

Gallaudet University OSWD Policy Guidelines: Accommodations for Distance Learners, for Students & Faculty

1. **Statement on Accessibility to Distance Learning**

Gallaudet University and its Office for Students with Disabilities (OSWD) is committed to providing a rich and comprehensive learning experience for all distance-learning students taking online courses from Gallaudet. The core of our policies for ensuring equal access is shared expectations between distance learners and faculty teaching online about how course material will be presented in a manner that is consistent and accessible to all our students.

2. **Expectations**

OSWD is collaborating with students, faculty, and other Gallaudet departments in an ongoing process, to develop requirements for universally designed web courses that meet a reasonable and consistent level of accessibility. (See “Accessibility and the Law” below.) With such a standard in place, students and faculty alike share expectations about the accessibility of online course materials that facilitate a successful educational experience between student and faculty. These are the foundational expectations:

- **Reasonable Prerequisites:** The faculty can reasonably expect that a distance learner, about to take a course online, will have his/her own computer and internet connection, basic computer literacy, and essential assistive technology that already allows the student to use accessibly designed web sites.
- **Students:** The student can reasonably expect that an online course will be prepared and delivered in such a way that it meets a standard and consistent level of accessibility, known to the student before the course begins.
- **Faculty:** Faculty teaching an online course can reasonably expect that a student will be able to access and complete a course prepared and delivered in accord with the accessibility requirements.

3. **Accommodations for Distance Learners**

OSWD strives to implement accommodations for distance learners that are as consistent with those for resident students as possible. Policies and procedures found in the “OSWD Handbook for Students, Faculty, and Staff” (“HDBK” below; a copy is online at the Gallaudet website in the OSWD section under “General Information”) are the foundation from which we are developing procedures for distance learning, distance learners should refer to the relevant section of the handbook and follow those procedures.

- **Disclosing Disabilities:** Requests for accommodation from distance learners require the same level of disclosure as for resident students: the same disclosure forms be submitted and approved, following the same procedures, as for resident students. (HDBK Section 2.4)
- **Intangible Accommodations:** Non-material accommodations, such as extra time to complete assignments that can be made available to distance learners in substantially the same way that it can be offered to resident students, will be made. (HDBK, Section 2.6)
- **eBooks, Braille texts, and Large-Print books:** These accommodations, where the materials are required for a specific online course, will be offered to the distance learner using the same procedures used by resident students, although additional time will be required to deliver physical materials. (HDBK Section 2.7)

- **Hardware and other Tangible Accommodations:** Gallaudet cannot reasonably provide assistive hardware in the same way that it can to resident students. In some cases, however, assistive hardware may be available through an Assistive Hardware Lending Library. If it is available, arrangements may be made to loan hardware to a distance learner on a first-come, first-served basis. Standard OSWD procedures for disclosure, documentation, and requesting accommodation must still be followed.
- **Human Assistants:** Accommodations such as assistance from sign interpreters and note takers can be provided to resident students thanks to help from other resident students, but such accommodations are generally not available to distance learners.

4. **Tips for Students**

Is Distance Learning Right for You?

Many students with disabilities feel that studying online will be the solution to their accommodation needs. You may be considering online study for the same reasons. What you need to be aware of is that studying online solves some problems but may create new ones, which may need different accommodations. You should enroll in an online course only after you have taken the time to consider carefully the requirements of the course, along and your strengths and weaknesses.

Online study creates the need for accommodations that are different from those for traditional, in-class study, which makes determining which accommodations you wish to request a unique process. Your request should be based on a review of the functional limitations of your disability.

Disability affects each student differently, depending largely on your ability to compensate for its effects. Areas of difficulty may be:

- comprehending written instructions
- participating in online discussions
- viewing online video postings
- managing your time to complete assignments
- others unique to your situation.

All accommodations are determined on a case-by-case basis with the information you provide to OSWD and the accommodations you have requested.

While the most requested accommodation is extended time for individual assignments, students do request others based on their needs. Accommodations can range from increased access to the instructor to follow-up communications to summarize and/or clarify information posted in the online course space. It depends on your unique disability and compensatory strategies.

To help decide whether online study and distance learning is right for you, ask yourself these questions:

- How well do I manage my time?
The independent nature of online study requires a firm grasp on your ability to manage your time. You will be required to set a regular study schedule, keep track of assignments and due dates, as well as participate in online discussions. This may be more difficult without regular, in-person reminders from a faculty member. This requires discipline to ensure that the course is not forgotten in your day-to-day activities.

- Does my disability affect my ability to process and comprehend written information?
For individuals with certain disabilities, managing the content, directions and discussion in an online course can be difficult. Information in an online course is frequently delivered via written material through a website. The instructor will not be immediately available to provide clarification for any misunderstood concepts or assignments.
- How comfortable am I with computers and technology?
It is important to be aware of your current comfort level with technology and computers. Accessing all course information and instruction in an online format may be more intimidating and stressful than engaging in guided independent study. Knowing your comfort level with computers and technology will allow you to determine whether or not online study is for you.
- What do I expect of the online study?
It's important to be aware of your expectations of the online study. What kind of interaction are you expecting from the instructor? Are you expecting a lot of personal interaction or a little? Do you think that you will have a lot of writing to do or not as much? What information are you basing your expectations on? You should find out as much as possible about the format of the online study, the expectations the instructors have of you and what you need to do to successfully complete the course. The more information you learn about the study prior to enrolling and beginning it, the better you can determine if online study is for you.

Requesting Accommodation

Procedures for requesting accommodations are the same for distance learners as for resident students. Necessary forms can be submitted by mail or by FAX; at this time the University has no way to accept electronic signatures. Please refer to the "OSWD Handbook for Students, Faculty, and Staff" for details.

5. **Tips for Faculty, Course Designers, and Implementers**

The design of a distance-learning class affects the participation of students and instructors with various disabilities in various ways. Planning for access as the course is being developed is much easier than creating accommodation strategies once a person with a disability enrolls in the course or applies to teach it. Simple steps can be taken to assure that the course is universally accessible by design.

"Universal design" is defined by the Center for Universal Design at North Carolina State University as "the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design." General goals include:

- the design is usable by people with diverse abilities;
- the design accommodates a wide range of individual preferences and abilities;
- the design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities; and
- the design can be used efficiently and comfortably, and with a minimum of fatigue.

Distance-learning courses are designed to reach out to students who may be located anywhere. If universal design principles are used in creating these classes, they will be accessible to all students who enroll in them. Designed correctly, distance-learning options create equal learning opportunities for all students; designed poorly, they erect new barriers to equal participation. Employing universal design principles can bring us closer to making learning accessible to anyone, anywhere, at any time.

Gallaudet Resources

For questions related to Blackboard (Gallaudet's online learning management system) and other issues related to presenting course online, the principal contact is Shannon Augustine, Manager, eLearning and Web Authoring, part of Gallaudet Technology Services, Earl Clayton Parks, Jr., Executive Director.

For questions concerning universal design and related issues in web-based courses, the principal contact is Cherisse Gardner, Coordinator, Instructional Design Services.

Internet-Based Communication

Some distance learning programs employ real-time chat communication in their courses. In this case, students communicate synchronously (at the same time), as compared to asynchronously (not necessarily at the same time). Besides providing scheduling challenges, synchronous communication is difficult or impossible for someone who cannot communicate quickly. For example, someone with a learning disability who takes a long time to compose her thoughts or someone whose input method is slow may not be fully included in the discussion. In addition, some chat software erects barriers for individuals who are deaf-blind or have low vision. Instructors who choose to use chat for small-group interaction should select chat software that is accessible to those using screen readers and plan for an alternate method of communication (e.g., email) when not all students in a group can fully participate using chat.

Text-based, asynchronous resources such as electronic mail, bulletin boards, and listserv distribution lists generally erect no special barriers. Email communication between individual students, course administration staff, the instructor, guest speakers, and other students is largely accessible to all parties, regardless of disability.

Web Pages

Applying universal design principles makes web pages accessible to individuals with a wide range of disabilities. In 1999, broad guidelines for making web pages accessible were developed by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). More recently, the United States Architectural and Transportation Barriers Compliance Board (Access Board) developed accessibility standards for web pages of Federal agencies, as mandated by Section 508 of the Rehabilitation Act Amendments of 1998. The standards provide a model for other organizations working to make their web pages accessible to the broadest audience.

There are basically two approaches for making web page content and navigation accessible. Certain types of inaccessible data and features need to be avoided, or alternative methods need to be provided for carrying out the function or accessing the content provided through an inaccessible feature or format. For example, a distance-learning designer can avoid using a graphic that is inaccessible to individuals who are blind, or he can create a text description of the content that is accessible to text-to-speech software.

Web pages for a distance learning class should be tested with a variety of monitors, computer platforms, and web browsers, including a text-only browser, such as Lynx, or a standard browser with the graphics and sound-loading features turned off (to simulate the experiences of people with sensory impairments). Testing to see if all functions at a website can be accessed using a keyboard alone is also a good accessibility test.

Video Interface on the Web

Gallaudet University's online learning-management system, "Blackboard", has been updated to include visual communication as a built-in feature, making it Section-508 compliant. The software enhancement

now supports computer webcams so that video communication and responses may now be used where previously only text-based communication was possible.

Printed Materials

Students who are deaf-blind, have low vision, or who have specific learning disabilities that affect their ability to read may require that printed materials be converted into Braille, large print, or eBook formats. Making the content of printed materials available in an accessible web-based format may provide the best solution for students who cannot read standard printed materials.

Printed materials may be prepared and distributed by OSWD to distance learners following the same procedures as for resident students, although additional lead time will be necessary to reach off-campus locations.

6. **Accessibility and the Law**

The Americans with Disabilities Act (ADA) of 1990 mandates that no otherwise qualified individuals shall, solely by reason of their disabilities, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in public programs. The ADA does not specifically mention online courses, but the United States Department of Justice and the U.S. Department of Education's Office for Civil Rights have clarified that the ADA applies to Internet-based programs and services.

A recent settlement agreement between the Department of Justice and Louisiana Tech University (2013) mandates that, in post-secondary education:

...all technology, including websites, instructional materials and online courses, and other electronic and information technology for use by students or prospective students, is accessible.

Further, the Office for Civil Rights of the Department of Education clarified in an earlier agreement (also 2013) with the South Carolina Technical College System:

"'Accessible' means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with *substantially* equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, it still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology."

7. **Sources**

Settlement Agreement between the United States of America, Louisiana Tech University, and the Board of Supervisors for the University of Louisiana System under the Americans with Disabilities Act, US Department of Justice document number 204-33-116, 23 July 2013; <http://www.ada.gov/louisiana-tech.htm> .

Resolution Agreement : South Carolina Technical College System OCR [Department of Education's Office for Civil Rights] Compliance Review No. 11-11-6002, US Department of Education, 28 February 2013; <http://www2.ed.gov/about/offices/list/ocr/docs/investigations/11116002-b.pdf> .

“Accommodations for Online Courses”, © 2013 Empire State College; <http://www.esc.edu/disability-services/student-handbook/accommodations-overview/online-courses/>

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