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ABSTRACT

This report discusses the needs of postsecondary education students who are deaf or hard of hearing and presents strategies for ensuring educational accessibility to campus services and programs. Part 1 considers general issues which characterize the process of student development in postsecondary education. It closes with the a brief discussion of strategies for fostering student development. Part 2 focuses on the full access and engagement of students who are deaf and hard of hearing in campus life, with general recommendations for communication and language access, barrier-free facilities, and programmatic initiates. These are applied to eight common campus life programs and services: college union facilities, housing, health services, recreational sports, judicial and campus safety programs, programs for students from diverse ethnic and racial backgrounds and international students, programs for commuter students, and accessing off-campus community resources. Recommendations include: (1) providing appropriate interpreting support and/or assistive listening systems; (2) installing appropriate visual alert fire alarms in all facilities that house student activities; (3) offering a special interest deaf and hard of hearing residence floor; (4) using universally agreed upon and stated visual signals in all competitive play; and (5) providing direct TTY access for on-campus emergency phone numbers. (Contains 20 references.) (CR)

National Task Force on Quality of Services
in the Postsecondary Education of
Deaf and Hard of Hearing Students

Report on
CAMPUS LIFE AND THE DEVELOPMENT OF POSTSECONDARY DEAF AND HARD OF HEARING STUDENTS: PRINCIPLES AND PRACTICES

National Task Force on Quality of Services in the
Postsecondary Education of Deaf and Hard of Hearing Students

CAMPUS LIFE AND THE DEVELOPMENT OF POSTSECONDARY DEAF AND HARD OF HEARING STUDENTS: PRINCIPLES AND PRACTICES

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Editor's note

This is one in a series of reports intended to assist postsecondary institutions in developing and maintaining special services of quality as needed by their deaf and hard of hearing students. Each report has been prepared with postsecondary administrators, faculty, and staff uppermost in mind, and particularly those most likely to have a role in providing services to these students. It is anticipated that these reports will be useful also to deaf and hard of hearing students in gaining more information about services for which they may be eligible.

A challenge in authoring and editing each of these reports is to avoid giving the impression that all the information they contain pertains equally to all deaf and hard of hearing students at the postsecondary level. Of course this is not so. These students are individuals first, and their needs and wishes for special services and other accommodations will vary, as will characteristics of the particular colleges and universities they as individuals choose to attend.

Also, it is a challenge to write about needs and services for both deaf and hard of hearing students together. While they do share a hearing loss, the magnitude of their hearing loss ranges collectively from mild to profound. But while the special needs of deaf students may be more apparent than those of hard of hearing students, the special needs of hard of hearing students are no less real.

Twelve reports are scheduled for distribution in 1997-99, each with a different focus and each authored by a working committee of experts on a particular subject. All are members of a **National Task Force on Quality of Services in the Postsecondary Education of Deaf and Hard of Hearing Students**. This task force was formed in 1994 and numbers 100 members associated with 32 two and four-year colleges in 28 states and provinces in the United States and Canada.

Readers are free to cite information and views from each of the reports and to duplicate and share copies. In return, they are asked to cite the names of its authors and make bibliographic reference to the report.

– Ross Stuckless

CAMPUS LIFE AND THE DEVELOPMENT OF POSTSECONDARY DEAF AND HARD OF HEARING STUDENTS: PRINCIPLES AND PRACTICES

Jeff Porter, Renee Camerlengo, Maggie DePuye, and Mark Sommer[1]

Introduction

Postsecondary education generally centers on teaching/learning interactions and student progress within the formal curriculum, leading to degree completion and certification. This *formal arena* of postsecondary education enhances student development not only in the academic, intellectual, and career development domains, but in personal and social domains as well.

However, it would be a mistake to underestimate the tremendous educational impact and value of the *campus life* that surrounds and permeates this formal arena. Students, some more than others, engage in co-curricular activities, access a rich range of campus resources, and interact with faculty, staff, and peers throughout the broader campus community.

Campus life carries the same importance for deaf and hard of hearing students as for their hearing peers. The extent to which they are able to access and engage meaningfully in campus life programs and resources will influence fundamentally the overall richness and impact of their college experience.

In Part I of this report, we will consider some general issues characterizing student development in postsecondary education, closing this section with a brief discussion of strategies for fostering student development. Part I should provide a useful context for the discussion and recommendations pertaining directly to deaf and hard of hearing students that follow in Part II.

Part II of the report pertains to the full access and engagement of deaf and hard of hearing students in campus life, with general recommendations for *communication and language access*, *barrier-free facilities*, and *programmatic initiatives*. These will be applied to eight common campus life programs and services.

Part I. Student Development in the Broad Context

Soaring hopes and heavy expectations challenge postsecondary education these days. The defining purposes framing this challenge are an interesting mix of idealism and pragmatism (Bowen, 1977; Boyer, 1987; Knox, Lindsay & Kolb, 1993).

On the one hand, postsecondary education aims at nothing less than facilitating students' life-long pursuits toward intellectual, moral, and aesthetic fulfillment. And on the other, it focuses pragmatically on the short-term development and certification of the skills and knowledge that enable entry into the technical/professional work force and economic mainstream.

The mission of postsecondary education encompasses both the *wings* of individual growth and the *roots* of social utility. It simultaneously represents a liberating vehicle for personal development and one of the few means available for bridging the gap between the *haves* and the *have nots*.

Dimensions of student development

Given this framework of hopes and expectations, student development should be a major focus in postsecondary education. While student development at the postsecondary level is a complex construct, and resistant to single-factor conceptualizations (Ewell, 1991; Pascarella & Terenzini, 1991), most of its models are grounded in some common assumptions:

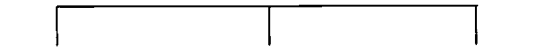
- Student development represents interdependent growth in various dimensions of personal and interpersonal functioning.

[1] In the order listed above, the authors are associated with National Technical Institute for the Deaf (Rochester, New York), Carnegie-Mellon University (Pittsburgh, Pennsylvania), Northern Illinois University (DeKalb, Illinois), and Essex Community College, (Baltimore, Maryland).

- Student development can be conceptualized as growth through a continuous sequence of stages, with successive stages representing progressively more differentiated means of analysis and progressively more integrated modes of resolution.
- Student development represents a lessening in the tendency to anchor values and actions in the judgments of others, and a strengthening in the tendency to frame such values and actions in terms of one's own belief system.

For the purposes of this report, student development is conceptualized as occurring across four primary dimensions: *intellectual*, *identity formation*, *interpersonal*, and *moral*. These are described briefly as follows (Moore, 1990; Morrill, Hurst & Oetting, 1980; Rodgers, 1989).

Intellectual dimension. William Perry's theory of intellectual development (Knefelkamp, Widick & Parker, 1978; Perry, 1970) was developed within a postsecondary context. The theory posits a continuum comprised of three major stages regarding the way individuals view knowledge and values.

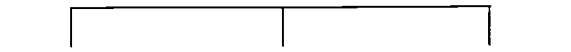


Dualism assumes a right-wrong, good-bad world. Students at this stage seek direction and "answers" from authority. Authority is embodied by faculty, who hold absolute "truths" that can be learned.

Multiplicity describes students who recognize that not all answers are absolute. Uncertainty about truth validates a diversity of opinion. At this stage, students view all opinions as equally valid in the absence of absolute truth.

Relativism, the third stage, reflects the insight that quality of thought can validate one intellectual viewpoint over another. Recognition of intellectually valid processes or systems of thought serves to screen out alternative positions and contributes to personal commitment toward selected viewpoints. Career decisions, lifestyle choices, personal relationships, and political and religious views are decided upon in relation to the quality of thought used in deriving them.

Identity formation dimension. Establishing a clearer and more stable sense of self is a critical developmental task for postsecondary students. Students entering college encounter numerous challenges that raise questions for them in their self-identity. In broad terms, identity formation can be conceived as three stages along the continuum noted below (Chickering, 1969; Thomas & Chickering, 1984).



Students at the *conforming* stage judge themselves harshly and tend to be "other-directed" as they seek to fulfill external expectations placed upon them.

As students move to the *experimental* stage, they try out new lifestyles and values and become less rigid in judging themselves and others. This lack of absolutes can also create ambiguity and dilemmas about self-identity.

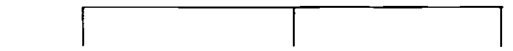
The *intentional* stage represents the beginning of resolving such major identity questions as "Who am I?" and "Who can I become?" The intentional self is rooted in internal beliefs rather than external expectations.

Interpersonal dimension. This dimension plays a critical role in student development. It is particularly critical for college students in establishing new interpersonal ties within new educational environments, beyond the familiar and secure spheres of family relations and long-standing friendships.

It is at once a pivotal source and a central mode of expression for a student's developing self-identity. It also is the means of establishing group identity and identity within the larger postsecondary institution. The interpersonal domain is the *mirror* we hold up to get a better look at ourselves and the *medium* we use in making contact with other social beings.

Based on the works of Chickering (1969) and Heath (1977), the Interpersonal Dimension in turn can be differentiated into three components: *Interpersonal Relatedness*, *Interpersonal Competence*, and *Social Perspective*.

Interpersonal Relatedness. This component refers to changes in the way students generally relate to others, not only with peers but also with people occupying a wide variety of roles in their lives.



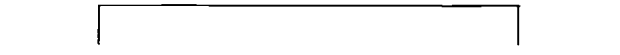
Self-Centered Role-Dominated Intimate

The *Self-Centered* stage refers to a focusing on one's own needs and interests, with interpersonal activities serving mainly to satisfy egocentric concerns.

The *Role-Dominated* stage represents a mild shift from egocentrism. The student now regulates interpersonal activities in terms of perceived norms, roles, and the expectations of others. However, similar to the most basic stage, interpersonal relations still have the primary purpose of self-confirmation.

The *Intimate* stage is the most advanced developmental position, representing interpersonal relations among students that are capable of interdependent and reciprocal satisfaction of one another's needs through non-defensive, spontaneous, and trusting interpersonal exchange. Affirmation of the other, as much as confirmation of the self, guides interpersonal relationships at this stage of development.

Interpersonal Competence. Interpersonal competence refers to managing oneself effectively in working with others, in order to accomplish a common task requiring joint efforts. It refers to that set of interpersonal behavior and attitudes commonly known as "teamwork skills".



Unilateral Imposition Collective Action

Two stages along this continuum can be conceived as *Unilateral Imposition* and *Collective Action*. Development along this continuum reflects a shift from using group projects for satisfying personal needs, to assessing and orchestrating the collective needs and strengths of the group in effectively accomplishing a common goal.

Social Perspective. This component refers to the way students interpret the diversity of people and cultures.

Ethnocentric Cultural Relativism Anthropocentric

This developmental continuum represents growth in tolerating and appreciating a wider diversity in people. It reflects a positive shift in openly responding to persons in their own right rather than exclusively in terms of stereotypes. Development along this continuum is sparked by a willingness to discount cultural preconceptions, is sustained by an awareness and appreciation for cultural differences, and is culminated by the insight that cultural differences are but variations of a fundamental humanity.

The *Ethnocentric* stage characterizes the student who unquestioningly believes his/her culture and background is superior to others.

Cultural relativism represents an increase in tolerance for cultural diversity and a lessening in cultural stereotyping. Also, at this stage there is a beginning appreciation for the basic linkage between cultural and personal identity.

The *Anthropocentric* stage represents realization of the common elements of humanity underlying all cultural variations, e.g., the need for communication, order, uniqueness, and collective identity. Cultural differences at this stage are valued as "localized expressions" of the common threads running through humanity.

Moral Dimension. Students can undergo many changes in their moral development throughout their postsecondary experience. They are exposed to diverse values and beliefs, and are challenged to make important decisions and choices having both short- and long-term consequences.

Kohlberg's theory of moral development (1981) presents in a useful way how individuals progress through stages in reasoning about moral issues and developing a greater sense of self in relation to others.

Egocentrism Sociocentrism Allocentrism

Kohlberg identifies three major stages of moral reasoning: *egocentrism, sociocentrism*, and *allocentrism.*

At the level of *egocentrism* (the preconventional level), the individual has very little understanding or concern for the rules and expectations of society, and

makes moral decisions primarily from a self-serving reference.

At the level of *sociocentrism* (the conventional level), the individual is able to identify with, and internalize, social rules and regulations in deciding upon issues of "right" and "wrong". Most people from adolescence through adulthood, including college students, typically reason at this level.

At the third level, *allocentrism* (the postconventional level), the individual is concerned with individual rights and collective responsibilities, and has a sense of self as part of a greater humanity, with a concern for consistently applying principles of justice. Resolving issues of "right" and "wrong" requires the application of such principles, rather than simply following established social rules and regulations.

Fostering student development

Based on an extensive review of *college impact* studies over a 20-year period, Pascarella and Terenzini (1991) summarized the following findings regarding the nature and dynamics of student development. We can assume that these findings apply to hearing, hard of hearing, and deaf students alike.

- Students develop in an integrated manner, with changes in one developmental dimension reinforcing and reflecting changes in other dimensions.
- Students make significant gains not only in factual knowledge and intellectual skills, but along a broad array of value, social, and moral dimensions as well.
- Students' psychosocial changes represent not only refinements in self-identity, but also advancements in how they engage and interact with other people.
- Students make significant advances in using principled reasoning to arrive at moral judgments.
- What students gain from their postsecondary experience is determined largely by the *level and quality of their involvement in both academic and non-academic activities throughout the campus community.*
- Students who take active responsibility for the significance and consequences of their postsecondary experience (instead of merely assuming the role of passive recipients of institutional effort) are most successful in furthering their own development.

Institutional resources, curricula, and reputation do not inevitably translate into student development (Astin, 1985; Pascarella & Terenzini, 1991). Moreover, student development does not necessarily signify institutional effectiveness; students can grow without having attended college X, Y, or Z.

In mobilizing institutional resources to support student development, the following principles have been found useful (Banning, 1980; Chickering, 1969; Morill, Hurst & Oetting, 1990; Pascarella & Terenzini, 1991).

- Development is facilitated when students experience challenges requiring novel responses, and when they are supported by their campus community in searching for effective new strategies free of earlier habits and preconceptions.
- Following the premise of *person-environment interaction*, students actively shape their postsecondary environment as much as they are shaped by it (with the development of important skills, values, and ways of seeing the world not so much happening *within* students as resulting from interactions *between* students and their environment).
- Individual differences, in terms of such personal characteristics as cultural and ethnic backgrounds, learning styles, and existing developmental levels, affect the meaning and outcome of all educational experiences.
- Designing campus living quarters that are responsive, rather than insensitive, to student development requires shared vision and intentional, collective action; as such it represents the central task of each member of the educational community.

Part II. The Development of Deaf and Hard of Hearing Students

Student development theory and research is meaningful only when it is grounded in and illuminates individual lives, such as those of Angela, Becky, Luke, and Christopher.

> **Angela** is the only person who is deaf in her family. She's had little exposure to Deaf culture or sign language. As she enters

college and explores her developing self-identity, she would benefit greatly from some support from campus life professionals in locating local, regional, and national "Deaf culture" resources.

Becky is deaf also. Unlike Angela, she uses American Sign Language (ASL), not English, as her native language. She needs "language access" and tutorial support in the Learning Center for extra help in a writing course she is taking.

Luke is hard of hearing. He's suddenly been inspired by the idea of joining with several other deaf and hard of hearing folks on campus, and maybe some interested people from the local community also, and establishing a college-sponsored ASL Poetry Club.

Christopher is hard of hearing. He feels that he's not a part of either the "deaf" or "hearing" worlds. He wants some support in figuring out how to meet interesting people and establish friendships.

Deaf and hard of hearing college students contend with all the same challenges as hearing students in terms of their growth along the four dimensions of student development described earlier, i.e., intellectual, identity formation, interpersonal, and moral.

However, the individual learning characteristics, background experiences, language and communication strengths and needs, and personal aspirations of deaf and hard of hearing students in negotiating and developing along these dimensions can vary widely. Such diversity exists not only in comparison to hearing students as a whole, but among deaf and hard of hearing students themselves as seen in the lives of Angela, Becky, Luke, and Christopher .

In the face of such diversity, the need for colleges to provide a widely differentiated array of support resources and educational experiences is evident. Sparking and helping to sustain the development of all individual students, including those who are deaf or hard of hearing, is a critical and ongoing challenge.

Deaf and hard of hearing students often face navigating the hidden rocks and sudden whirlpools of college life without the necessary tools and/or a responsive and supportive campus environment. The two and four-year college retention rate for deaf students is considerably lower than that for students who hear (Stinson & Walter, 1992). Also, consistent with research on the persistence of college students in general, their persistence in completing college involves the "interpersonal fit" between themselves and their campus environment as much as the presence or absence of academic difficulty (Scherer, Stinson, & Walter, 1987).

Reasonable accommodation: Obligation and commitment

Federal laws and regulations setting forth the legal obligations of postsecondary institutions for making reasonable accommodation in supporting the access and engagement of deaf and hard of hearing students in campus programs and resources are well established. In the closing section of this report, these are discussed and interpreted by Jo Anne Simon, a legal authority in this area.

However, we wish to emphasize here that the legal realm of *obligation* regarding the fulfillment of laws and regulations does not have the same logic or focus as the educational realm of *commitment* regarding student and community development. The fact that a college is doing what is "legally required" does not necessarily coincide with its doing "whatever is possible" in ensuring that deaf and hard of hearing students have full opportunity for engaging the array of educational resources and campus services that comprise a successful college experience. The former approach responds to an educational institution's legal requirements; the latter approach honors its defining purpose.

Some general guidelines that may assist colleges and students in establishing a supportive environment for deaf and hard of hearing students are noted below (see National Center for Law and Deafness, 1992; Porter, Rosenfield, & Spaull, 1995). They are organized according to the categories of *Overall, Communication and language access,* and *Programming for community membership.*

Overall

- Deaf and hard of hearing students require access to the same full range of postsecondary educational opportunities that are available to the general student population.
- Deaf and hard of hearing students have a right to special services and accommodations, tailored to their needs, in support of their educational progress at whatever college for which they are eligible and choose to attend.
- As active partners in realizing meaningful accommodations, deaf and hard of hearing students are responsible for "self-identifying" their need for accommodation.
- All college programs and services should be provided in a manner that affords full opportunity for meaningful interaction among hearing, deaf, and hard of hearing students, based on individual choice.

Communication and language access

- Colleges should provide "auxiliary aids and services" to ensure effective communication among hearing, deaf, and hard of hearing individuals, e.g., interpreters, assistive listening devices, written materials, TV with provisions for closed captions, other captioned media, telephones compatible with hearing aids, or TTYs.
- Colleges should install flashing fire alarms for public rooms and private living facilities, and flashing doorbells where needed.
- Colleges should ensure that campus-wide events such as graduation ceremonies, plays, and guest speaker programs are accessible to deaf and hard of hearing individuals.
- Existing theaters and other assembly areas should provide assistive listening systems (induction loop, infrared, or FM transmission devices) to facilitate effective communication for all.[1]
- On-campus emergency phone numbers should be directly accessible by TTYs (without relying on Relay Service).
- Communication devices offered to the college community in general, e.g., pay phones, should be accessible to deaf and hard of hearing individuals also.
- All such accommodations to ensure linguistic and communication accessibility for deaf and hard of hearing individuals should be provided free of charge to individual users.
- In choosing among alternative auxiliary aids and services to ensure linguistic and communication accessibility for deaf and hard of hearing individuals, colleges should give primary consideration to the preferences of these consumers.
- Steps to ensure linguistic and communication accessibility for deaf and hard of hearing individuals should not represent "undue burden" (in terms of significant difficulty or expense) for the college.

Programming for community membership

- Break down the "insider/outsider" dichotomy.

Whether in terms of gender, race, nationality, disability, or any other marginalized personal characteristic, an "outsider" is perceived as fundamentally different from the defining norms and beliefs of the "insider" culture. The rules of the game (and the assumptions supporting them) governing this insider culture have been established and refined over time without consideration of, or provision for, the differences personified by the "outsiders". It can be thus for a student who is hard of hearing attending a "hearing" college.

Access to the insider culture by an outsider too often means access to a setting rooted in traditions, and rewarding skills and perspectives not possessed by the outsider, while ignoring those traditions, skills, and perspectives the outsider brings. Gaining access to the insider culture usually obliges the outsider to learn and conform to the already established rules of the game. Outsiders are perceived as different, and changing the core assumptions and practices of the insider culture is typically viewed as inappropriate, if not heretical.

- Overcome the mindset of "inclusion through additive change".

Higher education's insider culture typically operates on the faulty assumption that inclusion is an additive, rather than transformative process. The thinking goes something like this: "We fulfill our moral obligation to include those historically excluded by creating special initiatives within our

[2] See the National Task Force companion report on assistive listening devices–Warick, R., Clark, C., Dancer, J., & Sinclair, S. (1997). *Assistive Listening Devices.* (Same source as present report.)

community to serve them" – whether that be a Woman's Studies concentration, a Minority Affairs Coordinating Committee, or an Office of Special Services for Students with Disabilities. Such initiatives are allocated a marginal piece of the college budget and/or curriculum, highlighted in brochures, and then held accountable for resolving controversy when mismatches between outsiders and the insider culture erupt.

The problem with this additive approach is that the core values and patterns that define the insider culture are not held up for examination or encouraged to evolve in response to the needs and strengths of the newly included community members. Historically excluded individuals *are* included, but it happens through their relegation to pockets of special interests around the fringe.

- Transcend the "politics of differences".

As described by Shelby Steele (1990), once outsiders gain access to the insider culture, they often deal with continuing institutional exclusion by converting their "difference" into a political force. Different racial, ethnic, gender, disability, and sexual orientation groups are then forced to assert their rights and compete with one another for power based on the single attribute that makes them outsiders in the first place.

All the while the values and practices of the core community remain unexamined and constant as the constituent outsider groups battle to win self-contained concessions that do nothing to change the insider culture. In the face of such unresponsiveness, cynicism among outsiders can grow, and the outsiders can disengage themselves from broader campus involvement. To avoid this, the collective college community should make an effort to transcend politics based on differences, including differences that stem from gradations in the ability to hear.

These general observations and suggestions can be turned to practical use with respect to the quality of campus life for deaf and hard of hearing students on a college campus. However, how they are implemented will vary considerably from college to college.

Recommended Practices

As indicated in the first report of this series, depending on their qualifications and other personal circumstances, deaf and hard of hearing students today can and do choose from a large array of colleges. In doing so, they will also be choosing among colleges that vary from large enrollments of deaf and hard of hearing students (two exceeding 1,000) and special programs for these students, to colleges without any known deaf or hard of hearing students. Deaf and hard of hearing students have good reason to expect more comprehensive "special" campus life services and resources in the former college settings than in the latter.

Rather than suggest only the basic campus life services and resources necessary for legal *compliance*, the authors have chosen to include those that also reflect extraordinary *commitment*. Many of the recommended practices that follow are more exemplary than basic. Also, it should be noted that some, though by no means all, of the noted features of campus life are more applicable to colleges that have student housing than to those that do not.

The general guidelines noted in the preceding section in turn can be translated into recommended practices.The following practices aim at ensuring quality experiences for deaf and hard of hearing students when interacting with the specific organizational areas of campus life noted below. Within each campus life area, they are organized around the issues of *Communication and Language Access*, *Barrier-Free Facilities*, and *Programmatic Initiatives*.

1. College Union facilities/Student activities
2. Housing/Residence Life
3. Health services
4. Recreational sports
5. Judicial and Campus Safety programs/services
6. Programs/Services for students from diverse ethnic and racial backgrounds and international students
7. Programs for commuter students
8. Accessing off-campus community resources

College Union facilities/Student activities

Communication and language access

- In areas where sound paging systems are used, visual electronic boards are installed and fully functional for important or emergency announcements.
- Student organization meetings are provided with appropriate interpreting support and/or assistive listening systems to allow for active participation by deaf and hard of hearing individuals.
- Food Services have readily available picture menus and/or paper-pen boards to provide convenient services.
- Minutes of meetings, announcements, Roberts Rules of Order, proposals, agendas, and/or policy/procedures handbooks are readily available in hard copy.

Barrier-free facilities

- Pay phones available for the general community in public spaces are accessible to deaf and hard of hearing individuals also (through amplification accessories and TTY couplings).
- Appropriate visual alert fire alarms are in all facilities that house student activities.
- Conference/meeting rooms and/or auditoriums/assembly rooms are equipped with operational assistive listening capabilities, e.g., FM and Loop systems.
- Accessibility signage for TTY, FM systems, etc., is easily visible in heavy traffic areas of the facilities.
- Services are readily available to provide hands-on technical support for assistive listening systems and other communication equipment.
- Leisure areas have adequate lighting for efficient visual communication, e.g., signing, speechreading.
- Entertainment rooms have adequate signage for instructions to access games.
- For deaf and hard of hearing individuals visiting the campus, local hotel accommodations include access to TTY, TV closed captioning, and a list of available and accessible services that may benefit deaf and hard of hearing visitors.
- On-campus stores and other stores in the vicinity of the college have cash register displays and instructions for acceptable forms of payment that are *visible* to customers.

Programmatic initiatives

- The staffs of various offices/departments are provided with in-service training about deaf and hard of hearing student characteristics, use of the relay service, and different communication modes.
- Programs and cultural activities which are sponsored to highlight and affirm the educational diversity of individual, ethnic, and cultural differences include reference to the broad spectrum of deafness as a cultural phenomenon.

Housing/Residence Life

Communication and language access

- Appropriate interpreting resources are provided at reasonable levels to meet a diversity of communication needs in order for students to participate in the independent living experience of a residential community.
- Where numbers and interests warrant, the Housing Office offers an academic option floor such as a special interest deaf and hard of hearing floor and a floor interpreter to facilitate communication among floor residents who are deaf, hard of hearing, or hearing and majoring in deaf-related fields.
- Fully functional electronic message boards are located in public areas where paging systems are utilized for important or emergency announcements.

Barrier-free facilities

- Public areas of residence halls are equipped with appropriately installed and fully functional visual fire alarms. Based on the number of deaf and hard of hearing students in the total student population, an appropriate proportion of private living units in the residence halls and campus apartments is equipped with correctly installed and functional visual fire alarms and visual door bell systems. For hard of hearing students in housing areas that are *not* equipped with visual alarms, the decibel level is regulated to ensure adequate auditory processing or portable visual fire alarms are available through the disability support services office.
- Well designed, visual signage facilitates unencumbered use of the facilities.

Programmatic initiatives

- *Activity planning* acknowledges the presence and needs of deaf and hard of hearing students and incorporates reasonable strategies to ensure accessibility, including closed captioning on public television, decoders for use with VCRs, TV listening devices, and interpreter support at events.
- Housing staff–such as residence hall directors, resident assistants, and security–are given in-service training concerning deaf and hard of hearing students, use of the relay service, and different communication modes.

Health Services

Communication and language access

- Qualified sign language interpreters are available at all levels of service, acute care, well appointments, clinical services, programs and workshops, etc.
- Diagrams and/or picture cards of ailments, symptoms, medications, etc. are available to complement the facilitation of communication.
- Direct TTY access for all call-in services is offered by the Health Center.

Barrier-free facilities

- *Reception areas* and emergency exits are clearly identified and instructions on how to access services are clearly defined and visible.
- Clearly written materials describing services and treatments are readily available.
- In public areas where paging systems are utilized, electronic message boards are fully functional for important or emergency announcements.
- Appropriate visual alert fire alarms are fully functional.
- Examining rooms are clearly identified with appropriate signage.

Programmatic Initiatives

- The staff in the various areas of the Health Center is provided in-service training *periodically* about deaf and hard of hearing students, use of the TTY/relay service, how to use interpreters, and various communication modes.
- Appropriate resources/referrals/coordination of efforts are used in particular diagnostic/service areas, e.g., audiological/hearing aid services.
- Emergency service staff have knowledge about deaf and hard of hearing students, and are able to differentiate among communication modes in medical emergencies.

Recreational Sports

Communication and language access

- Universally agreed upon and stated visual signals are used in all competitive play.
- Referees trained in these visual signals are available in all competitive play.
- Appropriate communication support is provided in all coaching and instructional situations.

Barrier-free facilities

- Staff members in the various areas of the Recreational Center receive in-service training about characteristics of deaf and hard of hearing students, different communication modes, and the use of telephone relay services.

Programmatic initiatives

- Programs are developed to incorporate disability awareness. For example, an aerobic teacher/physical fitness trainer who can sign recruits deaf students to utilize the weight room or aerobic classes. Teams of students who are deaf or hard of hearing are formed to participate in different sporting events on and off campus.

Judicial and Campus Safety Programs/Services

Communication and language access

- Direct (non-relay) TTY access exists for on-campus emergency phone numbers.
- Qualified sign language interpreting is available for all programming offered by Judicial and Campus Safety programs/services.
- All informational videos on crime prevention are closed captioned and brochures on the subject are readily available.
- Timely and reasonable access exists to appropriate interpreting resources in support of due process and investigatory proceedings involving deaf or hard of hearing students.
- Alternative documentation methods such as video recording of judicial proceedings are made available as requested with no cost to students.
- Written procedures/instructions are readily available for students to follow. For example, if a student is a victim of theft, written instructions on how to file a complaint are available to him/her.
- Student rights are outlined or provided in written format.

- Front line/first responders have basic/ emergency skills for communication with the deaf or hard of hearing student.
- Regulations are clearly defined and appropriate signage is visible in all public areas of the campus.

Barrier-free facilities
- Emergency vehicles are equipped with both visual and audible alert systems.
- Emergency "blue light" phones that require an audible response are able to identify the location of the calling individual.
- Appropriate visual alert fire alarms are located in all facilities that conduct judicial matters.

Programming initiatives
- Alternative training of front line/first responders includes methods of restraint that do not limit communication.
- In-service training is provided to staff members in the various areas of the Judicial/Campus Safety offices about characteristics of deaf and hard of hearing students, use of the relay service, and different communication modes.
- All preventive programs incorporate and address disability concerns/issues. For example, what should a person who is deaf do when walking alone at night that might be different than what a person who hears should do?

Programs/Services for students from diverse ethnic and racial backgrounds and international students

Communication and language access
- A college that admits deaf or hard of hearing students with primary languages *other than* English or ASL makes educational co-curricular campus activities and campus life resources accessible to each of these students in his/her *primary* language.

Programmatic initiatives
- The college acknowledges and affirms the ethnic, racial, and international diversity of members of its campus community through educational programs and campus life resources that reflect this diversity.

  Parenthetically, the self-identities of deaf and hard of hearing students who are also members of ethnic/racial minorities, are a matter of personal choice. It cannot be assumed that their self-identities are defined exclusively or even primarily by their deafness/hard of hearing status. Nor should the converse assumption be made.

- The college ensures that social and/or governance organizations established for community members representing ethnically and racially diverse interests are both *linguistically* and *programmatically* accessible for deaf and hard of hearing individuals.

Programs for commuter students

Communication and language access
- The college ensures that any special social and/ or governance organization established for students who commute (rather than reside on campus) is accessible linguistically and programmatically for deaf and hard of hearing students.

Barrier-free facilities
- The college ensures that the signage directing commuting students and visitors (including those who are deaf or hard of hearing) around the campus is clear and visually accessible.

Accessing off-campus community resources

- Deaf and hard of hearing students become informed about "access resources" such as interpreting services, hearing aid service and sales, and church congregations of deaf people that may be available off campus. Some students may need to be advised as to their "access rights" in initiating commerce with community-based businesses.
- Deaf and hard of hearing commuter students are encouraged to seek out involvement with local community-based deaf and hard of hearing organizations.
- The college involves itself in off-campus activities that enhance the community as a setting for deaf and hard of hearing people to live and work.

POSTSCRIPT PERTAINING TO LAWS AND REGULATIONS[3]

The area of student life is clearly covered by §504 and ADA, but on the whole we have been given less guidance in this regard by the Office for Civil Rights (OCR) because the overwhelming number of complaints filed by students with disabilities involve auxiliary aids and services in the academic context.

Nevertheless, the applicable regulations clearly regard student life/student services, including student housing, as among the "programs and activities" covered by the law. While there have been relatively few cases brought in this arena, OCR has found, for example, that while there need not be a TTY in each and every building, they must be located in such a way as to provide equivalent access to the programs and activities within those facilities.

OCR has also found that an institution's responsibility to provide equal access to programs and services extended to a student wheelchair user who had been denied the opportunity to become a volunteer counselor because the counseling center was inaccessible to her wheelchair. OCR required that the student be given the necessary training in an accessible location and be permitted to meet with peer clients in an appropriate accessible location other than the counseling center. OCR has also found, for example, that an interpreter should have been provided for a voluntary, but educationally related school-sponsored field trip; academic advising and orientation services; and that students should not be expected to bear all or part of the cost.

In one case, a student with a severe physical disability sued for the right to have a roommate instead of the single room the university offered on the assumption that other students would not want to have a severely disabled roommate who used attendant care. The Court found for the student, consistent with existing Supreme Court precedent in which the Court held that a denial of rights based on the anticipated *reactions of others* to the person with a disability violated §504.

Thus, deaf and hard of hearing students must be given equal access to all areas of student life, although not surprisingly, this area has taken a back seat to academic access. But the ADA requires that communications with deaf or hard of hearing persons must be "as effective as communication with others." OCR has repeatedly held that the term "communication" in this context means the transfer of information, including, but not limited to, the verbal presentation of a lecturer, the resources of the Internet, etc. In addition, when determining what type of auxiliary aid or service is necessary, public colleges and universities must give "primary consideration" to the requests of the individual with a disability.

This does not necessarily mean that deaf and hard of hearing students must be provided, for example, a sign language interpreter for each and every student event, but rather that the facts and circumstances be assessed to determine what will yield "effective communication." OCR has consistently applied the following three criteria to assess whether effective communication has been provided: (a) timeliness of delivery, (b) accuracy of the translation, and (c) provision in a manner and medium appropriate to the significance of the message and the abilities of the individual with the disability. Thus, the type of actual service provided may be determined in part by the level of importance of the information to be conveyed, which is arguably less important in the context of certain student activities, than others. While many of these issues have been resolved in the area of academic accommodations, there remains a great deal of "wiggle room" in the area of student services, in which we will undoubtedly see more legal action in the future.

[3] Contributed by Jo Anne Simon, consultant/attorney specializing in laws and regulations pertaining to students with disabilities.

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