

Action Plan to Address Higher Education Barriers faced by Students with Disabilities

I. Opportunity for Students with Disabilities—A Strategic Priority for Virginia

This Action Plan is proposed in answer to current policy priorities of the Commonwealth, including (but not necessarily limited to):

A. *Pathways to Opportunity: The Virginia Plan for Higher Education:*

i. Goal 1 (Equitable): “Close access and completion gaps. Remove barriers to access and attainment especially for Black, Hispanic, Native American and rural students; students learning English as a second language; students from economically disadvantaged backgrounds; and students with disabilities” (p. 6, emphasis added).

ii. Strategies (Access):

- *“Expand postsecondary opportunities and awareness to Virginians who may not view higher education as an option.*
- *Strengthen student support services for persistence and completion: mental health, mentoring, career services, social, student basic needs, information technology, disability support and other services” (p. 9, emphasis added).*

B. Governor Youngkin’s Executive Order 10 (2022), which specifically includes among responsibilities of Virginia’s Chief Diversity, Opportunity & Inclusion Officer “to expand entrepreneurship and economic opportunities for disadvantaged Virginians, including Virginians living with disabilities” (emphasis added).

The number of students with disabilities in K-12 and their families is growing in Virginia. With an increase in this demographic, Virginia has an opportunity to lead the nation with innovative data collection practices, policies and initiatives to enable improved higher education outcomes for students with disabilities. Improved educational outcomes will translate into expanded opportunities for people with disabilities to realize their full potential, participate productively in the workforce, and contribute to their own and the Commonwealth’s economic and societal success.

II. Higher Education and Students with Disabilities in Virginia—The Scale of the Issue and its Impact on Economic Opportunity

The scale and scope of the issue is large and growing. For the 2021-2022 school year, there are currently 169,578 students with disabilities in K-12, approximately 13% of the total K-12 enrollment. Of those students, 14,116 are in the 12th grade this year, equivalent to 40% of the total number of first year students entering Virginia higher education institutions during the same time period.

Population of Students with Disabilities in Virginia Public Schools (K-12) 2021-2022 School Year ¹

Disability Type	
Autism	24,207
Deaf-Blindness	24
Developmental Delay	13,840
Emotional Disturbance	8,590
Hearing Impairments	1,171
Intellectual Disabilities	8,321
Multiple Disabilities	2,678
Orthopedic Impairments	489
Other Health Impairments	34,537
Specific Learning Disabilities	51,718
Speech or Language Impairments	23,143
Traumatic Brain Injured	335
Visual Impairments	525

People with disabilities participate in the labor force at greatly reduced rates.²

According to the Department of Labor Office of Disability Employment Policy, persons with a disability aged 16-64 in 2021 had a 36.7% labor force participation rate, compared to 76.6% for those without a disability. Additionally, any postsecondary credential increases one's earnings by 84% over a lifetime, and a Bachelor's degree, on average, is worth \$2.8 million in additional lifetime earnings.³ However, only 41% of students with

¹ Virginia Department of Education, "Special Education Child Count."
https://www.doe.virginia.gov/special_ed/reports_plans_stats/child_count/index.shtml

² U.S. Department of Labor Office of Disability Employment Policy, "Disability Employment Statistics."
<https://www.dol.gov/agencies/odep/research-evaluation/statistics>

³ Carnevale, Anthony P., Ban Cheah, and Stephen J. Rose. "The college pay off." (2011).

disabilities in Virginia enrolled in an institution of higher education complete their degree within six years, compared to 51% for students without disabilities.⁴

As of 2022, Virginia has three specialized programs that provide employment and independent living skills to adults with disabilities, in partnership with institutions of higher education. These Comprehensive Transition and Postsecondary Programs (CTP) serve students with intellectual and developmental disabilities, but they are currently able to serve fewer than 100 students, considerably less than the population of students willing and able to participate. Two institutions have plans to create CTPs, but lack the startup funding to get them off the ground.

III. Addressing Barriers to Opportunity for Students with Disabilities and Recommendations for Consideration

For students with disabilities, success in higher education enables greater participation in the workforce and improved economic opportunity, independent living, integration in society, and better health outcomes. The barriers students with disabilities currently face to access and succeed in higher education are likely to reduce their contributions in the workforce, and thus represent costs, not only to our students with disabilities, but to the Commonwealth as a whole. This Action Plan seeks to identify the most pressing barriers and steps to take in the near and intermediate term to remove them.

Neither Virginia, nor as far as we know, any other state, has attempted to develop a state-level plan to address barriers for students with disabilities in higher education. Therefore, the steps envisioned here are in many cases first, not final, steps. It is expected that this Action Plan will be subject to review, modification, and supplementation as we move forward, gain better information, and learn what does and does not work. The recommended next steps here span three domains, which have been identified as the most crucial areas to address. They are: **Data Collection; Access to Higher Education;** and **Success in Higher Education.**

Sections A-C below set out in order a brief description of each domain, followed in each case by “goals” for recommended actions. Highest priority goals are italicized. It is anticipated that SCHEV staff will use the Disabilities Access to Higher Education

⁴ Newman, Lynn, Mary Wagner, Renee Cameto, Anne-Marie Knokey, and Debra Shaver. “Comparisons across Time of the Outcomes of Youth with Disabilities up to 4 Years after High School. A Report of Findings from the National Longitudinal Transition Study (NLTS) and the National Longitudinal Transition Study-2 (NLTS2). NCSER 2010-3008.” National Center for Special Education Research (2010).

Advisory Committee to work through concrete approaches to most, if not all, the goals. The Disabilities Access to Higher Education Advisory Committee will provide input on the goals, steps, timelines and resources needed for implementation as well as metrics to measure success. The process will be iterative over time.

A. Data Collection

Currently, data collection for students with disabilities in higher education is inconsistent. Information on student transitions from secondary to postsecondary education is lacking, and data collection seeks to gather information already collected at the institutional-level to understand the full scale of the phenomenon. Expanding information collection to include disability as a specific category would thus address an “information injustice.” Outcomes can only be improved for populations about which information is known.

The Code of Virginia, § 23.1-203, states Council’s core data collection duty as follows:

9. Develop a uniform, comprehensive data information system designed to gather all information necessary to the performance of the Council’s duties. The system shall include information on admissions, enrollment, self-identified students with documented disabilities, personnel, programs, financing, space inventory, facilities, and such other areas as the Council deems appropriate. When consistent with the Government Data Collection and Dissemination Practices Act (§ 2.2-3800 et seq.), the Virginia Unemployment Compensation Act (§ 60.2-100 et seq.), and applicable federal law, the Council, acting solely or in partnership with the Virginia Department of Education or the Virginia Employment Commission, may contract with private entities to create de-identified student records in which all personally identifiable information has been removed for the purpose of assessing the performance of institutions and specific programs relative to the workforce needs of the Commonwealth.

(emphasis added)

While SCHEV has long collected extensive unit record data from higher education institutions, including (but not limited to) student course and program enrollment, ethnographic characteristics, and geographic origins, it has not yet done so for “self-identified students with documented disabilities.” Adding standardized disabilities data to this collection will be a first step toward identifying actions that would promise

to improve educational outcomes for students with disabilities. The collection of such data would both prompt uniformity in how institutions themselves collect data on their students and constitute the beginning of longitudinal information on outcomes for students with disabilities in accessing and completing higher education programs. All affected parties (students/families, institutions, and the Commonwealth) will be empowered to understand transitions between K-12 and higher education, and to identify gaps in services and opportunities for improvement.

Goals:

1. *Establish new, standardized guidelines for student-level data collection on students with disabilities and incorporate into SCHEV's regular ongoing data collection responsibilities, in accordance with the Code of Virginia § 23.1-203(9).*

B. Access to Higher Education

Students with disabilities attend post-secondary institutions at a considerably lower rate than their non-disabled peers⁵ because the hurdles that a student must clear before enrolling in an institution of higher education are numerous. The first potential impediment for student access and enrollment is standardized testing itself. Receiving an accommodation from a testing company for a disability can be difficult, which can in turn affect a student's competitiveness for admission, or preclude them from admissions testing entirely.

Another potential barrier for students with disabilities can be the cost of evaluations. After high school, a student may be required to obtain new disability documentation, which can cost several thousand dollars, and require a significant time investment. Moreover, documentation requirements vary across, and sometimes within, institutions. There can also be wide discrepancies in the ability of families to bear the costs of documentation, not to mention their relative capacities to navigate institutional bureaucracies.

In addition to the lack of standardized admissions documentation requirements, there is also a disconnect between the K-12 and higher education systems for assisting

⁵ Newman, Lynn, Mary Wagner, Renee Cameto, Anne-Marie Knokey, and Debra Shaver. "Comparisons across Time of the Outcomes of Youth with Disabilities up to 4 Years after High School. A Report of Findings from the National Longitudinal Transition Study (NLTS) and the National Longitudinal Transition Study-2 (NLTS2). NCSER 2010-3008." National Center for Special Education Research (2010).

students with transitions. Perhaps the most difficult barrier for students and families is the lack of information about accommodation requirements, transition services and specialized programs, which can severely limit the educational opportunities for this population. Improved access and persistence for students with disabilities could result from strengthened partnerships with the Virginia Department of Education that improve transition services and provision of information about available resources and programs.

Goals:

1. *Develop guidelines for accommodation practices, including, but not limited to:*
 - a. *Standardized testing.*
 - b. *Enhanced consistency across and within institutions.*
 - c. *“Regulatory relief” for students’ utilization of accommodations, reducing barriers to access.*
 - d. *Systematized information about accommodation practices.*
2. Develop budget recommendations for the 2023 General Assembly. Potential examples:
 - a. Expand the number of Comprehensive Transition and Postsecondary Programs in Virginia.
 - b. Recommendations identified by Council, the Committee and other stakeholders.
3. Explore the feasibility of actions to assist students with the transition from K-12 to higher education. Potential examples:
 - a. Implement final summary assessments of student experiences and postsecondary accommodations for secondary students with an Individualized Education Program (IEP) that can be used to help higher education institutions establish postsecondary accommodations for students.
 - b. Pathways partnerships between districts/schools and higher education institutions with a specific focus on disability issues.

C. Success in Higher Education

Students with disabilities complete their degrees at a considerably lower rate than their non-disabled peers.⁶ Several factors contribute to this phenomenon, including—as referenced above—variegated and sometimes poorly understood standards for documentation. Documenting a disability as an adult takes time, considerable funds, and the psychological and logistical challenges of maintaining these accommodations can itself constitute a barrier to success. Students with disabilities have increased responsibilities in a higher education setting, and must advocate for their accommodations in every class, every semester. Each additional financial and psychological cost for documentation and advocacy puts less-resourced students at a further disadvantage. For students, it can mean making the choice between purchasing required textbooks or documenting their disability, and allocating time to the bureaucratic process or attending class.

Institutions can also face resource challenges when it comes to managing accommodations requests in a timely manner. Oftentimes, there is a “crunch” before midterm exams when students overwhelm the disabilities services office with requests. Some schools simply lack the staff, training and tracking tools to keep up with demand and maintain accountability. Schools may also lack the resources to supply evolving technology aids.

Goals:

1. *Explore funding and statutory basis for enhanced universal training for university faculty and staff. Potential examples:
 - a. *Accommodating students with disabilities, including in online courses.*
 - b. *Universal design principles for incorporating accommodations into curriculum design.**
2. *Investigate the feasibility of developing and sharing transportable documentation between and within institutions of higher education to reduce unnecessary duplication of efforts by students seeking accommodations.*
3. Identify and assess emerging technology and statewide cost-sharing initiatives for potential use and adoption.
4. Develop guidelines for ensuring that students and parents understand their options for enabling parental support.

⁶ Newman, Lynn, Mary Wagner, Renee Cameto, Anne-Marie Knokey, and Debra Shaver. “Comparisons across Time of the Outcomes of Youth with Disabilities up to 4 Years after High School. A Report of Findings from the National Longitudinal Transition Study (NLTS) and the National Longitudinal Transition Study-2 (NLTS2). NCSER 2010-3008.” National Center for Special Education Research (2010).

Access to and successful participation in higher education enables greater participation in the workforce, independent living, integration in society, and better health outcomes. Obstacles that hinder access and successful participation are most likely to reduce participation in the workforce and increase reliance on social services. Therefore, it is imperative that the Commonwealth of Virginia collect data on students with disabilities and align its policies and resources strategically to improve access and persistence in higher education.