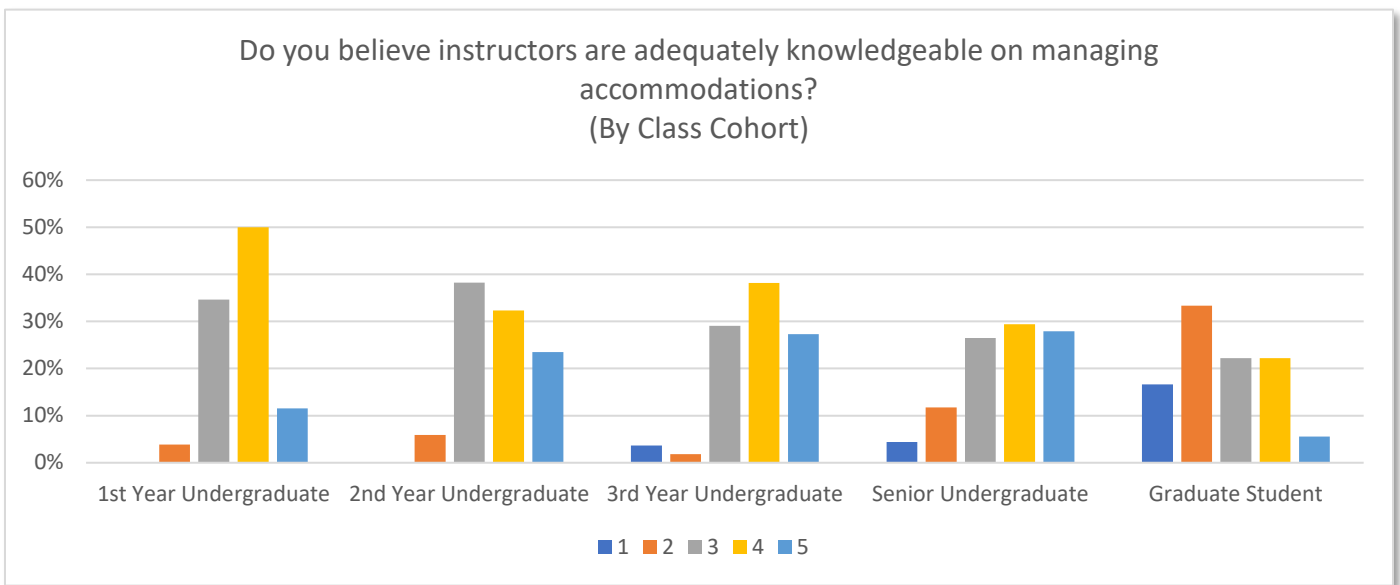
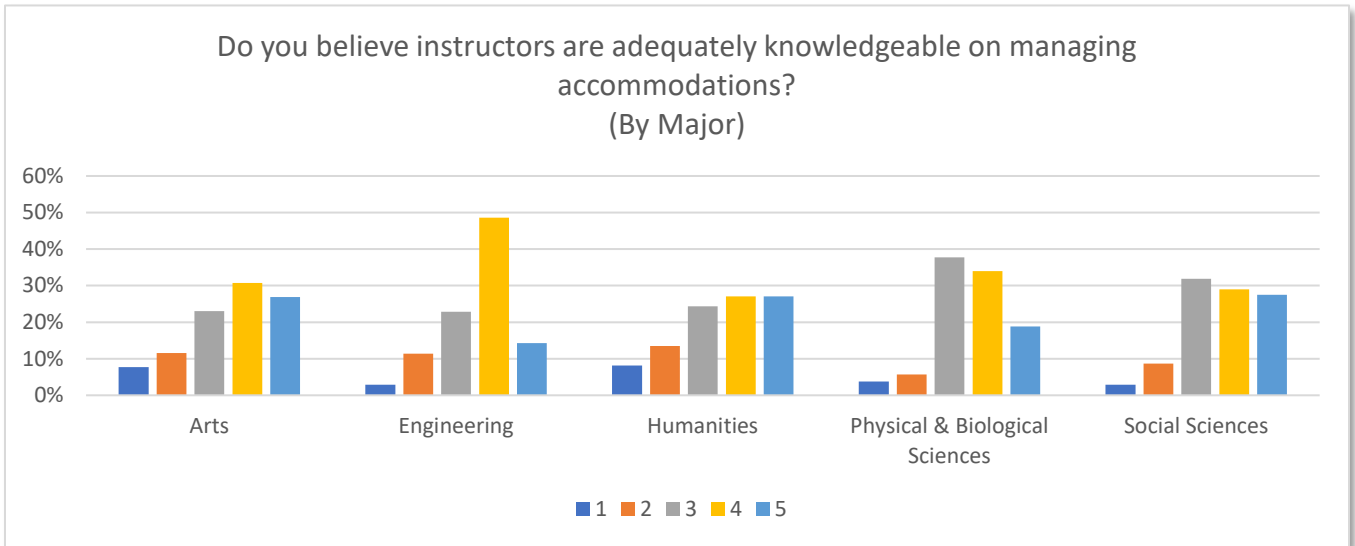
Response Key

Rating of 1 – Not at all knowledgeable.

Rating of 5 – Perfectly knowledgeable.

The charts below show the detailed results for this question:





6th Question: How would you rate your overall experience with the Disability Resource Center?

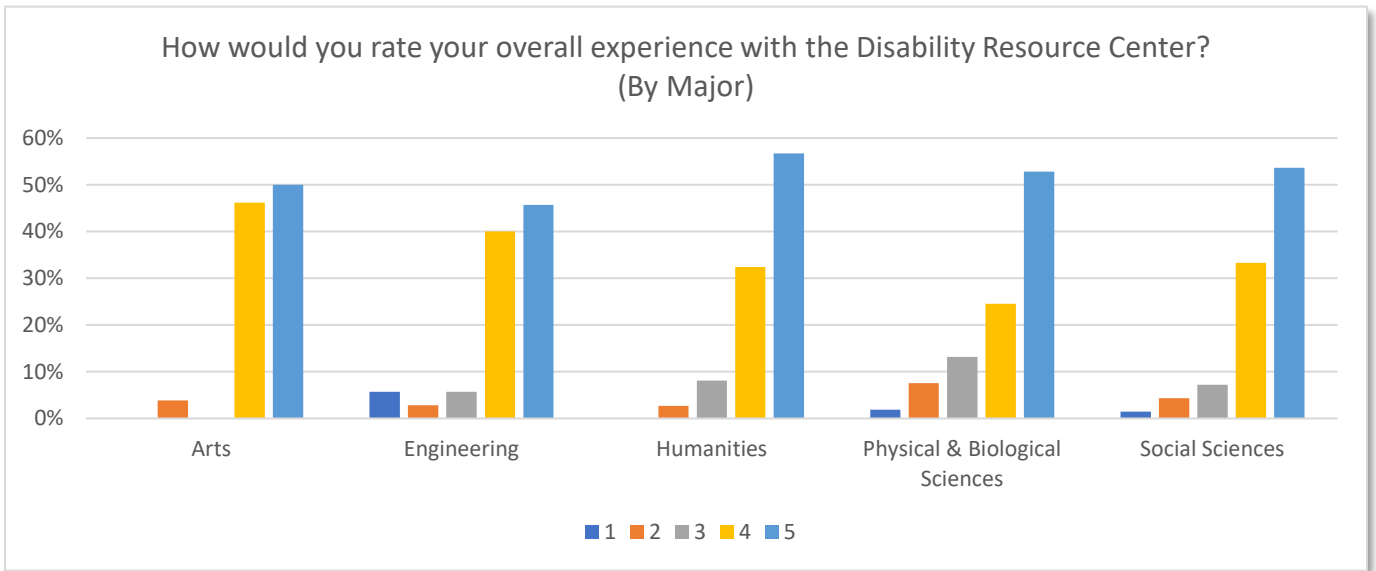
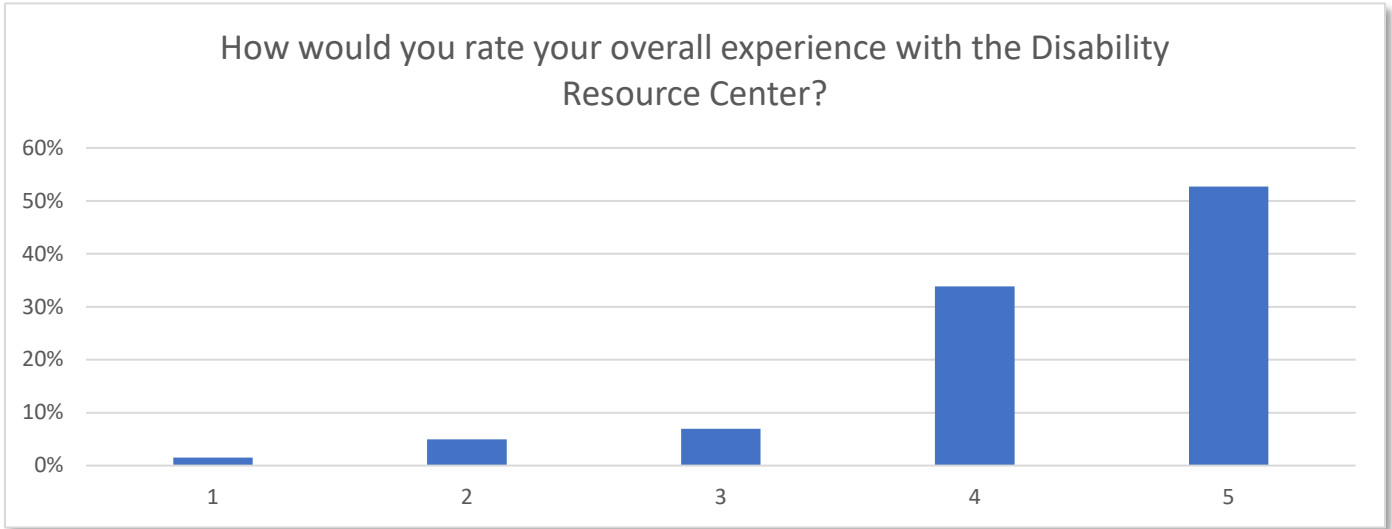
Overall, the survey found that the respondents had an overwhelmingly positive view of the DRC. Specifically, 87% of respondents gave a 4 or 5 out of 5 with 5 representing the most positive view of the DRC.

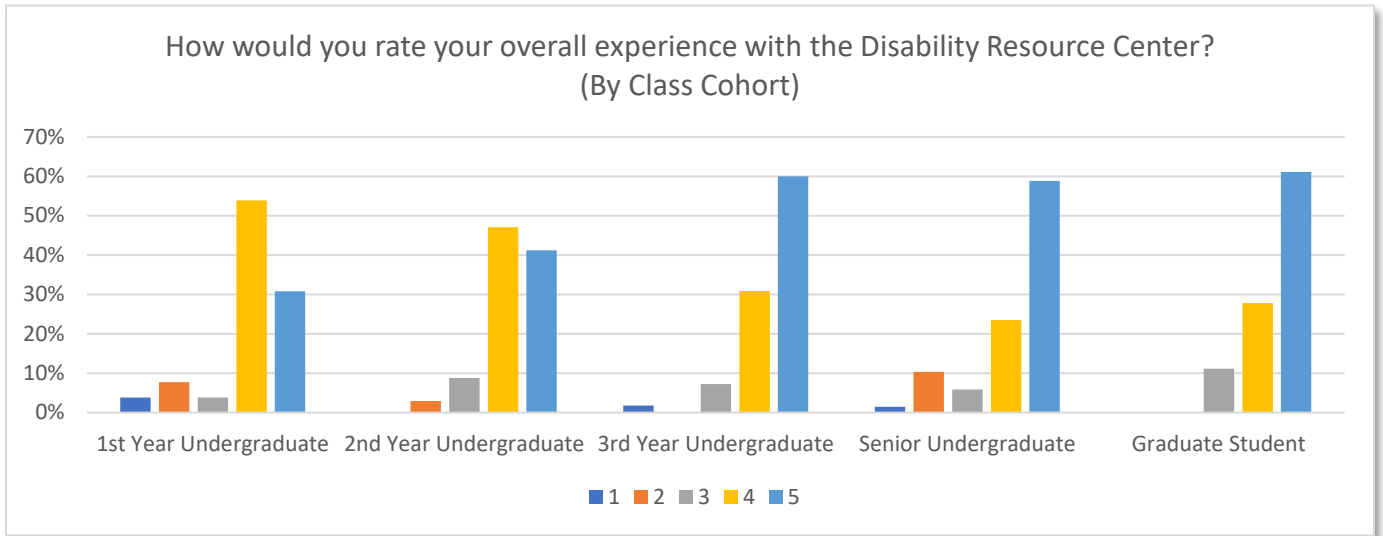
The charts below show the detailed results for this question:

Response Key

Rating of 1 – Very Negative.

Rating of 5 – Very Positive.





Data Metrics

Data metrics are an extremely valuable tool for organizations to identify emerging risks and measure success. In the DRC’s case, they theoretically have the ability and access to all sorts of data related to DRC affiliated students. For example, the DRC could build reports to measure how well DRC affiliated students are graduating when compared to the student body as a whole, or determine if students in particular divisions are experiencing barriers.

Currently the DRC is not tracking these sorts of metrics in a meaningful way. Without the use of these metrics the DRC may find it difficult to measure and quantify its success in serving its affiliated students. Furthermore, without the use of data metrics, the DRC might have difficulty in identifying emerging risks or persistent barriers on campus.

While creating these types of reports certainly take resources such as the staff time and expertise in writing the queries, the DRC could leverage other campus resources such as the IRAPS office to assist them in generating effective reports. The DRC could also implement these data metrics over a period of time (rather than all at once) and start by implementing “low hanging fruit” such as by sending out and tracking simple and uniform feedback surveys to students and plot results over time and/or by academic division.

While we did not find the DRC to be out of compliance with any UC policy or legal requirement for collecting data metrics, we believe the development of a long-term plan to gather and report this data should reduce the risk to the university by allowing it to see potential emerging areas of compliance risks. Therefore, the DRC should create a long-term plan to collect and periodically report key metrics to the ADA Advisory Committee. At a minimum these metrics should include:

- a) Student Outcomes. For example, measuring the graduation rates between DRC-affiliated vs non-affiliated students.
- b) Student Perceptions. For example, conducting periodic surveys of DRC-affiliated students.
- c) Potential Campus Barriers. For example, tracking longer term trends such as any significant change in accommodation usage in different divisions.

B. Website Accessibility		
Of the 23 websites reviewed, 20 fall below the industry benchmark for education.		
Risk Statement/Effect		
By falling below the industry benchmark, UCSC is out of compliance with IMT-1300, which requires that university websites comply with the "Web Content Accessibility Guidelines" (WCAG) 2.0.		
Agreement		
B.1	The ADA compliance officer, in collaboration with ITS, should develop a method to ensure oversight over UC Santa Cruz’s website accessibility.	Implementation Date
		07/01/2020
		Responsible Manager
		ADA Compliance Officer

B. Website Accessibility

UC Policy IMT-1300 requires that university websites comply with the "Web Content Accessibility Guidelines" (WCAG) 2.0, however our review of 23 public-facing UCSC webpages, found that 20 fell below the industry benchmark for education. In our opinion this broad result of university websites falling below the benchmark puts UC Santa Cruz out of compliance with IMT-1300.

In 2018, UC signed a three-year systemwide contract with Siteimprove for a web accessibility checker tool. Purchase of the tool for all UC locations was fully funded by Risk Services at the UC Office of the President. Siteimprove is a web management tool that routinely scans designated websites to identify different issues, including accessibility problems. Siteimprove provides several types of reports useful for website maintenance:

- Accessibility: problems with web pages and PDF documents in relation to the WCAG international standards.
- Quality Assurance: broken links, misspelled words, and readability issues, including an inventory of pages, documents, media files, email addresses, and other content.
- Search Engine Optimization: technical content, user experience, and mobile-related website issues affecting non-paid search ranking.
- Policy: style-guide violations or other issues (e.g., terminology, branding/trademarks, file sizes, page structure) based on industry best practices or local customized policies.

We used this tool to evaluate 23 major university public websites:

UC Santa Cruz Website Accessibility (As of 11/6/2019)															
Site	Score	Site	Score												
Main Page		Other Divisions/Offices													
https://www.ucsc.edu/	76.4	https://bas.ucsc.edu/	66.9												
		https://its.ucsc.edu/	66.9												
		https://urelations.ucsc.edu/	68.4												
		https://officeofresearch.ucsc.edu/	67.9												
Campus Leadership		https://planning.ucsc.edu/	67.7												
https://chancellor.ucsc.edu/	66	https://studentsuccess.ucsc.edu/	68.3												
https://cpevc.ucsc.edu/	67.8	https://ue.ucsc.edu/	67.7												
		https://academicaffairs.ucsc.edu/	67.5												
Academic Divisions		https://graddiv.ucsc.edu/	66.5												
https://arts.ucsc.edu/	67.4	https://diversity.ucsc.edu/	67.5												
https://pbsci.ucsc.edu/	65.2	https://communications.ucsc.edu/	80.4												
https://www.soe.ucsc.edu/	62.1	https://titleix.ucsc.edu/	66.6												
https://humanities.ucsc.edu/	68.2	https://senate.ucsc.edu/	67.9												
https://socialsciences.ucsc.edu/	67.8														
https://library.ucsc.edu/	59.2														
https://www.ucsc-extension.edu/	82.3														
<i>*Industry Benchmark at time of review was 75</i>		<table border="1"> <thead> <tr> <th colspan="2">Summary</th> </tr> <tr> <th>Accessibility Ratings</th> <th># of sites</th> </tr> </thead> <tbody> <tr> <td>More than 10 points below benchmark</td> <td>2</td> </tr> <tr> <td>0-10 points below benchmark</td> <td>18</td> </tr> <tr> <td>Above benchmark</td> <td>3</td> </tr> <tr> <td></td> <td>23</td> </tr> </tbody> </table>		Summary		Accessibility Ratings	# of sites	More than 10 points below benchmark	2	0-10 points below benchmark	18	Above benchmark	3		23
Summary															
Accessibility Ratings	# of sites														
More than 10 points below benchmark	2														
0-10 points below benchmark	18														
Above benchmark	3														
	23														

Of the 23 sites reviewed above, 20 fell below the industry benchmark (75 at the time of review) for education. The majority of sites fell in the 66-68 range, or about 7-9 points below the benchmark. Many of the sites in this close range use the University’s Web Content Management System. Therefore improvements pushed using this system simultaneously move a large number of sites portion closer to the industry benchmark. See Appendix D for select examples of how Siteimprove presents this data.

Additionally, we conducted manual website accessibility checks on these sites for things such as proper use of “Alternative Text” on pictures. Alternative text is a word or phrase that is attached to pictures on websites within the HTML code. These words or phrases can then be read out to individuals with vision impairments to describe the content of the picture. While Siteimprove can check for the existence of alternative text, it is not able to determine if the text accurately describes the image. We found a number of cases in which the text did not match the content of the image, and this was repeatedly a problem on the UCSC.edu main page. In many cases, it appears that images were replaced on webpages without changing the alternative text. This could lead to potentially embarrassing mismatches. In one case, we observed an image file of a person that inadvertently had alternative text related to a marine animal. Website managers should be especially careful with alternative text on webpages that frequently change images to display such as on the main UCSC page.

The management of webpages is decentralized on UC Santa Cruz; there is no one central authority managing all the various sites. With poor accessibility seen across many websites at UC Santa Cruz, it is apparent that this is a

campus-wide problem. Ultimately, ensuring some form of oversight over the various campus websites is perhaps the best way to ensure UC Santa Cruz maintains an accessible web presence. The ADA compliance officer, in their central campus role, might be best situated to play a role in determining a method to ensure oversight over UC Santa Cruz's web presence. Additionally, due to the IT-centric nature of the problem, the ADA Compliance Officer will likely need to collaborate closely with ITS in determining an appropriate course of action.

C. Information Technology Accessibility Program		
IMT-1300 requires campuses to create and operate an Information Technology Accessibility Program. UC Santa Cruz has previously worked to draft a plan to meet the requirements of IMT-1300. However, no plan has ultimately been implemented from these efforts.		
Risk Statement/Effect		
UC Santa Cruz is out of compliance with UC policy IMT-1300.		
Agreement		
C.1	ITS will renew efforts to implement the Information Technology Accessibility Program. At a minimum, ITS should create an implementation plan.	Implementation Date
		07/01/2020
		Responsible Manager
		Vice Chancellor, ITS

C. Information Technology Accessibility Program

UC policy IMT-1300 requires campuses to create and operate an Information Technology Accessibility Program. . UC Santa Cruz has previously worked to draft a plan to meet the requirements of IMT-1300. However, no plan has ultimately been implemented. Without implementing the plan, UC Santa Cruz is not in compliance with IMT-1300.

According to IMT-1300, “The purpose of the IT Accessibility Program is to establish processes to address IT accessibility in a systematic fashion at each UC Location, using local structures and practices as appropriate. The Chancellor must designate an individual, and/or a committee to develop and oversee the Program and to promote coordination with system wide IT accessibility initiatives. Any designated individual and/or committee must represent a broad range of functional areas and be able to address academic, research, and administrative concerns and needs.”

IMT-1300 dictates that, at a minimum, the Information Technology Accessibility Program developed locally must include:

- **Authority and Responsibility:** assignment of roles, authority, responsibilities, and accountability for achieving policy compliance.
- **Audience:** a strategy to address the different needs of the academic, research, and administrative functions and to support IT accessibility for decentralized academic and research activities.

- **Prioritization:** a process to prioritize effort that takes into consideration local needs, practices and available resources, including providing access to centralized IT accessibility support.
- **Design Process:** a strategy to incorporate accessibility into the design and authoring process of electronic information resources.
- **Procurement:** a procedure to incorporate IT accessibility into the procurement process, including establishment of a formal means for evaluating the accessibility of products or systems under consideration for procurement.
- **Training:** a training plan for personnel who develop and maintain electronic information resources, author web content, or make IT related purchases.
- **Awareness Campaign:** a communication plan and campaign to raise awareness about IT accessibility.
- **Compliance Monitoring:** processes for monitoring compliance, including compliance with any standards listed in this Requirements document.
- **Evaluation:** an evaluation process to measure the effectiveness of the program.
- **Exception Process:** a process for determining exceptions and for ensuring the development, documentation, and communication of effective alternate forms of access.

UC Santa Cruz has drafted a program to be in compliance with IMT-1300's requirement to create an Information Technology Accessibility Program. The Accessible Technology Committee was furthermore originally charged with the responsibility of overseeing the program. In reviewing the draft of the plan, it appears to closely mirror the minimum requirements laid out above. However, this plan has never left the draft state. In our opinion, if this plan was formally adopted, it would meet the requirements laid out in IMT-1300.

The specific reasons for the plan never being formally implemented would be hard to trace to any single issue, however, one contributing factor may have been some pushback from the Academic Senate on the specific language of the draft plan. For example, in a letter in response to the Accessible Technology Transition Plan the Academic Senate indicated that the plan was too vague and that the plan inappropriately placed too much responsibility for the transition on faculty members. The letter went on to say that they would prefer the plan:

- Lay out what kind of support will be offered to ensure a smooth transition.
- Define what mechanisms will be created to communicate this policy broadly and ensure buy-in.
- Determine how the materials produced by faculty members be audited to ensure accessibility.
- Describe how other stakeholders such as the Disability Resource Center be involved.
- Define the shared responsibility between the faculty members who produce materials and the staff members who help improve these materials for greater accessibility.

Regardless of the reasons for the plan not being implemented, the requirement to implement the Information Technology Accessibility Program has never gone away. Consequently, without implementing the plan, UC Santa Cruz is not in compliance with IMT-1300. Therefore, ITS should renew efforts to formally implement the

Information Technology Accessibility Program. At a minimum, and for tracking purposes, ITS should create an implementation plan.

APPENDIX A – SUMMARY OF WORK PERFORMED AND RESULTS

Preliminary Analysis	
Work Performed	Results
We reviewed existing formal and informal policies at UC Office of the President, UC Santa Cruz, other UC campuses, and local division policy.	<ul style="list-style-type: none"> • Accessibility and accommodations both fall under the purview of the Americans with Disabilities Act (ADA), which is the primary criteria used in this audit. In fact, “ADA Compliance Officer” is the very title of the primary individual with a role of ensuring ensure nondiscrimination on the basis of disability. • The California Fair Employment and Housing Act (Cal FEHA), also serves as criteria. Cal FEHA builds on and is more stringent than the ADA. • In addition to these two laws, UC has various policies on accommodations and accessibility.
We interviewed the ADA compliance officer, disability access coordinators, and various other key players.	<ul style="list-style-type: none"> • Discussions with these individuals helped guide the development of the audit program.
We reviewed correspondence between the Academic Senate and DRC.	<ul style="list-style-type: none"> • A review of these documents helped guide the development of the audit program.

Fieldwork	
Work Performed	Results
We reviewed web resources provided to students, staff, faculty, and the public.	<ul style="list-style-type: none"> • Web resources for students, staff, and the public generally contain useful information. These sites also do a good job at indicating where individuals could gather more information.
We conducted analysis using Siteimprove to determine accessibility for 23 major public facing UCSC websites. We also conducted manual accessibility checks on these sites.	<ul style="list-style-type: none"> • Of the 23 sites reviewed, 20 fell below the industry benchmark (75 at the time of review) for education. The majority of sites fell in the 66-68 range, or about 7-9 points below the benchmark.
We attended committee meetings for Accessible Technology and the ADA advisory committee.	<ul style="list-style-type: none"> • These committees serve as an important control to ensure compliance with the ADA and other relevant laws and policies.
We reviewed financial transactions and funding for accommodations.	<ul style="list-style-type: none"> • We found no indicators of fraud, waste, or abuse during our audit.
We conducted a survey for students with an affiliation with the Disability Resource Center to understand potential areas of risk.	<ul style="list-style-type: none"> • Overall, the results of the survey were quite positive. The survey found that: <ul style="list-style-type: none"> • the majority of students reported a relatively clear process to request and receive accommodations. • the majority of students reported relatively little difficulty in receiving the classroom accommodations they requested.

	<ul style="list-style-type: none"> • the accommodations requested generally fit the needs of the students. • students generally had a good, but not excellent, view of how knowledgeable instructors were at managing accommodations. • respondents had an overwhelmingly positive view of the DRC.
<p>We reviewed UC demographic climate data.</p>	<ul style="list-style-type: none"> • The 2018 UCUES survey had a number of notable findings which UCSC’s IRAPS office curated and reported to the UCSC ADA compliance community. Among these notable findings were: • The survey found that only 31% of students with a physical disability and only 37-38% of students with a learning or cognitive disability agreed that students like them are respected at UCSC (while 26% of students with physical disabilities and 21-22% with learning or cognitive disabilities DISAGREED that they felt respected on campus). • UCSC has a much higher (39% vs 29%) rate of students with mental/emotional disabilities that impact their experience as a student than those from other UCs. This trend is true across various racial/gender demographics • UCSC has reported higher rates of hearing negative stereotypical views about their disability and students report feeling less inclusiveness regarding their disability than other UCs.

APPENDIX B – STUDENT SURVEY RESULTS

<u>Overall Responses</u>					
	1	2	3	4	5
How clear is the process to request and receive accommodations?	2%	9%	21%	33%	35%
Have you ever experienced difficulty in receiving classroom accommodations?	7%	9%	14%	28%	41%
Do you always request the classroom accommodations for which you are eligible?	14%	10%	15%	20%	40%
How well do the classroom accommodations you receive meet your needs?	1%	3%	25%	36%	34%
Do you believe instructors are adequately knowledgeable on managing accommodations?	4%	9%	30%	34%	23%
How would you rate your overall experience with the Disability Resource Center?	1%	5%	7%	34%	53%

<u>Scales</u>	1	5
How clear is the process to request and receive accommodations?	Very Unclear	Very Clear
Have you ever experienced difficulty in receiving classroom accommodations?	Commonly	Rarely
Do you always request the classroom accommodations for which you are eligible?	Rarely or Never	Almost Always
How well do the classroom accommodations you receive meet your needs?	Poorly	Perfectly
Do you believe instructors are adequately knowledgeable on managing accommodations?	Not at all	Perfectly
How would you rate your overall experience with the Disability Resource Center?	Very Negative	Very Positive

<u>How clear is the process to request and receive accommodations?</u>					
	1	2	3	4	5
1st Year Undergraduate	4%	15%	23%	31%	27%
2nd Year Undergraduate	3%	6%	18%	44%	29%
3rd Year Undergraduate	4%	9%	22%	25%	40%
Senior Undergraduate	0%	7%	21%	32%	40%
Graduate Student	6%	11%	22%	39%	22%
Scale: 1 is Very Unclear, 5 is Very Clear					

<u>How clear is the process to request and receive accommodations?</u>					
	1	2	3	4	5
Arts	8%	8%	15%	23%	46%
Engineering	9%	6%	20%	31%	34%
Humanities	0%	8%	24%	35%	32%
Physical & Biological Sciences	0%	17%	25%	32%	26%
Social Sciences	1%	6%	20%	32%	41%
Undeclared	0%	13%	50%	25%	13%
Scale: 1 is Very Unclear, 5 is Very Clear					

Have you ever experienced difficulty in receiving classroom accommodations?					
	1	2	3	4	5
1st Year Undergraduate	4%	8%	23%	38%	27%
2nd Year Undergraduate	3%	9%	12%	38%	38%
3rd Year Undergraduate	5%	7%	16%	27%	44%
Senior Undergraduate	9%	9%	9%	22%	51%
Graduate Student	22%	17%	22%	17%	22%
Scale: 1 is Commonly, 5 is Rarely					

Have you ever experienced difficulty in receiving classroom accommodations?					
	1	2	3	4	5
Arts	15%	0%	12%	27%	46%
Engineering	9%	9%	11%	34%	37%
Humanities	5%	11%	19%	30%	35%
Physical & Biological Sciences	8%	8%	23%	25%	38%
Social Sciences	6%	12%	7%	28%	48%
Undeclared	0%	0%	50%	0%	50%
Scale: 1 is Commonly, 5 is Rarely					

Do you always request the classroom accommodations for which you are eligible?					
	1	2	3	4	5
1st Year Undergraduate	8%	0%	15%	31%	46%
2nd Year Undergraduate	18%	18%	12%	18%	35%
3rd Year Undergraduate	11%	9%	18%	27%	35%
Senior Undergraduate	10%	10%	13%	16%	50%
Graduate Student	39%	17%	22%	0%	22%
Scale: 1 is Rarely or Never, 5 is Almost Always					

Do you always request the classroom accommodations for which you are eligible?					
	1	2	3	4	5
Arts	15%	15%	23%	15%	31%
Engineering	14%	11%	29%	20%	26%
Humanities	27%	14%	5%	16%	38%
Physical & Biological Sciences	9%	9%	11%	21%	49%
Social Sciences	12%	10%	13%	20%	45%
Undeclared	38%	0%	0%	13%	50%
Scale: 1 is Rarely or Never, 5 is Almost Always					

How well do the classroom accommodations you receive meet your needs?					
	1	2	3	4	5
1st Year Undergraduate	8%	4%	19%	46%	23%
2nd Year Undergraduate	0%	3%	26%	29%	41%
3rd Year Undergraduate	0%	0%	16%	42%	42%
Senior Undergraduate	0%	4%	28%	34%	34%
Graduate Student	6%	11%	44%	22%	17%
Scale: 1 is Poorly, 5 is Perfectly					

How well do the classroom accommodations you receive meet your needs?					
	1	2	3	4	5
Arts	0%	0%	27%	42%	31%
Engineering	3%	9%	26%	40%	23%
Humanities	0%	3%	32%	32%	32%
Physical & Biological Sciences	2%	4%	30%	30%	34%
Social Sciences	0%	4%	19%	36%	41%
Undeclared	13%	0%	25%	38%	25%
Scale: 1 is Poorly, 5 is Perfectly					

Do you believe instructors are adequately knowledgeable on managing accommodations?					
	1	2	3	4	5
1st Year Undergraduate	0%	4%	35%	50%	12%
2nd Year Undergraduate	0%	6%	38%	32%	24%
3rd Year Undergraduate	4%	2%	29%	38%	27%
Senior Undergraduate	4%	12%	26%	29%	28%
Graduate Student	17%	33%	22%	22%	6%
Scale: 1 is Not at all, 5 is Perfectly					

Do you believe instructors are adequately knowledgeable on managing accommodations?					
	1	2	3	4	5
Arts	8%	12%	23%	31%	27%
Engineering	3%	11%	23%	49%	14%
Humanities	8%	14%	24%	27%	27%
Physical & Biological Sciences	4%	6%	38%	34%	19%
Social Sciences	3%	9%	32%	29%	28%
Undeclared	0%	0%	25%	38%	38%
Scale: 1 is Not at all, 5 is Perfectly					

How would you rate your overall experience with the Disability Resource Center?					
	1	2	3	4	5
1st Year Undergraduate					
2nd Year Undergraduate					
3rd Year Undergraduate					
Senior Undergraduate					
Graduate Student					
Scale: 1 is Very Negative, 5 is Very Positive					
<hr/>					
How would you rate your overall experience with the Disability Resource Center?					
	1	2	3	4	5
Arts	0%	4%	0%	46%	50%
Engineering	6%	3%	6%	40%	46%
Humanities	0%	3%	8%	32%	57%
Physical & Biological Sciences	2%	8%	13%	25%	53%
Social Sciences	1%	4%	7%	33%	54%
Undeclared	0%	0%	0%	75%	25%
Scale: 1 is Very Negative, 5 is Very Positive					

APPENDIX C – UC DEMOGRAPHIC CLIMATE SURVEY RESULTS

Source: UCSC IRAPS Office

EXPERIENCES OF STUDENTS WITH DISABILITIES AT UCSC & OTHER UC CAMPUSES

I. STUDENTS WITH DISABILITIES AT UCSC & OTHER CAMPUSES

On the 2018 UC Undergraduate Experience Survey (UCUES), students responded to the following question: **Do you have any conditions or disabilities that significantly affect your experience as a student at UC [Campus Name], including how you learn or perform academically, interact with others, or access the campus?** They were asked to respond yes or no about each of the following (including the examples in parentheses):

mental health/emotional concern or condition (e.g., depression, anxiety, post-traumatic stress disorder), neurodevelopmental/**cognitive** disability or condition (e.g., autism, attention-deficit/hyperactivity disorder, brain injury), **learning** disability or condition (e.g., dyslexia, speech disorder), or **physical** disability or condition (e.g., mobility limitation, sensory condition).

Overall, about 1 in 3 students across all the UCs reported having a **mental health/emotional** concern or condition. Relatively fewer (4-5%) students reported having a **cognitive, learning, or physical** disability.

UCSC students reported **significantly higher** rates of each type of disabilities or conditions compared to students at the other UCs (see Figure 1). Of note, about 2 in 5 (39%) of UCSC students reported having a **mental health/emotional** concern or condition, compared to 29% of students at the other UCs. Compared to their UC counterparts, **significantly more** UCSC students reported having one disability, as well as multiple disabilities (see Table 1).

Figure 1. Types of disability at UCSC and other UCs

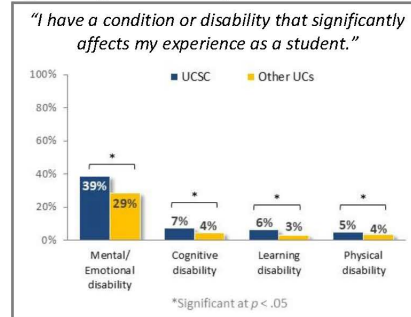


Table 1. Types and number of disabilities at UCSC and other UCs

Respondents	UCSC	Other UC
Type of disability		
Mental health/Emotional concern or condition (e.g., depression, anxiety, post-traumatic stress disorder)	39%	29%
Neurodevelopmental/ cognitive disability or condition (e.g., autism, attention-deficit/hyperactivity disorder, brain injury)	7%	4%
Learning disability or condition (e.g., dyslexia, speech disorder)	6%	3%
Physical disability or condition (e.g., mobility limitation, sensory condition)	5%	4%
Number of disabilities		
ONLY 1 disability or condition	33%	26%
Multiple disabilities/conditions	11%	7%
AT LEAST 1 disability or condition	44%	34%

¹ Overall, 39% of UCSC undergraduates responded to the 2018 UCUES. Women were overrepresented among respondents at UCSC and other UCs. For our analyses, we calculated and applied proportional weights to ensure that our overall results matched the relative proportion of women and men enrolled.



Source: UCSC IRAPS Office

Of the UCSC students who reported having at least one type of disability, about **1 in 4 (27%) reported that they receive accommodations from campus**. There was a small but statistically significant difference between students who receive accommodations at UCSC versus at the other UCs (27% of UCSC students vs. 20% of students at the other UCs, $p < .05$).

Links between Mental Health and Gender & Race/Ethnicity

Gender

Across all the UC campuses, **significantly more women** than men reported having a **mental health/emotional** concern or condition (e.g., depression, anxiety, post-traumatic stress disorder).

At UCSC, half (49%) of women reported having a **mental health/emotional** concern or condition, compared to 29% of men. At the other UCs, about 1 in 3 (35%) women reported having a **mental health/emotional** concern or condition, compared to 1 in 5 (21%) men.

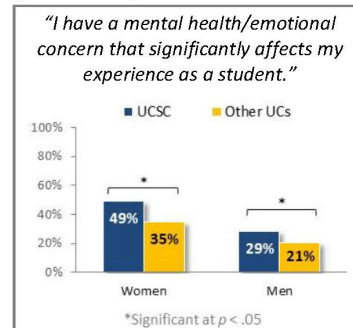
This gender difference is further supported by the survey data from the 2019 National College Health Assessment (NCHA), which found that 1 in 6 (17%) women across all the UCs had been diagnosed with **depression**, compared to 9% of men. Please note that the NCHA questions are phrased differently than on UCUES and NCHA sample is relatively small compared to UCUES.²

Compared to women at the other UCs, **significantly more women at UCSC** reported having a **mental health/emotional** concern or condition. This was also true of men at UCSC versus men at the other UCs (see Figure 2).

Specifically, 49% of women at UCSC reported having a **mental health/emotional** concern or condition, compared to 35% of women at the other UCs, and 29% of men at UCSC reported having a **mental health/emotional** concern or condition, compared to 21% of men at the other UCs.

Similarly, the NCHA found that 25% of women and 15% of men at UCSC had been diagnosed with **depression**, compared to 17% of women and 9% of men across all the UCs. Furthermore, results from the NCHA suggest that rates of **depression among women at UCSC have increased since 2016**, while rates of depression among men have stayed relatively stable. In the 2016 survey, 16% of women and 15% of men at UCSC reported being diagnosed with **depression**.

Figure 2. Mental health of women and men at UCSC and the other UCs (2018 UCUES)



² This nationwide survey was administered in February of 2019 by the American College Health Association to a random sample of 6,000 UCSC undergraduates. The response rate was 11% ($n = 650$ respondents).



Source: UCSC IRAPS Office

Race/Ethnicity³

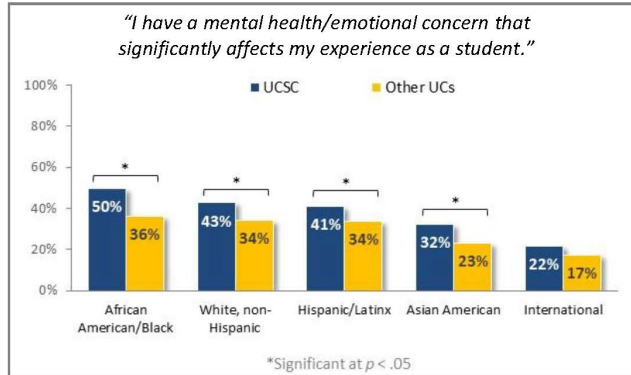
Across all the UC campuses, **significantly more African American/Black, Hispanic/Latinx, and White, non-Hispanic** students reported having a **mental health/emotional** concern or condition, compared to their Asian American and international peers.

At UCSC, nearly half (41-50%) of African American/Black, Hispanic/Latinx, and White, non-Hispanic students reported having a **mental health/emotional** concern or condition, compared to 32% of Asian American students and 22% of international students. At the other UCs, 1 in 3 (34-36%) of African American/Black, Hispanic/Latinx, and White, non-Hispanic students reported having a **mental health/emotional** concern or condition, compared to 23% of Asian American students and 17% of international students.

Within all four racial/ethnic groups of domestic students, **significantly more UCSC students** reported having a **mental health/emotional** concern or condition compared to their counterparts at the other UCs (see Figure 3).

For example, 50% of African-American/Black students at UCSC reported having a **mental health/emotional** concern or condition, compared to 36% of African-American/Black students at the other UCs.

Figure 3. Mental health of different racial/ethnic groups at UCSC and other UCs



Only international students reported similar rates of mental health/emotional concerns at UCSC and the other UCs.

Intersections of Gender & Race/Ethnicity

We compared students’ rates of mental health/emotional concern within each intersection of gender and race/ethnicity in order to identify subgroups at UCSC who are reporting particularly high rates of mental health/emotional concern compared to their counterparts at the other UCs.

Within each intersection of gender and race/ethnicity, **students at UCSC reported significantly higher rates** of **mental health/emotional** concern than students at the other UCs (see Figure 4, next page).

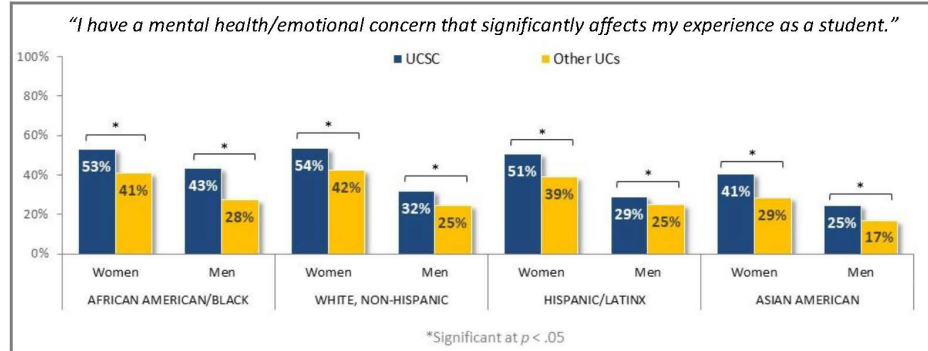
³ We compared four largest racial/ethnic groups (African American/Black, Asian American, Hispanic/Latinx, and White, non-Hispanic), as well as international students. Asian American students included students who identified as Chinese, Korean, Japanese, East Indian, or Pakistani; and Hispanic/Latinx students included students who identified as Latinx or Chicanx.



Source: UCSC IRAPS Office

For example, 53% of African American/Black women at UCSC reported having a **mental health/emotional** concern or condition, compared to 41% of African American/Black women at the other UCs.

Figure 4. Mental health of women and men of different racial/ethnic groups at UCSC and other UCs



For the frequencies of each type of disability among UCSC students and students at the other UCs, by gender and race/ethnicity, see Table 2 below.

Table 2. Types of disabilities at UCSC, by race and gender*

	African American/Black (n = 208)		Asian American (n = 1527)		Hispanic/Latinx (n = 1514)		White, non-Hispanic (n = 1853)		International (n = 187)	
Mental health/Emotional concern or condition										
UCSC	53%	43%	41%	25%	51%	29%	54%	32%	28%	19%
Other UCs	41%	28%	29%	17%	39%	25%	42%	25%	21%	13%
Cognitive disability or condition										
UCSC	9%	17%	4%	6%	6%	7%	10%	9%	2%	11%
Other UCs	5%	8%	2%	4%	3%	5%	7%	8%	2%	3%
Learning disability or condition										
UCSC	10%	12%	3%	4%	7%	6%	8%	8%	3%	7%
Other UCs	4%	7%	2%	2%	3%	4%	4%	5%	3%	4%
Physical disability or condition										
UCSC	8%	12%	4%	5%	4%	3%	6%	5%	10%	9%
Other UCs	5%	6%	2%	3%	3%	4%	5%	5%	3%	4%
n (UCSC)	138	70	713	812	849	662	910	934	55	131
n (Other UCs)	962	539	9893	8121	7685	4977	6461	5395	2159	2468

*Blue text indicates women, orange text indicates men



Source: UCSC IRAPS Office

II. EXPERIENCES OF STUDENTS WITH DISABILITIES

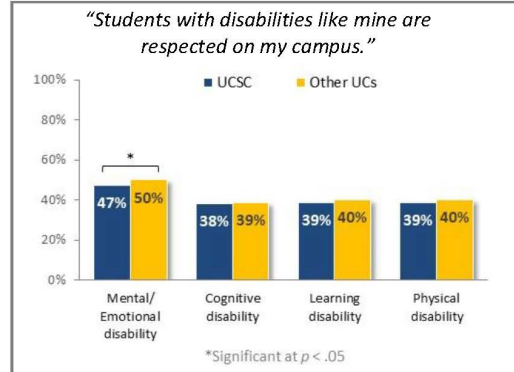
Are students with disabilities respected on this campus?

We compared the proportions of students who agreed or strongly agreed with the statement “Students with disabilities like mine are respected at my campus.”

Overall, about 40% of students with **cognitive**, **learning**, or **physical** disabilities agreed with this statement about their campus (UCSC or other UCs).

Almost 1 in 2 students with a **mental health/emotional** concern or condition agreed that students with a disability like theirs are respected. However, there was a small but statistically significant difference between UCSC and other UCs (47% of UCSC students vs. 50% of students at the other UCs, see Figure 5).

Figure 5. Perceived respect at UCSC and other UCs (Percentage of students who *agreed or strongly agreed*)



How often have you heard negative or stereotypical views about disabilities at UCSC?

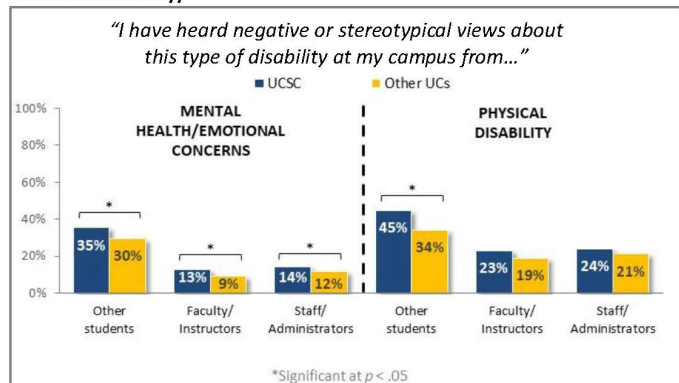
We compared the proportions of students who reported hearing “negative or stereotypical views about their disabilities at their campus” at least occasionally.

Compared to the other UCs, **significantly more UCSC students** with a **mental health/emotional** concern or condition heard other UCSC students express negative or stereotypical views about psychological disabilities at least occasionally (35% of UCSC students vs. 30% of other UC students, see Figure 6).

In addition, **significantly more UCSC students** with a **mental health/emotional** concern or condition heard teaching faculty/instructors and non-teaching staff/administrators express negative or stereotypical views about psychological disabilities at least occasionally. However, these differences were small.

Compared to the other UCs, **significantly more UCSC students** with a **physical** disability heard other UCSC students express negative or stereotypical views about physical

Figure 6. Students’ experiences of negative views about disabilities at UCSC and other UCs (Percentage of students with **mental health/emotional** and **physical** disabilities who heard these views at least occasionally)



Source: UCSC IRAPS Office

disabilities at least occasionally (45% of UCSC students vs. 34% of other UC students, $p < .05$).

UCSC and other UC students with **cognitive** and **learning** disabilities reported similar rates of exposure to negative or stereotypical views about disabilities from other students, teaching faculty/instructors, and non-teaching staff/administrators.

Campus Climate for Diversity and Inclusion

We selected students who reported having at least one disability, and compared the proportions of students who agreed or strongly agreed with the following statements about the campus climate for diversity and inclusion:

- *Top campus administrators / Faculty ... are genuinely committed to promoting respect for and understanding of group differences at UCSC.*
- *Overall, I feel comfortable with the climate for diversity and inclusiveness ... at this campus / in my major / in my classes.*

Overall, about 1 in 2 students with a disability agreed that faculty are **genuinely committed to promoting respect** for and understanding of group differences (at both UCSC and other UCs).

In contrast, only 1 in 3 (36%) students agreed that top campus administrators are **genuinely committed to promoting respect** for and understanding of group differences. Moreover, **significantly fewer UCSC students** than students at the other UCs agreed with this statement (29% of UCSC students vs. 37% of students at the other UCs, $p < .05$, see Figure 7).

Figure 7. Perceived campus commitment to diversity (Percentage of students who agreed or strongly agreed)

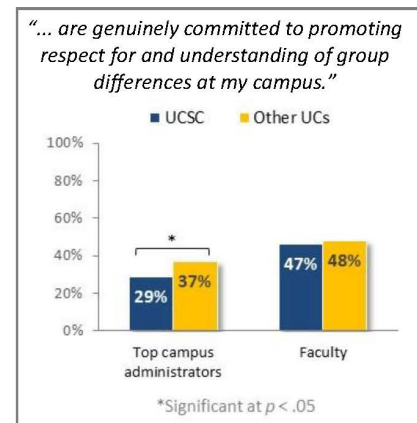
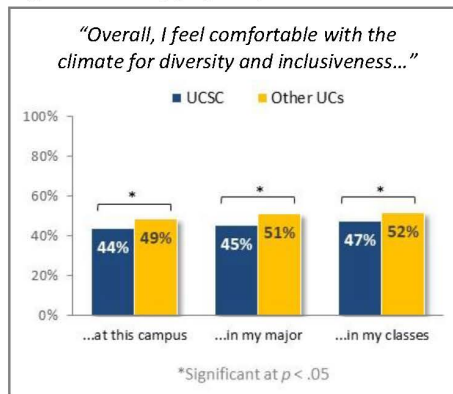


Figure 8. Perceived climate for diversity and inclusiveness (Percentage of students who agreed or strongly agreed)



Overall, only about half of students with a disability felt **comfortable with the climate for diversity and inclusiveness** at their campus, in their major, and in classes.

In addition, **significantly fewer UCSC students** felt **comfortable with the climate for diversity and inclusiveness** in all three of these contexts compared to students at the other UCs (see Figure 8), but these differences were generally small.



APPENDIX D – SITEIMPROVE EXAMPLES

Select Siteimprove examples

Siteimprove

11/6/2019 8:18 AM

Site
SC - Library

Accessibility

Accessibility Overview

Score details

- Progress in resolving Errors 83.5 /100
- Progress in resolving Warnings 74.1 /100
- Percentage of pages with low Error rate 3.4 /100

Overall score

Accessibility

59.2

/100

+ 0.0

Accessibility Score progress

Accessibility appeared to drop significantly in late 2018:

Industry Benchmark

This Site

Annotations

Levels of Conformance and Severity

● Level A ● Level AA ● Level AAA ⚠ Errors ⚠ Warnings ⚠ Reviews

Issues (all roles)

Editor

Webmaster

Developer

Page error rate

Fix These Issues To Improve Your Score

Issue	Points you can gain
⚠ Link identified only by color	0.78 points
⚠ Invalid WAI-ARIA role, state or property	0.77 points
⚠ "Aria-labelledby" has incorrect (ID) reference	0.77 points
⚠ "Aria-labelledby" has incorrect (ID) reference	0.77 points
⚠ "Aria-labelledby" has incorrect (ID) reference	0.77 points

Fixed Issues


Issue	Points already gained
✅ WAI-ARIA image is missing alternative text	0.83 points
✅ Image map without reference	0.83 points
✅ Frame is missing a description	0.83 points
✅ WAI-ARIA group is missing a name	0.83 points
✅ WAI-ARIA validation error is present when page loads	0.83 points

Last completed crawl: 11/6/2019

Next crawl scheduled for: 11/6/2019

41

Select Siteimprove examples


11/6/2019 8:18 AM

Site SC - Main Campus

Accessibility

Accessibility Overview

Score details

Progress in resolving Errors **97.6** /100

Progress in resolving Warnings **89.4** /100

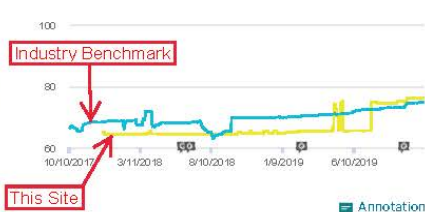
Percentage of pages with Low Error rate **27.8** /100

Overall score

76.4 /100
+0.0

Accessibility Score progress

Accessibility appeared to increase significantly around July 2019:



Levels of Conformance and Severity

● Level A ● Level AA ● Level AAA ⓘ Errors ⚠ Warnings 🗉 Reviews

Issues (all roles)

👤 Editor

👤 Webmaster

👤 Developer

📊 Page error rate

Fix These Issues To Improve Your Score


Issue	Points you can gain
ⓘ Element not highlighted on focus	0.31 points
ⓘ Color contrast is insufficient	0.27 points
ⓘ Link text used for multiple different destinations	0.22 points
⚠ Content not included in landmarks	0.15 points
ⓘ Color contrast is insufficient	0.12 points

Fixed Issues

Issue	Points already gained
✅ Image with no alt attribute	0.83 points
✅ "Aria-labelledby" has incorrect (ID) reference	0.83 points
✅ WAI-ARIA image is missing alternative text	0.83 points
✅ Image map without reference	0.83 points
✅ "Area" element is missing alternative text	0.83 points

Last completed crawl: 11/4/2019
Next crawl scheduled for: 11/9/2019

Select Siteimprove examples


11/6/2019 8:20 AM

Site
SC - Office For Diversity, Edulty, And Inclusion

Accessibility

Accessibility Overview

Score details

Progress in resolving Errors **97.3** /100

Progress in resolving Warnings **78.6** /100

Percentage of pages with low Error rate **0.0** /100

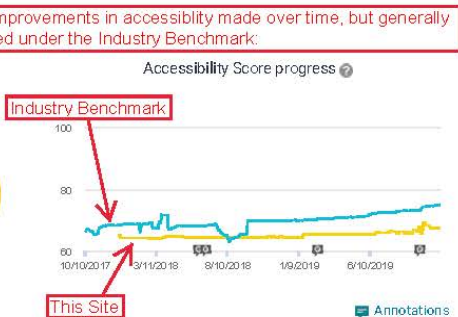
Overall score

67.5

/100

- 1.0

Accessibility Score progress



Levels of Conformance and Severity

● Level A ● Level AA ● Level AAA ⚠ Errors ⚠ Warnings ⚠ Reviews

Issues (all roles)

🔧 Editor

🔧 Webmaster

🔧 Developer

📊 Page error rate

Fix These Issues To Improve Your Score

Issue	Points you can gain
⚠ Element not highlighted on focus	0.53 points
⚠ Link text used for multiple different destinations	0.45 points
⚠ Color contrast is insufficient	0.33 points
⚠ "I" tag used to format text	0.25 points
⚠ Content not included in landmarks	0.25 points

Fixed Issues

Issue	Points already gained
✅ Image with no alt attribute	0.83 points
✅ "Aria-labelledby" has incorrect (ID) reference	0.83 points
✅ WAI-ARIA image is missing alternative text	0.83 points
✅ Page element has no description	0.83 points
✅ Image map without reference	0.83 points

Last completed crawl: 11/4/2019
Next crawl scheduled for: 11/9/2019