



# AUDIT AND ADVISORY SERVICES

## Accessibility Governance Audit Project No. 17-694

March 6, 2018

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March 6, 2018

Khira Griscavage  
Associate Chancellor  
Chief Ethics, Risk & Compliance Officer & Locally Designated Official

Associate Chancellor Griscavage:

We have completed our audit of accessibility governance as per our annual service plan in accordance with the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing* and the University of California Internal Audit Charter.

Our observations with management action plans are expounded upon in the accompanying report. Please destroy all copies of draft reports and related documents. Thank you to the staff from the Associated Students of the University of California, central Human Resources, the Disabled Students' Program, Equity and Inclusion, the Office of the Dean of Students, the Office of Disability Compliance, the Office of Emergency Management, the Office of Legal Affairs, the Office of the Registrar, Facilities Services, the Office of the Vice Provost for the Faculty, Residential and Student Service Programs, University Health Services, and the Web Accessibility team for their cooperative efforts throughout the audit process. Please do not hesitate to call on Audit and Advisory Services if we can be of further assistance in this or other matters.

Respectfully reported,

Wanda Lynn Riley  
Chief Audit and Risk Executive

cc: Vice Chancellor Oscar Dubón  
Vice Chancellor Marc Fisher  
Vice Chancellor and Chief Financial Officer Rosemarie Rae  
Senior Vice President and Chief Compliance and Audit Officer Alexander Bustamante  
Assistant Vice Chancellor and Controller Delphine Regalia

**University of California, Berkeley  
Audit and Advisory Services  
Accessibility Governance**

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# OVERVIEW

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## Executive Summary

The audit objective was to

- evaluate campus policies, procedures and practices implemented to ensure that people with disabilities are protected from discrimination by managing services, programs and activities in a way that allow equal participation to include communication access, facility access, student accommodation, and employment accommodation; and
- evaluate the design and governance of the compliance program for supporting compliance with federal and state laws governing protections for people with disabilities including the *Americans with Disabilities Act*.

Based upon our audit work performed, we observe that the current organization of campus roles, responsibilities, and business processes likely provides operational challenges to ensure that these objectives are consistently met. Our audit scope did not include, and so we do not express, an opinion as to whether the campus is currently at least minimally compliant with relevant laws and regulations related to accessibility.

Our conclusion is comprised of two principal components:

Given the complexity of accessibility responsibilities and requirements and the multitude of units delivering accessibility services, there is a void in senior leadership authoritative oversight.

Our decentralized model for providing academic student life or employee support services may be incrementally burdensome for the individual requiring access and accommodation support. There are opportunities for management to holistically catalog and evaluate the disaggregated service delivery approach for accessibility needs to reduce confusion as to where to seek help, minimize duplications or overlap in services provided, reduce the number of total interactions required, and identify and address potential service delivery gaps.



## **Purpose of the Audit**

The audit objective was to

- evaluate campus policies, procedures and practices implemented to ensure that people with disabilities are protected from discrimination by managing services, programs and activities in a way that allow equal participation to include communication access, facility access, student accommodation, and employment accommodation; and
- evaluate the design and governance of the compliance program for supporting compliance with federal and state laws governing protections for people with disabilities including the *Americans with Disabilities Act*.

## **Scope of the Audit**

Our audit focused on the current design and organization of campus roles, responsibilities, and business processes with respect to accessibility and reasonable accommodation. We included consideration of the following elements related to disability compliance:

- oversight responsibilities,
- assigned authorities, responsibilities, and reporting lines,
- policies and communication of policies,
- risk management measures,
- program monitoring,
- reporting and resolution of complaints, and
- integration of information systems.

Our audit procedures included interviews with campus subject-matter experts as well as a sample of members from the impacted faculty, staff and student communities. We also reviewed available relevant documentation from campus and other external sources such as peer institutions and professional organizations. Our audit fieldwork was conducted between July 2016 and March 2017.

We note in particular that our procedures were designed to evaluate current governance and organization, but were not designed to reach an opinion on whether the campus was minimally compliant with any particular law, regulation, or university policy. As such, we do not express such an opinion.

## **Background Information**

The campus was an early pioneer in accommodating students with disabilities in the 1960s and 1970s, including the creation of the Physically Disabled Student Program which is now known as the Disabled Students' Program. Today, many campus units provide specific accessibility services to students, faculty, staff, and the general public. For example, the types of accessibility services include, but are not necessarily limited to

- academic accommodations
- accessible web platforms
- architectural (physical) access
- assistive technologies
- campus access services
- capital renewal program

- complaint and conflict resolution
- counseling
- emergency communications
- emergency management
- ergonomic program
- housing accommodation
- informational services
- interactive process facilitation
- legal services
- parking and transportation
- student support services
- telecommunications
- training
- web accessibility consulting

In addition, here is a non-exhaustive list of campus units that provide the accessibility services listed above.

- Academic Personnel Office
- Cal Housing
- Central Human Resources
- Classroom Management
- Counseling and Psychological Services
- Campus Shared Services – Human Resources and Academic Personnel Support
- Disability Management
- Disabled Students’ Program
- Educational Technology Services
- Employee Assistance
- Ergonomics Program
- Facilities Services
- Information Services and Technology – Voice Operations, Products and Services
- Office for Faculty Equity and Welfare
- Office of Disability Compliance
- Office of Emergency Management
- Office of Legal Affairs
- Ombuds Office for Students and Postdoctoral Appointees
- Parking and Transportation
- Staff Ombuds Office
- Web Platform Services
- UC Police Department
- University Library

The campus is subject to multiple compliance obligations including, but not limited to, the *American with Disabilities Act*, the *California Rehabilitation Act of 1973*, the *California Fair Employment and Housing Act*, the *California Education Code*, and a settlement agreement in the matter of *Gustafson et al. v. UC Regents*.

In August 2016, the campus received notice from the US Department of Justice that significant portions of its free audio and video content available to the public on the campus YouTube channel and its iTunesU platform as well as its Massive Open Online Courses (MOOCs) offered on the edX learning management platform were not accessible to individuals with hearing, vision or manual disabilities. After consideration of the findings, in March 2017, the campus subsequently changed access to restrict certain older videos and podcasts to members of the campus community, with a stated goal of improving accessibility features of new public content.

See the appendix for a listing and description of the accessibility services offered by the campus as of our audit fieldwork.

## Summary Conclusion

Based upon our audit work performed, we observe that the current organization of campus roles, responsibilities, and business processes likely provides operational challenges to ensure that objectives are consistently met.<sup>1</sup>

Our conclusion is comprised of two principal components:

Given the complexity of accessibility responsibilities and requirements and the multitude of units delivering accessibility services, there is a void in senior leadership authoritative oversight.

Our decentralized model for providing academic student life or employee support services may be incrementally burdensome for the individual requiring access and accommodation support. There are opportunities for management to holistically catalog and evaluate the disaggregated service delivery approach for accessibility needs to reduce confusion as to where to seek help, minimize duplications or overlap in services provided, reduce the number of total interactions required, and identify and address potential service delivery gaps.

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<sup>1</sup> As noted in our scope section, our audit scope did not include, and so we do not express, an opinion as to whether the campus is currently at least minimally compliant with relevant laws and regulations related to accessibility.

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## SUMMARY OF OBSERVATIONS & MANAGEMENT RESPONSE AND ACTION PLAN

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### Assigning Executive Level Responsibility

#### Observation

Given the complexity of accessibility responsibilities and requirements that are currently addressed in a disaggregated manner by dozens of campus units, we observe that the campus would be well served by assigning an individual at a senior management (Vice Chancellor) level overall authority and responsibility for accessibility compliance and to exercise oversight, perhaps through dotted-line reporting, for the provision of accessibility services. When considering the individual portfolios of the Vice Chancellors, we observe that the Vice Chancellor for Equity and Inclusion may be the most aligned position for this authority given shared objectives.

Although this role would not have day-to-day operational oversight over the campus units providing accessibility services, we envision that the Vice Chancellor would be responsible, with appropriate staff support, for

- identifying relevant regulatory and legal compliance requirements with respect to accessibility;
- guiding the development and implementation of campus goals, objectives, strategies, and policies and procedures with respect to accessibility;
- facilitating discussion between departments or divisions to reduce duplication of effort as well as inconsistencies or gaps in service delivery;
- ensuring that complaints related to reasonable accommodation are reviewed and addressed in a timely manner;
- coordinating periodic review of campus compliance efforts related to accessibility; and
- establishing key reporting metrics, requiring periodic reporting from service providers to the Vice Chancellor, and consolidating such information for a campus-wide view of the state of accessibility services to be presented to the Chancellor, fellow Vice Chancellors, the Office of the President, and other interested stakeholders. This reporting could be to an existing executive-level campus committee such as the Chancellor's Cabinet or the Committee on Compliance, Accountability, Risk and Ethics (CARE). Given that campus committees periodically wax and wane in activity and importance, the Vice Chancellor would need to ensure that appropriate reporting lines stay current and relevant.

We would like to emphasize that our recommendation does not imply that the Vice Chancellor would be the responsible and accountable party for individual compliance risks related to accessibility. Each campus unit with delegated responsibility would still be responsible for specific compliance obligations and the resultant risk of noncompliance. However, the Vice Chancellor would function in a higher-level position to provide oversight, guidance, and overall accountability to keep the Chancellor and peers apprised of efforts in their respective divisions. To that effect, the Vice Chancellor may wish to partner with the Chief Ethics, Risk and Compliance Officer for the campus, who has overall responsibility for the campus ethics and compliance program.

Additionally, the Vice Chancellor would likely also need to partner with the Executive Vice Chancellor and Provost as well as the Vice Chancellor and Chief Financial Officer to coordinate financial resources for those areas deemed as having critical funding needs that cannot be addressed within their division.

## Management Response and Action Plan

We concur with the observation that there is a need to identify a Vice Chancellor or senior level position that is charged with overall authority and responsibility for accessibility compliance and to exercise oversight, for the provision of accessibility services. We have been in discussions and believe the Vice Chancellor of Administration may assume this responsibility and work collaboratively with the Office of the Chancellor and Vice Chancellor of Equity and Inclusion to address climate and culture needs in managing disability accessibility.

The Office of the Chancellor is organized into six reporting departments that provide administrative, organizational, strategic, and compliance services to advance the Chancellor's vision, core values, and priorities. The Chief Ethics, Risk and Compliance Officer (CERCO) reports to the Chancellor and is responsible for the implementation of an appropriate compliance infrastructure with performance metrics, programs, and guidelines designed to detect and prevent non-compliant and unethical conduct throughout the campus. Additionally, the CERCO works with the Office of Equity and Inclusion which provides leadership and accountability to resolve systemic inequities, which includes creating a culture and climate that is welcoming and supports persons living with disabilities.

The Chancellor's vision with the recent appointment of the Vice Chancellor of Equity and Inclusion is that the Division would reflect the campus' continuing commitment to creating an environment in which all members of the campus community are welcomed, respected and valued. Through conversations and engagement with faculty, staff, students, and alumni, the Chancellor and Executive Vice Chancellor and Provost expect that part of an overall diversity and inclusion plan would include developing goals and strategies for disability and access issues to move the university toward its goal of inclusive excellence. Preliminary work has already begun with the creation of an inventory of "best practices" developed by the Division of Equity and Inclusion, that identifies specific actions to shift culture and campus-wide disability awareness and inclusion.

Additionally, the Vice Chancellor of Equity and Inclusion was charged in the spring of 2017 with leading the Disability Strategy Team (DST) to assess the disability access concerns. This effort resulted in a set of recommendations for consideration. The DST report focused on short-term tactics that would improve service delivery, physical access, and disability accommodations. The recommendations from DST included the development of a long-term disability and accessibility strategic plan and the hiring of an ADA Coordinator to bring additional subject matter expertise on the access and accommodations process. The Chancellor's office concurs with these recommendations.

The new ADA Coordinator, Vice Chancellor of Equity and Inclusion, Vice Chancellor of Administration, and CERCO, in partnership with a newly created Chancellor's Advisory Committee on Disability, will play a pivotal role in framing a strategy that not only effectively changes the paradigm for those living with disabilities, but also promotes a model that is sustainable in changing campus culture. Combined with a strong communication strategy, we should be able to develop a substantive plan to strengthen and improve the campus culture around disability services and access concerns. The Vice Chancellor for Administration and Office of the Chancellor will develop a job description, organizational structure, and resource approach to supporting the creation of an ADA Coordinator. We hope to fill this position by July 1, 2018.

## Opportunities for Operational Improvements

### Observation

The assessment and provisioning of reasonable accommodation for students, faculty, staff, and other members of the campus community for various campus services is handled by the individual departments providing the service with limited collaboration and coordination. We observed opportunities for collaboration and coordination across campus units to reduce duplicative efforts, inconsistencies in the provision of services, and potential service gaps.

The campus organizational culture, not dissimilar from other large, complex universities with tripartite missions of teaching, research and public service, is decentralized among academic and administrative divisions and departments. Students, faculty, staff, and the general public must often navigate through many departments to obtain the service or information that they need. For those with disabilities and resultant needs for accommodation, they have to potentially navigate through another layer of administration to have their needs addressed.

Through our interviews with both a sample of campus service providers and members of the impacted community, we heard accounts where students, faculty, or staff have to interact with multiple units in order to secure accommodation. In certain circumstances, individuals believed that the accommodation offered by the campus unit was not adequate. In some circumstances, complaints were filed with the campus with some results deemed satisfactory and others unsatisfactory. Due to the number of interviews we conducted, we did not seek to validate all of the individual accounts we were told or to reach an independent conclusion as to the handling of each case. However, individual experiences appeared to corroborate a general theme that more could be done to effectively accommodate needs.

Our general observation is that our decentralized model for providing academic or employee support services may be incrementally burdensome for those with access needs. Most students requiring accommodations initially engage with the Disabled Students' Program before being referred to other campus units for specific needs – such as with campus housing, parking and transportation, the campus libraries, or individual academic departments. Similarly, most faculty and staff engage with the Disability Management unit with respect to workplace accommodation as well as potentially other units such as central Human Resources, Campus Shared Services – Human Resources and Academic Personnel Support, Employee Assistance, Ergonomics, the Academic Personnel Office, their home department, etc.

Given the current campus culture and organization, we recognize that developing a “one-stop shop” approach is likely unrealistic in the short run for students, faculty, or staff to have all their needs met in one place. However, we believe that there are opportunities for management to holistically catalog and evaluate the disaggregated service delivery method approach for the disabled to reduce confusion as to where to seek help, eliminate duplications or overlap in services provided, reduce the number of total interactions required, and identify and address potential service delivery gaps.

Specific examples of opportunities for operational improvement include, but are not necessarily limited to, the following.

- Some employees indicated that available information on how to make an accommodation request and the process the campus uses to determine a reasonable accommodation is confusing and access to and the availability of auxiliary aids and services<sup>2</sup> is inconsistent.
- The Disabled Students' Program, Cal Housing, Disability Management, and Campus Shared Services use different technology platforms to receive requests, evaluate, and track accommodations for students and employees.
- The Disabled Students' Program, Educational Technology Services, and the University Library have separate facilities and platforms to make instructional materials accessible.
- Web-based content and applications used across the campus are not consistently accessible (e.g., UC Learning Center, bCourses, CalTime, and CalCentral).
- Depending on where a complaint related to accommodation is first received, they would be handled separately by the Disabled Students' Program, Office of Disability Compliance, Office for the Prevention of Harassment and Discrimination, Campus Shared Services – Human Resources and Academic Personnel Support, or central Human Resources. There is not currently a mechanism to share or coordinate complaint handling or to ensure consistent handling of complaints across units.
- The Disabled Students' Program has experienced significant recent turnover in leadership and advisors. Some individuals interviewed felt that this situation has led to a diminution in the ability to provide timely and responsive service and to coordinate and secure reasonable accommodation with faculty instructors.
- Accommodations available to different populations of staff, faculty, and students vary (e.g., interpreters are not available to employees).
- Generally funding for accommodation is a departmental responsibility resulting in disparate accommodations.
- Additionally, annual variations and fluctuations in funding from the campus Capital Projects and Capital Renewal Committees may make it challenging to meet our ongoing compliance obligations related to physical access under the Gustafson Settlement Agreement.
- Responsibility for handling of faculty accessibility and reasonable accommodations was identified as an operational gap.

## **Management Response and Action Plan**

The Chancellor and Executive Vice Chancellor and Provost (EVCP) charged the Division of Equity & Inclusion in Spring 2017 to lead a cross-functional Disability Strategy Team (DST). The scope of the committee charge was to conduct a comprehensive study of all recommendations for campus-wide disability/accessibility needs. The recommendations were based upon multiple considerations and review of proposals, including this audit engagement. DST submitted a set of recommendations to the Chancellor and EVCP that was reviewed and vetted by the Chancellor's Cabinet for input in November/December 2017. The report proposed an incremental change for disability and access services and identified: personnel, centralized disability access funding, structural/procedural issues, professional development, and strategic planning as the five prioritized focus areas.

Management agrees with the audit report observation that the nature of the decentralized campus model for providing academic student life and employee support services may be incrementally burdensome for the individual requiring access and accommodation support. Moreover, the proposal to minimize confusion and to reduce redundancy and operating inefficiency through a coordinated management

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<sup>2</sup> For example, interpreters, note-takers, computer-aided transcription services, and methods for making visually delivered materials available to individuals with visual impairments.

approach would enhance operations. Management supports this assessment and is committed to the value of developing a global plan for disability service delivery that is equitable, consistent, and helpful to faculty, students, and staff.

Senior management is actively pursuing and committed to implementing a model to address infrastructure gaps, supporting a rational resource allocation plan, investing in best practices and tools, improving education and training on the “interactive process and physical access,” and setting standards and expectations through service level agreements. Of note, there are campus service components that are in place that addresses the organizational outreach aims. The Disability Compliance Officer (DCO) provides expertise in bridging the educational gap through advocacy work around the academic accommodations process and informal complaint resolution of disputes for undergrads and professional students. The DCO is currently collaborating with the Dean of the Graduate Division on revising the GSI training modules, presenting to Graduate Student Affairs Officers, and preparing information for dissemination to various GSI hubs. Additionally, the DCO has provided to academic leadership a New Faculty Training Seminar with vital information on the “interactive process” for faculty and continues to work on a platform to share the content more broadly with departments across the campus to increase the disability accommodations risk intelligence for the campus.

Senior administration remains in on-going consultation with various Vice Chancellor offices in determining the appropriate structure for functional disability management and compliance. Moreover, it accepts the recommendation to improve the service delivery of disability access and to better support the accommodations process. We believe the addition of an ADA Coordinator will permit a more streamlined and coordinated approach and will simplify the navigation of disability support services. The Vice Chancellor of Administration and Office of the Chancellor will develop a job description, organizational structure, and resource approach to supporting the creation of an ADA Coordinator. We hope to fill this position by July 1, 2018.



## Appendix – List of Accessibility Services

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
Academic Accommodations	Process for disabled student to self-identify and to seek and obtain a Letter of Accommodation (LOA) establishing a set of academic accommodations based on each student's individual disability.	Disabled Students' Program	Karen Nielson, Director Carolyn Swalina, DSP Lead Specialist			X	
TRIO – Academic Support	TRIO academic support services include <ul style="list-style-type: none"> <li>• Assistance in transitioning into UC Berkeley</li> <li>• Academic advising</li> <li>• Individual academic consultations on study skills, initial academic planning, and test-taking</li> <li>• Exploring Learning Differences: Strategies for Success, a two-unit course for students with learning differences that promotes academic success</li> <li>• Instruction in assistive technology</li> </ul>	Disabled Students' Program	Karen Nielson, Director Juan Berumen, Coordinator			X	
TRIO – Financial Aid and Money Management	TRIO financial aid and money management services include financial aid counseling, money management tools and resources, and grant-in aid awards for eligible Pell Grant recipients.	Disabled Students' Program	Karen Nielson, Director Juan Berumen, Coordinator			X	
TRIO – Post-Graduate Planning	TRIO post-graduation planning services include <ul style="list-style-type: none"> <li>• Graduate school information and planning</li> <li>• Professional development and different ability course</li> <li>• Career exploration and assessment</li> </ul>	Disabled Students' Program	Karen Nielson, Director Juan Berumen, Coordinator			X	
Campus Access Services	Campus Access Services is a type of accommodation providing information and/or assistance to the UC Berkeley campus community and individuals with disabilities who require access to participate in university-sponsored non-course-related programs or activities.	Disabled Students' Program	Ben Perez, Access Coordinator	X	X	X	X

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
	<p>For instance</p> <ul style="list-style-type: none"> <li>• Sign language interpreting</li> <li>• Real-time captioning</li> <li>• Assistance with locating accessible transportation</li> <li>• Assistance with changing venues to an accessible location</li> <li>• Event walkthrough</li> <li>• Location of disabled parking</li> <li>• Path of travel</li> <li>• Location of accessible building entrances, restrooms, and seating</li> <li>• Mechanism for reporting access barriers</li> </ul>						
Mobility Consultations	Assist students with planning accessible paths between classes and to/from residence and to look into the availability of accessible furniture.	Disabled Students' Program	Ben Perez, Access Coordinator			X	
Accessible Classroom Furniture	A type of accommodation whereby students can request accessible classroom furniture, for example, detachable tables and chairs, adjustable height tables, or standing lecterns.	Disabled Students' Program	Ben Perez, Access Coordinator			X	
Priority Class Enrollment	Priority class enrollment is an accommodation provided to eligible Disabled Students' Program (DSP) enrolled students.	Disabled Students' Program	Karen Nielson, Director Carolyn Swalina, DSP Lead Specialist			X	
Reduced Course Load Letters (RCL's), Financial Aid Petitions and Other Letter Requests	RCLs, financial aid petitions, and other letter requests is a type of accommodation signed by DSP and addressed to the Financial Aid Office and/or college academic advisor.	Disabled Students' Program	Karen Nielson, Director Carolyn Swalina, DSP Lead Specialist			X	
Proctoring Services	The proctoring service is type of accommodation to provide support (proctors and space) in the event that the department or faculty do	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>	X			

<sup>3</sup> This is in an interim capacity until a vacant position is filled due to retirements and transitions.

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
	not have the requisite resources to provide these accommodations.						
Alternative Media Center	The Alternative Media Center is a type of accommodation provided to DSP enrolled students who have been approved by their DSP specialists for alternative media academic accommodations (e.g., print materials to electronic materials, large print or Braille).	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	
Student Technology Grants	The Student Technology Grant is a type of accommodation for DSP enrolled students who are eligible for student financial aid to help support their needs with assistive technology.	Disabled Students' Program	Karen Nielson, Director			X	
Note-taking	DSP's note-taking service is a type of accommodation that provides in-class note-taking and assistive technology for note-taking.	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	
American Sign Language (ASL) Interpreting	An accommodation service for students who are deaf or hard-of-hearing. DSP provides the service through third-party contracted interpreters.	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	
Communication Access Realtime Translation (CART) Service	An accommodation service for students who are deaf or hard-of-hearing. CART produces word-to-text translation of lectures, discussions and seminars. DSP has three staff CART providers. A CART provider is assigned to a class based on the student's schedule after the specialist has approved requests for services.	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	
Assistive Listening Devices (ALDs)	An accommodation service whereby DSP will loan ALD receivers to hard-of-hearing students on request.	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	
Hand-Held Tape Recorders	An accommodation service whereby DSP will loan a hand-held tape recorder for use in class to any deaf or hard-of-hearing student who requests one.	Disabled Students' Program	Karen Nielson, Director <sup>3</sup>			X	



Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
Grievance/ Complaint Resolution	Informal resolution processes to afford students an opportunity to resolve complaints about eligibility decisions, academic accommodations, auxiliary services, communication services, denial of services or other administrative decisions of the Disabled Students' Program.	Disabled Students' Program	Karen Nielson, Director			X	
DSP Website	Publishes information on all current services offered, relationships with other campus service providers and service offerings, contacts, mechanisms for requesting services, and policies, procedures, and/or guidelines. <a href="http://dsp.berkeley.edu/">http://dsp.berkeley.edu/</a>	Disabled Students' Program	Karen Nielson, Director	X	X	X	X
Career Services	Provides career services to DSP students, including career planning, internships, graduate school planning, and a broad range of services targeted at retention and career success for students with disabilities.	Disabled Students' Program	DSP Career Counselor at UC Berkeley Career Services			X	
Graduate Student Disability Specialist	Provides targeted disability services to graduate students. Interfaces with colleges and the graduate division to enhance services for DSP students.	Disabled Students' Program	Graduate Student Disability Specialist			X	
Disability Resolution	Informal complaints or grievances resolution for students due to physical accessibility barriers.	Office of Disability Compliance	Derek Coates, Disability Compliance Officer	X – Worksite Accessibility	X – Worksite Accessibility	X	X – Worksite Accessibility
Architectural Access	<ul style="list-style-type: none"> <li>Oversees campus-wide implementation of a comprehensive long-term program to upgrade facilities and outdoor paths of travel on the core campus.</li> <li>Directs, organizes, and administers the campus response to existing physical facilities that may not conform to the 2010 Americans with Disabilities Act (ADA) Standards for Accessible Design and/or Title 24 of the California Code of Regulations (Title 24).</li> </ul>	Office of Disability Compliance	Jeremy White, Senior Program Manager and California Access Specialist	X	X	X	X

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
	<ul style="list-style-type: none"> <li>Ensures that the campus meets its obligations arising under court orders and settlements with respect to disability access to physical facilities and paths of travel.</li> <li>Provides counsel, advice and assistance critical to campus units fulfilling their legal responsibility to make their programs accessible to persons with disabilities, for example, related to emergency preparedness, transportation, and parking.</li> </ul>						
Disability Compliance Website	<p>Publishes information on their disability resolution service; relationships with other campus service providers and service offerings; contacts; mechanisms for filing a complaint; and policies, procedures, and/or guidelines. <a href="https://disabilitycompliance.berkeley.edu/">https://disabilitycompliance.berkeley.edu/</a></p>	Office of Disability Compliance	Derek Coates, Disability Compliance Officer and Jeremy White, Senior Program Manager and California Access Specialist	X	X	X	X
Web Accessibility Consulting	<p>Build and provide accessible web platform solutions; provide online resources; offer online tools and resources; offer clinics for functional owners of campus systems, applications, and websites; and provide consulting on requests for proposals (RFPs). <a href="https://webaccess.berkeley.edu">https://webaccess.berkeley.edu</a></p>	Web Platform Services	Kathleen Lu, Manager	X	X	X	X
Open Berkeley	<p>A complete web publishing turnkey solution that includes hosting; site spin up; training; site launch; security, accessibility, and maintenance updates; new features; and ongoing support. Accessibility is embedded in the Open Berkeley platform. The platform is regularly tested for accessibility and any new features are vetted for accessibility before they are deployed. <a href="https://open.berkeley.edu">https://open.berkeley.edu</a></p>	Web Platform Services	Kathleen Lu, Manager	X	X	X	X



Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
Web Hosting for Drupal and WordPress	A Drupal-specific or WordPress-specific hosting platform that provides powerful, easy-to-use tools for building and maintaining Drupal or WordPress websites. An external vendor, Pantheon, provides the service. <a href="https://web.berkeley.edu/web-hosting-pantheon">https://web.berkeley.edu/web-hosting-pantheon</a>	Web Platform Services	Kathleen Lu, Manager	X	X	X	X
Web Platform Services	Publishes information on all current services offered; relationships with other campus service providers and service offerings; contacts; mechanisms for requesting services; accessibility tools; and policies, procedures, and/or guidelines. <a href="https://web.berkeley.edu">https://web.berkeley.edu</a>	Web Platform Services	Kathleen Lu, Manager	X	X	X	X
Consultation and Accommodation Services	<ul style="list-style-type: none"> <li>Confidential consultation to faculty and staff whose disability may impact their ability to work.</li> <li>Guidance on topics such as leaves of absence, reasonable accommodation and the interactive process.</li> <li>Confidential communication between the university and health care providers in order to obtain or clarify functional limitations and work restrictions.</li> <li>Technical assistance in exploring options for reasonable accommodation.</li> <li>Guidance to managers, supervisors and HR partners on workplace disability matters.</li> <li>Coordination of the Workers' Compensation program for the university; includes working closely with employees and supervisors to find solutions for reasonable accommodation.</li> </ul>	Disability Management	Mike Imazumi, Manager	X	X		
Legal, Policy, and Labor Relations Consultation Services	Provide mandated disability consultation and services related to federal and state disability laws, university policies, and collective bargaining agreements.	Disability Management	Mike Imazumi, Manager	X	X		

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
				Faculty	Staff	Students	General Public
Disability Management: Workshops, Classes and Training	Keys to Enhance Your Supervisory Success (KEYS) - Risk Management Track (Disability Management: Understanding the Process) and, upon request, individualized departmental training tailored around any number of disability management topics.	Disability Management	Mike Imazumi, Manager	X	X		
Disability Management Website	Publishes information on all current services offered, relationships with other campus service providers and service offerings, contacts, and mechanisms for requesting services and guidance.  <a href="https://uhs.berkeley.edu/bewellatwork/disability-management">https://uhs.berkeley.edu/bewellatwork/disability-management</a>	Disability Management	Mike Imazumi, Manager	X	X		
Ergonomics	<ul style="list-style-type: none"> <li>• Computer and non-computer ergonomic consultations.</li> <li>• Coordination of the campus network of departmental computer workstation evaluators.</li> <li>• Administers the Computer Ergonomics Matching Funds Program, which offers up to \$500 per employee in matching funds to modify on-site computer workstations according to campus ergonomic guidelines.</li> <li>• Offers ergonomics workshops and classes.</li> </ul>	Ergonomics Program	Mike Imazumi, Manager	X	X		
Counseling	All UC Berkeley students get up to five free counseling sessions every year to help with personal, academic, career and health-related issues, as well as urgent help for crisis concerns. Several staff have strong backgrounds working with students with disabilities beyond - or in addition to - psychiatric needs. Counseling and Psychological Services (CPS) has a satellite counseling location at the Disabled Students' Program in 487 Evans Hall.	Counseling and Psychological Services (CPS)	Jeffrey Prince, Director			X	



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				Faculty	Staff	Students	General Public
Social Services	<p>Social Services can help disabled students with</p> <ul style="list-style-type: none"> <li>Emotional support and problem solving for students with physical disabilities and/or chronic illnesses.</li> <li>Exploring ways to address financial stress caused by an unexpected medical emergency.</li> <li>Academic adjustments, including medical withdrawal, when needed.</li> </ul>	Counseling and Psychological Services (CPS)	Jeffrey Prince, Director			X	
Employee Assistance	The campus faculty and staff Employee Assistance program providing free, confidential counseling and referral for UC Berkeley faculty and staff, including the Lawrence Berkeley National Laboratory. Employee Assistance offers support in a wide range of issues, including depression, anxiety, and other emotional problems and alcohol, drug and other addictions.	Employee Assistance	Rob Starkey, Director	X	X		
Legal Services	Legal advice, dispute resolution, and liaison between the campus and the UC Office of General Counsel.	Office of Legal Affairs	Christopher Patti, Chief Campus Counsel	X	X		
Policies, Procedures, and/or Guidelines	<p>The Office of the President develops policies.</p> <p>Campus central Human Resources (CHR) develops the procedures, guidance, and applications for implementing policies (e.g., Personnel Policies for Staff Members) as they relate to staff applicants and employees with disabilities in the areas of recruitment, appointment, performance management, compensation, classification, professional development, termination, complaint resolution, reasonable accommodation and the interactive process in general. CHR</p>	Central Human Resources	Anita Raman, Director, Policy and Labor Relations	X	X		



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				Faculty	Staff	Students	General Public
	works with Academic Personnel on all matters pertaining to faculty.						
Early Resolution	The goal of Early Resolution is to resolve concerns at the earliest stage possible with the cooperation of all parties involved. Individuals and supervisors are encouraged to utilize Early Resolution options when the parties desire to resolve the situation cooperatively and/or when a formal investigation is not likely to lead to a satisfactory outcome. Early Resolution may include an inquiry into the facts, discussions with the parties, making recommendations for resolution, and facilitating an agreement between the parties.	Central Human Resources	Anita Raman, Director, Policy and Labor Relations		X		
Formal Investigation	In cases where Early Resolution is unsuccessful or inappropriate, CHR conducts an investigation by interviewing the parties involved, including witnesses, and reviewing and evaluating other available evidence. The CHR investigator then determines whether the evidence supports a finding that university policy has been violated and issues a written report of their findings to the university administrator responsible for determining appropriate action.	Central Human Resources	Anita Raman, Director, Policy and Labor Relations		X		
Equal Employment Opportunity (EEO) Notices	Posts notices in an accessible format to applicants, employees, and members describing the applicable provisions of Equal Employment Opportunity laws.	Central Human Resources	Anita Raman, Director, Policy and Labor Relations	X	X		
Benefits and Leave Counseling and Advice	Campus Shared Services — Human Resources and Academic Personnel Support is responsible for providing support related to coordinating interactive process to reach a reasonable accommodation, claims resolution, and service facilitation for all UC Berkeley employees.	CSS —HR and Academic Personnel Support	Sharon Johnson, Supervisor, Health Care Facilitator/ Benefits	X	X		

Service Offerings	Service Description	Service Provider	Service Owner	Stakeholders Served By This Service			
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Faculty EEO Notices	Posts notices in an accessible format for staff applicants and employees describing the applicable provisions of the Equal Opportunity for Individuals with Disabilities.	Office for Faculty Equity & Welfare	Angelica Stacy, Associate Vice Provost for Faculty Equity	X			
Policies, Procedures, and/or Guidelines	Develops the procedures, guidance, and applications for implementing policies as they relate to faculty with disabilities in the areas of recruitment, appointment, performance management, compensation, classification, professional development, termination, complaint resolution, reasonable accommodation and the interactive process in general. Academic Personnel works with CHR on all matters pertaining to faculty.	Academic Personnel Office	Heather Archer, Assistant Vice Provost	X			
Faculty Accommodation Fund	The office of the Vice Provost for Faculty administers a fund to assist departments when costs for an approved reasonable accommodation exceed one thousand dollars in a given year if the chair and dean budgets cannot provide the funding.	Academic Personnel Office	Heather Archer, Assistant Vice Provost	X			
Capital Renewal Program	An annual reinvestment program to restore and renew all UC Berkeley facilities including buildings, utilities and landscape. An annual program of projects is created and confirmed by the Capital Renewal Committee (CRC) each year and then referred to the Capital Projects Committee for final approval. Funding for classroom renewal and Gustafson Settlement Agreement projects are a part of this program.	Real Estate	Sally McGarrahan, Director, Asset Management/ Facilities Services	X	X	X	X



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				Faculty	Staff	Students	General Public
Housing Accommodations	<p>Process for disabled students to receive a reasonable accommodation is to self-identify, fill out the housing accommodations request form, and have medical provider submit a letter explaining how each accommodation addresses the functional limitations of the student's disability. Examples of housing accommodations includes</p> <ul style="list-style-type: none"> <li>• Automatic door opener</li> <li>• ADA compliant bathroom (including roll in shower)</li> <li>• Visual doorbell (typically for students with hearing impairments)</li> <li>• Strobe light fire alarm/smoke detector (typically for students with hearing impairments)</li> <li>• Ability to rent more than one MicroChill unit</li> <li>• Room with additional space for medical equipment</li> <li>• Semi-private bathroom</li> <li>• Ground floor room or room on a lower floor</li> <li>• Location close to Tang Medical Center for access to health care</li> <li>• Room removed from traffic noise, distractions from outdoors, and other loud ambient sound</li> <li>• Room with less allergens</li> <li>• Placement with a requested roommate</li> <li>• Private room or room with fewer roommates</li> <li>• Substance free environment</li> <li>• Assistance or emotional support animal</li> </ul>	Cal Housing	Dana Bache, Interim Associate Director			X	
Class Scheduling	A type of accommodation whereby a course is moved from a classroom deemed inaccessible to another	Classroom Management	Pam Armstrong,	X		X	

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				Faculty	Staff	Students	General Public
	room that better meets a student's access needs.		Classroom Manager				
Assistive Listening Systems	Assistive listening systems (ALS) in approximately 70 general assignment classrooms and a portable ALS that can be checked out for classrooms that don't have ALS built in.	Educational Technology Services (ETS)	Owen McGrath Associate Director Teaching and Learning Spaces and Operations	X	X	X	X
Drop-In Facilities and Software	Three drop-in computer facilities that feature one to two stations each that are loaded with a range of assistive technology (i.e., bookedge scanners) and software located in the Moffitt Library, Wheeler Hall, and the Valley Life Sciences Building.	Educational Technology Services (ETS)	Owen McGrath Associate Director Teaching and Learning Spaces and Operations	X	X	X	
Alternative Media Conversion	Alternative media conversion is offered through Sensus Access. Sensus Access is a self-service solution that automates the conversion of documents into a range of alternative formats including mp3, e-books, Braille, and Daisy <sup>4</sup> . The service can also be used to convert otherwise inaccessible documents such as image-only pdf files, scanned images, lecture notes or other educational material into more accessible formats.	Educational Technology Services (ETS)	Owen McGrath Associate Director Teaching and Learning Spaces and Operations	X	X	X	
General Research Assistance	Assists with <ul style="list-style-type: none"> <li>Using the library catalogs, OskiCat and Melvyl, to research a topic</li> <li>Accessing databases and e-journals</li> <li>Determining library holdings and locations</li> <li>Reading call numbers</li> <li>Oral or written directions to help locate library materials</li> </ul>	University Library	Elizabeth Dupuis, Associate University Librarian	X	X	X	X

<sup>4</sup> [www.daisy.org/daisypedia/daisy-digital-talking-book](http://www.daisy.org/daisypedia/daisy-digital-talking-book)



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	<ul style="list-style-type: none"> <li>Pulling books from stacks and shelves (may be on delayed basis)</li> </ul>						
Accessible Workstations	All libraries, with the exception of the Anthropology Library, the Math Library, Interlibrary Services, and the Education Psychology Library, have at least one wheelchair accessible workstation	University Library	Elizabeth Dupuis, Associate University Librarian	X	X	X	X
Proxy Borrower Cards	UC Berkeley students, faculty and staff with a mobility disability may be eligible for a proxy borrower card. A proxy borrower card permits a specified friend or attendant to borrow library materials for them.	University Library	Elizabeth Dupuis, Associate University Librarian	X	X	X	
Self-service Scanners	Scanners available for all library users to convert print materials to digital files. The machines and interfaces have been designed to accommodate many needs of users with disabilities.	University Library	Elizabeth Dupuis, Associate University Librarian	X	X	X	X
Scan On Demand (Library Materials)	<p>UC Berkeley students registered with the Disabled Students' Program as authorized for services for users with print disabilities can request any library book or article be scanned in full by library staff.</p> <p>Note: DSP does this for course-related materials. This service is related to the non-required items. This is currently only available to students while they await a process for campus to determine whether faculty/staff are eligible for such a service.</p>	University Library	Elizabeth Dupuis, Associate University Librarian			X	
Emergency Management Area (EMA) and Building Coordinator Program	Responsible for coordination and administration of the EMA and Building Coordinator program. The Office of Emergency Management develops procedures, guidelines, tools, and training for Building Coordinators who are responsible for preparing Building Emergency Plans (BEP) and during a large-scale emergency, serving as a	Office of Emergency Management	Amina Assefa, Manager, Office of Emergency Management	X	X	X	X

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	communications liaison between the campus Emergency Operations Center and building occupants. Administrative officials are responsible for appointing Building Coordinators. BEPs include information about designated waiting areas for individuals with mobility impairments and optionally can include information about individuals with mobility impairments (if they self-identify as needing evacuation assistance). Each building has a marked designated waiting area. Evacuation chairs are located in buildings (with stairs) that either house student programs or have a regular occupant who has identified as having a mobility impairment. The Disability Compliance Office provides the evacuation chairs.						
Blue Parking Spaces	Campus parking spaces reserved for persons with disabilities. A description of the specific measurement and slope of campus disabled parking (DP) spaces is available online. In addition, hardcopy maps of DP parking spaces are available from Parking and Transportation Services and at the West Gate and East Gate kiosks.	Parking and Transportation	Seamus Wilmot, Director	X	X	X	X
Dedicated Parking Spaces	On rare occasions, particular parking spaces are dedicated for exclusive use of a named faculty, staff, or student with a disability.	Parking and Transportation	Seamus Wilmot, Director	X	X	X	
Campus Parking Permit as Student Accommodation	When DSP determines that parking is a necessary, reasonable accommodation for a student in order to access the UC Berkeley academic curriculum, a campus parking permit may be provided by DSP at no cost to the student provided that they are officially registered as a student at UC Berkeley and campus parking is listed in the student's DSP LOA.	Parking and Transportation	Seamus Wilmot, Director			X	



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The Loop	The Loop is a golf cart that provides intra-campus rides for eligible faculty, staff, and students with disabilities on a first-come, first-serve basis. This service was created to assist persons with mobility difficulties. The Loop only operates on the core campus.	Parking and Transportation	Seamus Wilmot, Director	X	X	X	
Bear Transit	All daytime shuttles are equipped with wheelchair lifts.	Parking and Transportation	Seamus Wilmot, Director	X	X	X	X
CalPBX	Provides telephone equipment for sale to departments, faculty, staff and students with disabilities.  Publishes information on their website regarding legal requirements, the California Telephone Access Program (CTAP), campus TTY locations, and telecommunications relay service providers through the campus operator services unit.  Provides customized solutions to staff, faculty and students as needed after personal consultation with the individual or department involved.	IST — Voice Operations, Products and Services	Jovie Soliman, Manager	X	X	X	X
Alert Systems	WarnMe and Nixle are alert and notification systems serving UC Berkeley's students, faculty and staff. The systems will warn of situations on or near campus that pose immediate threats to safety and will provide instructions for what to do in case of major emergencies. Messages are sent to all personnel with a "berkeley.edu" email address and can be sent to SMS if desired.	UCPD	Stephen Stoll, Manager, Services and Homeland Security	X	X	X	X
Telephone Emergency Services	Dialing 911 from a landline anywhere on campus, or dialing (510) 642-3333 from a cell phone, will connect to UCPD's dispatch center as an emergency call. UCPD dispatch center is equipped to respond to	UCPD	Stephen Stoll, Manager, Services and Homeland Security	X	X	X	X

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	calls via text telephones and telecommunications relay services.						
Staff , Non-Senate Academics, and Faculty Conflict Resolution Services	<p>The Staff Ombuds Office is an independent department that provides strictly confidential, impartial and informal conflict resolution and problem-solving services for all staff, non-Senate academics, and faculty who perform management functions. Services provided by the Staff Ombuds Office include</p> <ul style="list-style-type: none"> <li>• Conflict analysis</li> <li>• Strategies to resolve and prevent disputes</li> <li>• Identification of options and information</li> <li>• Communication and conflict coaching</li> <li>• Mediation</li> <li>• Group facilitation</li> <li>• Tailored trainings in conflict resolution</li> <li>• Resource referrals</li> <li>• Providing regular feedback to campus leaders regarding systemic issues</li> </ul>	Staff Ombuds Office	Sara Thacker, Director and Ombudsperson		X		
Student Conflict Resolution Services	<p>Assists with sorting through a campus-related conflict or concern. Some of the matters the Ombudsperson provides include</p> <ul style="list-style-type: none"> <li>• A confidential place to discuss complaints and consider options</li> <li>• Referrals for students and postdocs to appropriate campus services and resources</li> <li>• Assistance with problem-solving to minimize the escalation of conflict</li> <li>• Assistance for people in conflict to develop mutually acceptable outcomes</li> </ul>	Ombuds Office for Students and Postdoctoral Appointees	Marcia Gee Riley, Director			X	



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	<ul style="list-style-type: none"> <li>Coaching individuals on how to communicate their concerns non-defensively</li> </ul>						