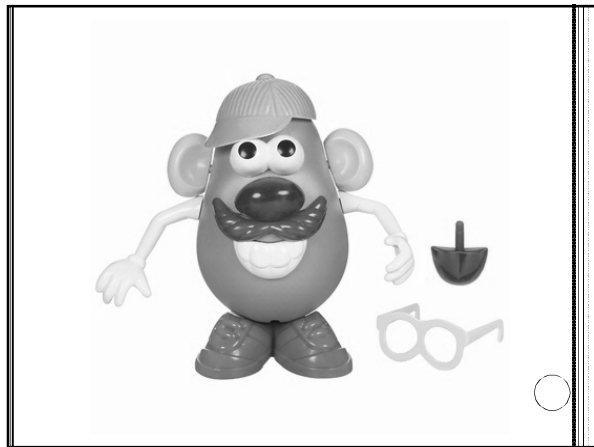


**DOCUMENTATION GONE GREEN:
OPERATING THE DS OFFICE WITH
NOMINAL NEED FOR
DOCUMENTATION**

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GOALS FOR TODAY'S SESSION

- o Discuss why we, the DS field rely so much on documentation
- o Propose arguments for a change in documentation practices
- o Review Eastern Michigan University's journey to change documentation policies

**OPEN DISCUSSION –
WHY DOCUMENTATION?**

- o Why do we as a higher education disability services field use and rely on documentation?
- o Why do we find it to be necessary to use documentation as a fundamental component of our decision making processes?



**BASIC RESEARCH ON HISTORY OF
DOCUMENTATION SUGGESTS...**

- o Lots of issues led to development of documentation standards currently known today
 - Murky guidance from ADA
 - DS field essentially building from ground up in 80's and 90's
 - Employment created its own practices
 - ETS created policies
 - 1997 AHEAD Documentation Guidelines




**THE DOCUMENTATION EFFECT ON
STUDENTS**

- o Documentation often requires money to obtain ...those with money get documentation
- o Documentation is often the gateway to access...no documentation, no service
- o Documentation may become the student's story when policy applied rigidly...the paper is more important than the student




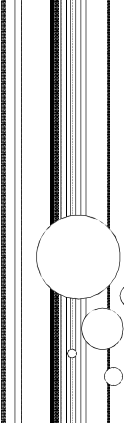
ROLE PLAY I: RELYING ON DOCUMENTATION



THE STUDENT SCENARIO

- o September --- first year student with history of ADD
- o Diagnosed at age 7
- o Used accommodations in high school
- o Last evaluation was freshman year of high school; works with psychiatrist for meds
- o Has sense for desired college accommodations (extra time for testing, note-taker, and audio books)





ARGUMENTS FOR A CHANGE IN DOCUMENTATION PRACTICES

**SOCIAL WELFARE VS.
SOCIAL JUSTICE**



BROAD SOCIAL WELFARE CONCEPT

- o Social welfare is about how people, communities and institutions in a society take action to **provide certain minimum standards and certain opportunities.**
 - It is generally about helping people facing contingencies and **who may not have opportunity otherwise**
- o **Provision of assistance to persons in need**
- o Actions or procedures striving to promote the basic well-being of **individuals in need**



**THE SOCIAL WELFARE MODEL AS
SEEN IN DS FIELD**

- o Sort, label, and determine need eligibility
- o Retrofit activities to fit needs (accommodations)
- o Offer segregated or parallel services
- o Disabled students are the needy clients
- o Disabled students ask to be included in a system (such as classroom) or society that does not fit the individual otherwise



DOCUMENTATION AS A REFLECTION OF SOCIAL WELFARE

- o Social welfare models use a functional definition to:
 - Qualify for services
 - To identify the category of persons that can be treated apart (segregated) from the mainstream of society
- o Social welfare models require people to disclose their inabilities or problems in order to gain access to special services



BROAD SOCIAL JUSTICE CONCEPT

- o Based on the concepts of human rights and equality
- o Demands that people have equal rights and opportunities
 - Everyone, from the poorest person on the margins of society to the wealthiest deserves an even playing field.
- o Full inclusion, participation
- o Freedom from discrimination



HOW THE DS FIELD COULD INCORPORATE THE SOCIAL JUSTICE MODEL

- o Open doors and include everyone, those with and without disabilities (universal design)
- o DS offices could be best practices for inclusive culture
- o Students with disabilities are naturally included when this model operating in full



DOCUMENTATION AS A REFLECTION OF THE SOCIAL JUSTICE MODEL

- o Open Discussion: How might the role of documentation change in a DS field that operates the social justice philosophy?



MEDICAL MODEL OF DISABILITY VS. SOCIOPOLITICAL MODEL OF DISABILITY



THE MEDICAL MODEL'S CHARACTERISTICS

- o Disability is a deficiency or abnormality
- o Being disabled is negative
- o Disability resides in the individual
- o The remedy for disability-related problems is cure or normalization of the individual
- o The agent of remedy is the professional who affects the arrangements between the individual and society with focus on the person



THE SOCIOPOLITICAL (SOCIAL)

MODEL SUGGESTS:

- Disability is a difference
- Being disabled, in itself, is neutral
- Disability derives from interaction between individual and society
- The remedy for disability-related problems is a change in the interaction between the individual and society
- The agent of remedy can be the individual, an advocate, or anyone who affects the arrangements between the individual and society



THE MODELS AND DOCUMENTATION

- Documentation seemingly promotes the medical model of disability
 - Documentation gives:
 - Deficiency information
 - Places problem within the person
 - Offers recommendations as to how person can cure self (so as to adjust to society)
 - Asks professionals to be the change agent

Is that the model that we want to promote through the work we do in our offices?



FISHING FOR DOCUMENTATION



YOU NEVER KNOW WHAT YOU ARE GOING TO CATCH

- o While our field and our institutions often have documentation guidelines, what we get varies greatly due to:
 - Quality of practitioners in the field
 - Practitioners commitment to the documentation process
 - Hesitation to share information due to HIPAA
 - Financial means of the student/family
- o How much energy do we spend trying to catch what we want per our own created policy?



THE DOCUMENTATION CAFETERIA LINE




STUDENTS AND DS OFTEN PICK AND CHOOSE WITHIN THE DOC

- o Students often want certain listed accommodations but not others
- o DS offices may not accept functional limitation information or recommendations that would create unreasonable accommodations




WHO IS RECEIVING THE DS RESOURCES?




THE STUDENT IS ONE PRIMARY RECIPIENT OF DS RESOURCES

- Our goal is to provide access to students through the establishment of an accessible environment
- The student should be an active part of this process when the environment is not accessible
- Documentation can potentially interfere with these goals and roles:
 - Minimizes the student's voice
 - Keeps focus on the student, not the environment



STUDENT AS "THE EXPERT"

- Students often have the info that we need to coordinate accommodations
 - We just need to ask the right questions
 - The trial-and-error process can actually enhance the student's buy-in and use of accommodations because they were actively involved in the outcome



THE CAMPUS ENVIRONMENT IS A PRIMARY RESOURCE RECIPIENT

- o As long as we promote a critical need for documentation as the gateway to services, we are subsequently telling faculty, Student Affairs, and all other campus stakeholders that the disability problem resides within the individual
 - Students need to prove themselves worthy of necessary changes



WHO IS IN CHARGE AROUND HERE?



IS IT DS OR THE 3RD PARTY PROVIDER?

- o When we place a premium focus on documentation as a critical component in the decision making process, how does that influence the perceived role and expertise of the DS professional in the eyes of...
 - The student and the family?
 - The faculty?
 - Other campus stakeholders?

Do we short-change ourselves as a result?



**REMEMBER WHEN THE WINDS BLEW
AND THE WATER FLOODED THE
DOCUMENTATION AWAY?**

**IN RESPONSE TO HURRICANE
KATRINA'S DISPLACEMENT OF
STUDENTS...**

- The DS field through the efforts of AHEAD created informational interview processes to collect the necessary data that affected students could not otherwise provide
- We did it before for the select few and said it was okay...so why not do it now for all?

**WHAT ABOUT THE STIGMA
ASSOCIATED WITH DISABILITY?**

BARRIERS TO STUDENT USE OF DS RESOURCES

- Identity issues
 - Desire to shed high school identity
 - Do not want disability to be part of identity
- Desire to avoid negative social reactions
 - Not wanting to be singled out
- Insufficient knowledge
 - Question fairness of accommodation process



MORE BARRIERS

- Perceived quality and usefulness of services
- Negative experiences with professors regarding disability and accommodations

Marshak, L. et al. (2010). Exploring barriers to college student use of disability services and accommodations. *Journal of Postsecondary Education and Disability*, 22(3), 151-165.



WHAT THESE BARRIERS MEAN IN REALITY/PRACTICE

- If someone walks into our office, that should tell us something
- We coordinate a resource that few really want to use because of our culture's stigma
- We need to place a level of trust in every student who walks into our office
 - Assume they are coming for the right reasons



**AS STATED IN SECTION 504 AND THE
ADA**

REGARDING DOCUMENTATION...

- o Nothing...there are no documentation requirements!!!
- o Midwest OCR representative during Michigan AHEAD 2010 conference stated that documentation was not a necessary component to coordinate academic accommodations

THE ADA

SHIFTING THE FOCUS

- o “The ADAAA thus restores the original intent of the ADA that the focus should be whether an individual with a disability, which was intended to be a very broad category, is being granted equal access through reasonable accommodations and modifications.”



- o “The broad standard is demonstrating that the person has a disability...Once disability is established, it is incumbent on the entity to consider reasonable accommodations and modifications to ensure equal access.”
- o “The new ADAAA has made adherence to rigid documentation guidelines no longer legally defensible.”

Shaw, S. F. et al. (2010). Disability documentation, the americans with disabilities act, and the summary of performance: How are they linked? *Journal of Postsecondary Education and Disability*, 22(3), 142-150.



DOCUMENTATION IS A POLICY THAT THE DS FIELD CREATED



NO WHERE DOES 504 OR THE ADA TELL US SPECIFICALLY...

- o How many days in advance students have to give letters of accommodation to instructors;
- o When students need to notify testing centers of upcoming exams;
- o By when note-takers need to be identified;
- o Specifically how alternative media is to be provided to students;
- o DS documentation practices, etc. etc. etc.

Jane Jarrow: "If it is a policy you made, it is a policy you can modify."



AS A FINAL POINT...



IF NOTHING ELSE MAKES SENSE...

- o Maybe, just maybe less documentation is just the logical, appropriate, RIGHT thing to do
 - No other group of citizens has to prove themselves as being in a protected class that is indeed eligible for protection...can't we do the same for people with disabilities through methods other than documentation?



ROLE PLAY II: RELYING ON PROFESSIONAL EXPERTISE


THE STUDENT SCENARIO

- o September --- first year student with history of ADD
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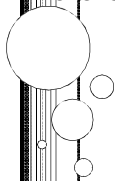
ANY THOUGHTS PERTAINING TO ANY OF THE ARGUMENTS?

So...

- o Given all of these points of view, why not scale back on the documentation requirements?
- o And if scaling back some, why not go all the way and eliminate the need whenever feasible?




**EASTERN MICHIGAN UNIVERSITY'S
YEAR LONG JOURNEY TO MINIMIZE
DOCUMENTATION AS A CRITICAL
NEED FOR
DECISION-MAKING**



PAST EMU DOCUMENTATION POLICY

- o Need documentation within 3 – 5 years
- o Generally resembled AHEAD Best Practices for Documentation
- o Students without the documentation in place could not proceed with accommodations
 - Approximately 20+ students per semester came to office, were told to get documentation, but never returned



GAINING NECESSARY SUPPORT FOR CHANGE

o Ran the idea by:

- Supervisor
- Legal Affairs
- Campus Counseling Center
- Faculty Senate
- DRC Faculty Advisory Committee



STAKEHOLDER THOUGHTS

- o How will you maintain consistency in decision-making?
- o What about those outlier, unique situations?
- o Are you going to be diagnosing people with disabilities?
- o It is best to be in the middle of the pack than at the head of the pack in policy development
- o Ultimately, everyone was supportive and trusted our expertise to develop a system that would work



THROUGH GUIDELINES AND PROCESSES, OUR DECISIONS WOULD IDEALLY:

- o Be professional judgments of reasonable accommodations based on all collected information for the given situation
 - Judgment is on the reasonableness of accommodations fitting the situation...not a judgment on the disability, including diagnosis



INITIAL GUIDELINES PROPOSAL

KEY ELEMENTS

Create our own “documentation” through consideration of:

- Past History Self-Report
- Environment’s Incompatibility with Disability
- Current and past treatments, medications, auxiliary aids, assistive devices, and utilized resources

Past History from Self-Report includes:

Successful & unsuccessful experiences with:	Students' description of conditions as they understand them:
<ul style="list-style-type: none"> <input type="checkbox"/> Barriers/problem situations <input type="checkbox"/> Adjustments/accommodations <input type="checkbox"/> Adaptive devices <input type="checkbox"/> Assistive services <input type="checkbox"/> Compensatory strategies <input type="checkbox"/> Collateral resources 	<ul style="list-style-type: none"> <input type="checkbox"/> Identification of situation: <ul style="list-style-type: none"> <input type="checkbox"/> Formal taxonomy <input type="checkbox"/> Descriptive narrative <input type="checkbox"/> Exemplars <input type="checkbox"/> Cyclical or episodic nature of impacts <input type="checkbox"/> Known/suspected environmental triggers <input type="checkbox"/> Date of original diagnosis <input type="checkbox"/> Date of last evaluation

Understanding of Environmental Impact of Disability

In Classes	On Evaluations	During Homework	Under Time Constraints	During Other Times
Listening	Tests	Reading	Timed tests	Transportation
Note-Taking	Papers	Writing	Short-term deadlines	Object manipulation
Speaking	Oral Projects	Calculating	Long-term assignments	Social interactions
Writing	Group Projects	Typing	Schedule management	Housing
Typing	Presentations	Research	Managing Frank's Week	Campus activities
Sitting	Lab assessments	Concentration	Emotions	Sleep
Attendance	Experiential setting	Time management	Mindset	Healthy lifestyle

TWO AREAS OF ACCOMMODATION

- Separated accommodations into one of two categories:
 - Environmental Adjustments
 - Would not require documentation if we felt enough appropriate information was collected during initial discussion with student
 - Policy/Procedure/Practice Adjustments
 - Would require documentation



OUR INTERNAL DISCUSSION ON INITIAL PROPOSAL

- Ultimately, we felt that if we were going to go this far, why not go farther?
 - Let's eliminate the need for documentation even more when appropriate.
- This proposal was never actually implemented but was critical for ultimate development of our policy



**WINTER 2010 GUIDELINES
(USED JANUARY – APRIL 2010)**



KEY ELEMENTS

- Create our own “documentation” through consideration of:
 - Past History Self-Report
 - Environment’s Incompatibility with Disability
 - Current and past treatments, medications, auxiliary aids, assistive devices, and utilized resources
- Assessed clarity, internal consistency, and observed behaviors of student during initial discussion



DOCUMENTATION’S ROLE

- Not necessary for someone with recognizable physical disability so long as accommodations reasonably correlated
- Not necessary upfront for someone with sound self-report history **but would ask to submit by end of semester**
- Case-by-case for someone with no prior reported disability history
 - May or may not require documentation to initiate (temporary accommodations) **but would require ultimately**



RATIONALE FOR THESE GUIDELINES

- Allowed us to safely test the waters with life jackets on
 - Did not require documentation upfront whenever possible
 - Had the “out” if the policy was not going well
 - We indicated up front that we would need documentation in order to coordinate accommodations for future semesters



WHAT WE LEARNED

- Refreshing to go through initial discussion without focus on documentation
 - Allowed focus to be on the student and on the environment
- Students were immediately more relaxed about the process
- We have the individual and collective expertise to make decisions regarding reasonable accommodations
- Consistency perhaps more possible because we were the lead decision-makers, not the varied quality of documentation
- Working with students without prior disability history were the most challenging

MAY 2010 REVISION

KEY ELEMENTS

- Maintained key elements from Winter 2010 Guidelines
- Outlined when accommodations not reasonable at an individual and an institutional level
- Built in something reflective of Response to Intervention (RTI) for those without prior disability history

DOCUMENTATION'S ROLE

- o Not necessary for people with visible disabilities so long as requests correlate with disability
- o Not necessary for people with invisible disabilities so long as requests correlate with obtained history and other information
- o Highly recommended and potentially necessary for someone with no clear history of disability and accommodation use



- o For students with invisible disabilities without a reported prior history, the decision would be to either:
 - A) Coordinate accommodations immediately with referral for assessment OR
 - B) Refer for assessment if information not aligning with need
- o When Option A, student must provide documentation or meet with advisor to continue with accommodations
 - Option to extend accommodation use without documentation



CREATED INTERNAL AND PUBLISHED GUIDELINES

- o Internal guidelines include:
 - Key elements used to collect student information
 - Differentiation among visible and invisible disability situations
- o Published guidelines do not have above information
 - Believe it may help to maintain level of integrity in the process



CURRENT MINDSET

- Feel comfortable with practice in place
- See students in a different way without so much focus on the label and their needs
- Eye-opening to see parent responses during this new student registration period
- Our energies are not being wasted on documentation collection and critical scrutiny
 - Focus is on students, environments, accommodations, and quality resources
 - Go green when gray as much as possible



NEXT STEPS

- Monitor policy for the next academic year
- Slowly begin to explain the core reasons behind this shift to the campus community
 - Work on changing the social construct of disability
 - Place focus on environment, not the student



QUESTIONS???
OPEN DISCUSSION

