



ACCESSIBILITY PLAN

CITY COLLEGES OF CHICAGO

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INTRODUCTION

City Colleges of Chicago (CCC) is making a concerted effort to completely encompass accessibility. In this effort, City Colleges convened an Accessibility Task Force to address inequities in our institutions by crafting an Accessibility Plan with the goal of disability equity. An over-arching yet concise Accessibility Plan will guide CCC in the process of becoming fully accessible. This plan intends to accomplish that goal by identifying existing barriers and potential barriers to full participation in the CCC community and making recommendations for remediation. Students, staff, and community members should expect that CCC be fully accessible, and City Colleges is committed to meeting the needs of anyone entering physical or digital spaces.

WHY AN ACCESSIBILITY PLAN

“INCLUSION ELEVATES ALL.” – ELAINE HALL, FOUNDER OF THE MIRACLE PROJECT

An Accessibility Plan Committee was established in June of 2021 consisting of five subcommittees to address the areas of culture, technology, infrastructure, curriculum, and policy. This committee relied on the expertise of staff with input from students and faculty to evaluate the current state of accessibility at CCC and propose any needed changes. The recommendations of the subcommittees are addressed fully in the following Accessibility Plan.

The Accessibility Plan will give each of our seven colleges and five satellite centers a central, shared reference point as they work to enhance accessibility. This Accessibility Plan will guide the changes needed to meet the diverse needs of our student body and the city of Chicago. CCC is in a unique position as it is composed of seven individually-accredited colleges. Each operates under the flagship of the CCC District Office, and accessibility should be standardized across all colleges to guarantee that all people with disabilities can interact with our spaces and services equitably.

It is the initial goal of this plan to make recommendations for improved accessibility and to also establish standards, benchmarks, and expectations for accessibility as equity. Each college has its own identity, and accessibility should be consistently prioritized as part of the culture across the City Colleges of Chicago for the benefit of students, faculty and staff. Because students can enroll across colleges, CCC has a vested interest in making sure their experiences are welcoming and accessible no matter the location. This plan will also develop efforts with Human Resources to make sure that all faculty and staff have their accessibility needs met. Staff will also be able to refer to this plan as a North Star when considering any accessibility improvements.

STUDENT EXPERIENCE

It is imperative that a system-wide Accessibility Plan make each student's experience smooth and first-class. A student with a disability should not have to endure unwarranted hardship while receiving their education—we want their attention to be focused on learning and building skills.

This Accessibility Plan centers on the experiences of students with disabilities, considers the experiences of faculty and staff with disabilities, and has the power to benefit all members of our CCC community by guiding us toward more equitable and accessible colleges and resources. The numerous recommendations developed by the Accessibility Planning Subcommittees are intended to positively

affect the experience of all students at City Colleges of Chicago. All of the recommendations have been crafted through the lens of equity. The goal is for all students to engage with City Colleges of Chicago in an equal manner, regardless of their disability or need for accommodations.

“My overall experience has been positive. The quality of instruction has been good. There have been some small issues with how to treat someone with a disability. For instance, being overly accommodating or other ableist behavior. Some cultural training could be helpful.”

– **Anonymous Student**

An equitable student experience at City Colleges of Chicago is about more than just making sure the ramp to the building is built to code or the sign language interpreter has been assigned as necessary. Students with disabilities need accessibility to be integrated seamlessly into the learning experience without ableist undertones. They need to feel that CCC values them as an equal member of the student body and will not only help them learn, but challenge them to do so.

STUDENT VOICE

In order to learn more about the student experience and areas where equity is lacking, a series of student focus groups was set up along with an anonymous survey. All students receiving accommodations at City Colleges of Chicago were invited to join one of four different focus groups. These focus groups were completely confidential and operated as a safe space where everyone’s opinion was valued and respected. An anonymous survey was sent electronically to all students receiving accommodations to capture insights from students who were unable to attend any of the focus groups.

The student focus groups generated a lot of qualitative information. The student participants were thoughtful and constructive with their comments. In these focus groups, students shared a variety of feedback, expressing frustrations, brainstorming solutions, and questioning the system to consider how it could be revamped to better promote accessibility.

The anonymous survey generated more quantitative data, as would be expected. In general, the data reflected the quote at the beginning of this section. The survey was designed to get hard “yes” or “no” data but also gave the students completing the survey a chance to elaborate on their answers. There is no such thing as partially accessible, so even one answer indicating “no” caused an examination to determine appropriate recommendations to be made.

As an example, a question in the anonymous survey asked, “Do your instructors collaborate with you to ensure your accommodations are being implemented correctly?” Only 65% of respondents indicated “yes.” While instructors cannot assess a functional limitation, faculty are encouraged to collaborate with students to implement accommodations in consultation with the ACCESS Center. Accessible education requires an investment and participation from all stakeholders.

The answers to this question illustrate that there is a need to improve the process of following up on the implementation of accommodations and for a subsequent cultural shift to empower collaboration between stakeholders. This is just one example where student feedback may look generally supportive of the status quo, but if only a few say the system is not working for them, then something must be done to correct this.

ENSURE ACCESSIBILITY IS PART OF EACH COLLEGE'S STRATEGIC, EQUITY, AND STRATEGIC ENROLLMENT MANAGEMENT PLANS

Each of the seven colleges has crafted their own Strategic Plan, Equity Plan, and Strategic Enrollment Management Plan. These plans comprise a comprehensive framework for City Colleges to advance their abilities to meet the educational needs of our students. This Accessibility Plan is intended to complement and support these existing plans. By integrating accessibility into strategic planning, CCC will improve the experience for its entire student body and impact overall enrollment and retention goals.

PARTNERSHIP WITH MAYOR'S OFFICE FOR PEOPLE WITH DISABILITIES

Over the past four years, City Colleges of Chicago has worked in tandem with the Mayor's Office for People with Disabilities (MOPD) on exploring equitable opportunities for our students. In 2019, the Mayor's Office released the *Employment and Economic Opportunity for People with Disabilities Plan*. In this plan it states "The City of Chicago has a longstanding commitment and demonstrated track record on disability rights and advancing accessibility and inclusion. Specific to the issue of employment, the City has tackled the dire need for employment and economic opportunity through both policy reform and service delivery." Furthermore, this plan highlighted the commitment to increase and enhance employment support and preparation for our students at CCC:

PRIORITY 3: Facilitate Greater Participation of Students in Higher Education for Careers

- Provide comprehensive training to City Colleges of Chicago Career Services staff on career preparation and employment counseling for students with disabilities
- Collaborate with Chicago Community Colleges and employers to identify internships specifically for students with disabilities
- Identify partners to conduct research on the employment outcomes for secondary and post-secondary graduates with disabilities in Chicago
- Create a task force on transition services to improve outcomes for Chicago Public School students

Since 2019, this work has moved beyond a stated plan to actionable and intentional partnership with MOPD. This includes, in 2019, a pilot internship for students with disabilities as a part of One Summer Chicago; in 2021, the opportunity to provide our students with disability access to COVID-19 vaccines prior to the release to the full population of Chicago; and the building of connections with other disability service agencies in the Chicagoland area.

In June 2021, an Access Officer has been designated in every City of Chicago Department and Sister Agency. CCC identified a lead in ensuring our institution's programs, services and activities are accessible to the public. In this role, the access officer serves as our institution's point of contact for an ADA Title II Self-Evaluation and Transition Plan, as well as creates a single point of contact who receives and also proactively provides access.

ELEVATE CITY COLLEGES OF CHICAGO AS A BENCHMARK

“There is no greater disability in society, than the inability to see a person as more.”

– **Robert M. Hensel, Disability Activist and World Record Holder**

CCC has an opportunity to set the standard of accessible college institutions. Now is the time to establish policies and practices that exceed the minimum requirements of the Americans with Disabilities Act and can be presented as an example for other colleges across the country to follow. Accessibility without equity creates a culture focused solely on compliance but shifting the focus to accessibility as equity will positively impact the experiences of people with disabilities at CCC.

This Accessibility Plan will be the guide for CCC to implement the changes needed to meet the diverse needs of our student body and the City of Chicago. CCC is in a unique position as it is composed of seven individually accredited colleges. Each operates under the flagship of the CCC District Office, and accessibility should be standardized across all college to guarantee that all people with disabilities can interact with our spaces and services equitably. It is the initial goal of this plan to make recommendations for improved accessibility, but the primary goal is to establish standards, benchmarks, and expectations for accessibility as equity.

SCOPE OF ACCESSIBILITY PLAN SUBCOMMITTEES

The various subcommittees of the Accessibility Plan Committee have identified numerous areas that need to be improved to promote accessibility and equity across City Colleges. The Committee and Subcommittees are made up of District Office leadership, faculty, staff, and students. Some subcommittees have put forward extensive lists, while others have emphasized the need for a few well-thought-out recommendations. All the recommendations are addressed in this Accessibility Plan, but as part of this introduction, a few of the highlights are listed here.

Subcommittees' Scope of Work:

- Culture
 - Identify and integrate the culture and experience of individuals with disabilities at CCC
 - Identify gaps in cultural competence around accessibility
 - Identify the training needs for faculty/staff
- Curriculum
 - Review current existing policies, processes, expertise, and guidance around curriculum design, and review our approaches to embedding accessibility into curriculum design processes
 - Identify areas where disability can be infused into existing curriculum and opportunities for new curricular offerings
- Infrastructure (physical infrastructure)
 - Assess the physical access for all CCC facilities and publish a transition plan as required by Title II of the Americans with Disabilities Act

- Policy
 - Determine a need for an accessibility policy
 - Audit existing policies for any unknown accessibility concerns
- Staffing and Resources
 - Review the organizational structure and make recommendations for a structure that promotes accessibility
 - Examine current staffing and make recommendations to address staffing needs
 - Identify resources needed to promote accessibility
- Technology
 - Review technology systems and tools to determine accessibility for diverse learners
 - Identify technology resource gaps, which impede learning
 - Consider purchasing practices of new technology and accessibility checks

STAKEHOLDERS

It is important to identify and acknowledge different stakeholders with a vested interest in accessibility at the City Colleges of Chicago. Identified stakeholders are identified and defined below.

ADMINISTRATION

Positions of leadership carry the flag of accessibility for City Colleges of Chicago. Clear policies and messaging just come from the top down, asserting that accessibility and inclusion of people with disabilities are an integral part of CCC. The example set by leadership will carry over to all staff, students, faculty, and the community at large, making CCC a beacon for people with disabilities who seek the education opportunities our colleges have to offer.

STUDENTS

The student experience is the impetus of this plan. While the scope of the plan has become larger to encompass staff and faculty, students will benefit the most from this Accessibility Plan. Regardless of their enrollment category (credit, adult education, dual enrollment, etc.), this plan will provide a path for all students with disabilities to feel comfortable and to fully participate in the educational experiences City Colleges has to offer. For more information, see the section titled “Student Experience.”

STAFF

All staff will benefit from the guidance of a single Accessibility Plan. It will unify, across the seven colleges, the way accessibility is afforded to all students. College staff can use this document as an accessibility resource. It is not the goal of this plan to add excessive workloads to any staff position. However, the goal of this plan is to recommend alternative ways of conducting business with accessibility at the forefront.

In addition to working with students who have disabilities, this plan will involve Human Resources and will examine the process for employees with disabilities to receive accommodation. It is imperative that employees receive the same opportunities for accommodations as students and that the process of receiving accommodations is clearly communicated.

FACULTY

Department chairs, professors, and instructors at all levels will be able to refer to this plan (and the policies and guidelines that result from it) in order to know how to best meet the needs of their students with disabilities. Consulting with other staff, like ACCESS Center Directors, is an option, but the goal of this plan is to empower faculty to utilize other resources that will guide them in creating accessible curricula. City Colleges wants faculty to embrace the idea of welcoming all students to their class regardless of their learning style. To do this, faculty must feel comfortable in adapting existing curriculum and be mindful when developing new lessons of the possible needs of all students. Faculty are the backbone of education at City Colleges, and this plan will give them the support and recommend resources needed to foster an inclusive classroom environment.

In addition to working with students who have disabilities, this plan will involve Human Resources and examine the process for faculty with disabilities to receive accommodation. It is imperative that faculty receive the same opportunities for accommodations as students and that the process to receive accommodations is clearly communicated.

COMMUNITY

City Colleges of Chicago serves the entire city. Our city is composed of numerous diverse communities, which are comprised of people with diverse needs. Disability intersects with all groups seeking support and access. For that reason, CCC needs a vast array of resources to meet the accessibility needs of all communities.

In addition to serving the entire city, each of the City Colleges has an obligation to be an active part of the community it is located in. Understanding the culture of the people in the surrounding area is vital to each college providing the opportunities each community needs and will benefit from. Furthermore, understanding how disability is viewed by people in the surrounding area will be key to enticing potential local students with disabilities to take advantage of the education and programs offered at CCC.

BASIC DESCRIPTION OF THE ACCESSIBILITY PLAN

The main objective of this Accessibility Plan is to ensure that all people with disabilities have the best experience possible at City Colleges of Chicago. Using the recommendations of the Accessibility Plan Subcommittees as a guide, this plan will apply those recommendations to the following sectors:

- Operations
- Personnel
- Policy
- Educational Quality
- Facilities
- Training

Input from a vast array of those who make up the City Colleges community was taken into consideration when crafting this plan. By surveying a broad swath of experiences, the recommendations that result from this plan reflect CCC in its entirety.

ACCESSIBILITY PLAN

The following sections contain the recommendations as determined by the scope and work of the various subcommittees with appropriate rationale and input from stakeholders.

OPERATIONS

This section of the plan includes recommendations that require changes and improvements to CCC’s day-to-day operations, finances, procurement, and business practices.

CLOSED CAPTIONING BUDGET

Recommended by Subcommittee(s)	Staffing and Resources Co-sponsored by Curriculum and Technology
<p>Background and Description of Recommendation</p>	<p>Closed captioning is an accommodation provided to students through the ACCESS Centers, requiring all educational media to be accessible to deaf/hard of hearing/hearing impaired students. Moreover, City Colleges has an institutional responsibility that all public-facing media be accessible via closed captions.</p> <p>This committee recommends that City Colleges identify funds and establish a process as a resource for the institution to promote, enhance, and sustain a high level of captioning accessibility. This committee also recommends that City Colleges draft a transitional plan to evaluate media currently in use to be made accessible if no accessible alternatives are available.</p>

SOFTWARE PROCUREMENT ACCESSIBILITY VETTING

Recommended by Subcommittee(s)	Technology
<p>Background and Description of Recommendation</p>	<p>There is no vetting process across CCC to ensure that the software at each college is accessible. This committee recommends a vetting process before the purchase of software to review all VPAT reports and ensure that all new software is accessible and within WCAG standards.</p> <p>Harold Washington College has created a tool to review software to ensure accessibility (Note: the same standards apply to webpages,</p>

	<p>but a different tool will need to be developed). This is a thorough tool that will ensure all current accessibility standards are met.</p> <p>This committee also recommends that staff from Harold Washington College be engaged in training representatives from each college in the use of the accessibility review tool created at HWC.</p> <p>Additionally, this committee recommends identifying staff at each college to be responsible for reviewing all software to ensure accessibility.</p> <p>As a result of this training, each college and District Office should institute a formal vetting process to ensure accessibility will be a part of the procurement process and be applied to the purchase of all software.</p>
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ACCESSIBILITY GUIDELINES, CURRICULUM DEVELOPMENT

Recommended by Subcommittee(s)	Curriculum
Background and Description of Recommendation	<p>City Colleges of Chicago does not have any guidelines to ensure accessibility in the development of curricula. Developing a rubric for accessibility would provide guidelines and resources for faculty creating accessible curriculum at the onset.</p> <p>It is important that information be available to students in a variety of modalities. Visual, audio and motor skills/abilities need to be considered when preparing curricula and how a student will interact with the coursework. The lessons/materials put forward should also be adjustable so each student can manipulate the materials to best access the information and activities.</p> <p>It is recommended that a small team (2-4 people) of faculty stakeholders and ACCESS Center staff be assembled to research best practices in accessible guidelines at other educational institutions. This team should also be qualified to draft the Accessibility Guidelines for CCC.</p>

DISABILITY AWARENESS MARKETING AND EVENTS CALENDAR

Recommended by Subcommittee(s)	Culture
<p>Background and Description of Recommendation</p>	<p>It is important to highlight and acknowledge the months and days of the year that are important to the disability community. The observance of these events will let the students, faculty, staff, and stakeholders know that we honor and respect the people of the disability community. Representation is important and it matters.</p> <p>This committee recommends that CCC creates marketing for key disability-related observances based on a calendar that has been created by the subcommittee. The marketing should highlight the events and any images should reflect the diversity of the CCC community. The marketing should be displayed on the CCC website, social media outlets, college LED monitors, and any other viable CCC managed sites (Zoom backgrounds, poster boards, bulletin boards, etc.).</p> <p>Also, this committee recommends that any marketing that includes images of people should reflect the diversity of the disability community as well. Images of people with visible and invisible conditions as well as racial and ethnic diversity should be included in all visual marketing.</p>

ACCOMMODATION REQUESTS FOR EXTERNAL AND INTERNAL EVENTS

Recommended by Subcommittee(s)	Culture Co-sponsored by Policy
<p>Background and Description of Recommendation</p>	<p>As CCC strives to be a more accessible and inclusive community, efforts should be made to ensure that all events are accessible to people with disabilities, which includes entrances, elevators, parking, restrooms, and seating. Title II and Title III of the Americans with Disabilities Act addresses discrimination based on disability for federally-funded programs and access to public accommodations.</p> <p>The ADA Subcommittee at Harold Washington College has already made extensive progress on the development of policy around accessibility for events which will be used for the basis of this recommendation.</p> <p>The purpose of this policy is to ensure that all CCC events are accessible and to start an event accessibility assessment early in the event planning stages. When planning or requesting events, completing an assessment will be needed, and so will making necessary requests for accessibility services.</p>

	<p>This committee recommends the planner of any college-sponsored event will complete and submit PEA Checklist (Public Events Accessibility checklist) to identify specific needs as well as set up universal design in event planning.</p> <p>All internal event marketing or external event requests should include the following accessibility statement: <i>Accessible accommodations available upon request. Participants requiring accommodations for accessibility to this event should contact (email of event organizer) five business days in advance of the event. You can also email your requests to [the appropriate email address].</i></p> <p>All internal event marketing or external event requests should include a QR code that will allow participants needing specific accommodations for the event to scan the code that takes them to the accommodation request form for the event.</p>
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MOBILITY SPECIALIST

<p>Background and Description of Recommendation</p>	<p>Blind/low vision students benefit from the services of a Mobility Specialist to orient them to the layout of a new space. Currently, ACCESS Center staff are able to provide blind/low vision students with college tours to show them the essentials of that college; however, only a certified Mobility Specialist is qualified to do a building orientation.</p> <p>This committee recommends that CCC identify a certified Mobility Specialist to be available the week before the semester, the first week of the semester, and as needed thereafter. This committee recommends three options to implement this recommendation:</p> <ul style="list-style-type: none"> ● A special assignment for ACCESS Center support staff to complete the required 40-hour training and to provide services every semester ● The formation of external partnerships with organizations such as Access Living, Chicago Lighthouse for the Blind, Blind Services, and MOPD to explore options for securing a Mobility Specialist ● The identification of a vendor to contract out to for Mobility Specialist services

ACCOMMODATIONS MANAGEMENT SOFTWARE

Recommended by Subcommittee(s)	Staffing and Resources Co-sponsored by Technology
<p>Background and Description of Recommendation</p>	<p>Data-driven/informed decision making is a cornerstone for effective operations, but CCC is currently lacking due to ineffective data management of accommodation services provided through the ACCESS Centers.</p> <p>The ACCESS Centers are able to track students in CS9 for intakes, document submission, approved accommodations, and letters of accommodation. However, the current method to schedule and track accommodation services provided every semester depends largely on manual calculations done by hand. Moreover, the service hour data input is aggregated for the entire District, which is a roadblock to colleges making data-driven decisions locally for their students with disabilities.</p> <p>In addition to centralizing intakes, document submission, approved accommodations, and letters of accommodations, such software would provide students more autonomy in the accommodations process by creating a centralized location to manage their interactions with the ACCESS Center and its services such as note taking, sign language interpreting, and accessible testing no matter the college.</p> <p>Having access to actionable data will empower college and district leadership to make decisions regarding services, staffing, equipment, physical space, etc. This committee identified this need through discussions with ACCESS Center stakeholders and meetings with college leadership.</p> <p>This committee recommends that CCC explore options and procure an accommodations management software to enhance data and further streamline the ACCESS Center experience for students.</p>

EMBOSSER PURCHASE

Recommended by Subcommittee(s)	Staffing and Resources
<p>Background and Description of Recommendation</p>	<p>CCC currently has an embosser at Harold Washington College to provide Braille text conversion services for students. CCC purchased its first embosser in 2005 and the current embosser in 2014.</p> <p>This committee recommends that CCC begin budgeting and planning to purchase a new embosser by Fiscal Year 2024 to maintain the high-quality services provided to students needing Braille. The embosser should be able to emboss Braille and text side-by-side.</p>

JOB DESCRIPTION LANGUAGE

Recommended by Subcommittee(s)	Culture
<p>Background and Description of Recommendation</p>	<p>Ableist language permeates society as passive discrimination against people with disabilities. Job descriptions frequently use ableist language that unintentionally rules out people with disabilities. This language can most commonly be found under skills and/or qualifications, e.g. “excellent verbal and written communication” rules out Deaf or hard of hearing applicants who primarily use American Sign Language, or “must be able to lift 10 pounds” rules out qualified candidates who can otherwise do the job but cannot lift the specified amount of weight.</p> <p>This committee recommends that prior to posting vacant positions, Human Resources and the hiring manager review and revise job description language to create more inclusive hiring practices. This committee also recommends that job descriptions for new positions created after the publishing of this plan are reviewed and revised.</p>

ACCESSIBILITY AND SAFETY REPORTING/ANNOUNCEMENT SYSTEM

Recommended by Subcommittee(s)	Technology
<p>Background and Description of Recommendation</p>	<p>Unintentional barriers to accessibility occur by way of blocked pathways, out of service elevators, out of service automatic doors, etc. As of now, CCC does not have a way for students and employees to report these instances as they become aware.</p> <p>This committee recommends the creation of an application for students and employees to report physical accessibility issues.</p> <p>Furthermore, this committee recommends an announcement system for students and employees to get real-time information about facilities. Having access to facility information before accessing a space will empower people with disabilities to make decisions prior to arriving. The system should also include some time of ticketing apparatus, so the person who filed the report can track the response.</p>

PERSONNEL

This section of the plan includes recommendations for staffing to build an organizational infrastructure to promote and sustain accessible services and practices.

ADA COMPLIANCE OFFICE/ADA COORDINATOR

Recommended by Subcommittee(s)	Staffing and Resources
<p>Background and Description of Recommendation</p>	<p>The ADA Compliance Officer role is standard and best practice across higher education institutions but by different names, but this position functions as an ADA/504 Compliance Officer for the entire institution. This person is responsible for institutional accessibility outside of the classroom. They work cross departmentally to promote and advocate for accessibility in marketing, purchasing, policies, and procedures. Part of their role is assessing and evaluating the process of centers for accessibility as checks and balances ensuring compliance. This position usually exists high up on the organizational chart in the offices of Human Resources, Legal, Presidents, Vice Presidents, Provosts, or Chancellors because this person needs appropriate authority to establish processes and act on issues of compliance as requirements instead of recommendations.</p> <p>At the City Colleges of Chicago, the ACCESS Center Directors (known at the time as DAC Directors) went through the JAQ process. During that process, the duties of ADA/504 compliance officer were added to their job duties. Based on best practices, CCC is lacking a system of checks and balances for processes within the ACCESS Centers, and the Directors of the ACCESS Centers should not be the ADA/504 Compliance Officer for the college (Friend, Judy, & Reilly, 2005, p. 152). In addition, the conflation of the two roles splits the Directors between serving students and monitoring institutional accessibility when their main focus should be student accommodation services (Friend, Judy, & Reilly, 2005, p. 1). This person would establish and oversee taskforces relating to ADA and accessibility compliance (Friend, Judy, & Reilly, 2005, p. 11).</p> <p>This committee recommends that District Office be staffed with an ADA Compliance Officer/Coordinator to monitor and spearhead institutional accessibility initiatives in partnership with Student Accessibility Services, ACCESS Centers, and other stakeholders. This position will have oversight over the institutional accessibility of District Office’s policies, procedures, hiring practices, marketing, ADA grievance procedure, etc. in partnership with the District Director of Student Accessibility Services. This recommendation would allow student-facing accessibility professionals to have increased bandwidth to serve students both in and out of the classroom.</p>

	Source: Friend, J. G., Judy, B., & Reilly, V. (2005). <i>The ADA coordinator's Guide to Campus Compliance</i> . LRP Publications.
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DEAF/HARD OF HEARING SPECIALIST

Recommended by Subcommittee(s)	Staffing and Resources
Background and Description of Recommendation	<p>In any given semester, the City Colleges of Chicago is home to approximately 15-25 Deaf or Hard of Hearing students who use American Sign Language (ASL) as their primary mode of communication. From the college ACCESS Centers and the Interpreter Services Department, students have access to a variety of accommodations such as sign language interpreters, notetakers, extended time, etc. Even though these accommodations are implemented shortly after a request is made, the presence of a sign language interpreter may not be sufficient to achieve the same access to instruction that hearing students have (Palmer, Cawthon, Garberoglio, & Ivanko, 2019). Higher education institutions across the country have an attitude of the bare minimum to maintain compliance without getting creative when imagining what equitable access could look like for Deaf or Hard of Hearing ASL using students (Palmer, Cawthon, Garberoglio, & Ivanko, 2019).</p> <p>This committee recommends for the creation and hiring of a full-time Deaf/Hard of Hearing Specialist, who can provide direct instruction and academic supports to students in Developmental Education and Adult Education courses. This position would align with CCC’s Developmental Education Continuous Improvement plan recommendations 12 <i>“Adopt a multi-faceted continuous improvement agenda for tutoring supports that will establish a standard for robust and effective and resources in support of developmental education across the District”</i> and 13 <i>“Create two district wide reading clinician positions and one reading consultant positions for each college without a Reading Center, as well as six remote reading consultant positions available to serve all CCC students remotely.”</i> While CCC has hired the Reading Clinicians, they are still not able to serve the Deaf/Hard of Hearing student population as effectively as someone with knowledge in both English and ASL could.</p> <p>The recommended Deaf/Hard of Hearing Specialist position would attempt to augment and supplement interpreted classroom instruction by providing as-needed direct instruction primarily in Adult Education and Developmental Education courses. Having direct access to ASL instruction increases active involvement in learning, which yields higher learning outcomes (Palmer, Cawthon, Garberoglio, & Ivanko, 2019). The creation of this position would also create an opportunity to have a Deaf role model at each college for the Deaf and Hard of Hearing students (Palmer, Cawthon, Garberoglio, & Ivanko, 2019). This position would be an</p>

	<p>asset to our students, faculty, staff, and interpreters by being a bridge between all stakeholders to create a model of coordinated care for student success in Developmental English and Math courses as well as Adult Education ESL and GED.</p> <p>Source: Palmer, J. L., Cawthon, S. W., Garberoglio, C. L., & Ivanko, T. (2019). ACCESS is more than accommodations: 2018–2019 deaf college student national accessibility report. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin.</p>
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MANAGER OF ASSISTIVE TECHNOLOGY

Recommended by Subcommittee(s)	Staffing and Resources Co-sponsored by Technology
<p>Background and Description of Recommendation</p>	<p>Assistive technology is a quickly growing and ever-changing landscape that requires both accessibility and technological acumen. There have been significant advances in the types and use of assistive technologies, which has created scattered and pocketed management of software and equipment. The Manager of Assistive Technology would be responsible for maintaining current knowledge, new developments, and best practices of assistive technology District-wide. They would also manage the use of assistive technology, adaptive equipment, and software licensing. They would also work in partnership with OIT to troubleshoot issues and integrate new software when needed.</p> <p>The ACCESS Center Directors are subject matter experts in student accommodations and know which equipment and software are appropriate for student needs, but they lack the time and bandwidth to adequately train each student on using their equipment and software. They are able to provide an overview, but they are not technological experts. When assistive technology malfunctions or otherwise requires more technical knowledge, the ACCESS Center Directors do not have the appropriate expertise to assist, and OIT does not currently have any identified experts for this niche area of expertise. Harold Washington College has a full-time Coordinator who oversees assistive technology and testing, and they have seen improvement in students’ use of assistive technology and satisfaction due to a dedicated contact person and more focused training. This is a model that can and should be scaled up to the District level.</p> <p>This committee recommends the creation of a new position Manager of Assistive Technology reporting to the District Director of Student Accessibility Services to aid the ACCESS Center Directors and students with assistive technology accommodations by managing the purchasing and use of assistive technology, adaptive equipment, software licensing, training, accessibility checks for new software purchases, etc. This position will also coordinate with Chicago Public Schools to better align our accessible technology</p>

	with what students are already using to decrease the learning curve and increase efficacy in use in line with the Chicago Roadmap Domain 3.3.
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MANAGER OF INTERPRETER SERVICES

Recommended by Subcommittee(s)	Staffing and Resources
Background and Description of Recommendation	<p>Interpreter Services is a team of 4 full-time and 8 part-time interpreters and a third-party vendor providing approximately 4,000 to 6,000 hours of direct service every semester to between 15 to 25 Deaf and Hard of Hearing students.</p> <p>A full-time Manager of Interpreter Services will have oversight over the staff interpreters, vendor relationships, student programming, and the extensive schedule of services. The manager will maximize efficiency by making sure the operational process guarantees expedient provision of qualified interpreter services as required under Title II of the Americans with Disabilities Act.</p> <p>This committee recommends revisions to the Manager of Specialized Student Services to convert the position to the Manager of Interpreter Services. This committee also recommends hiring for the position that was left vacant after the previous Manager filled the vacant Director role.</p>

INCREASED SIGN LANGUAGE INTERPRETER STAFFING

Recommended by Subcommittee(s)	Staffing and Resources
Background and Description of Recommendation	<p>In any given semester, the City Colleges of Chicago is home to approximately 15-25 Deaf or Hard of Hearing students who use American Sign Language (ASL) as their primary mode of communication. From the colleges' ACCESS Centers and the Interpreter Services Department, students have access to a variety of accommodations such as sign language interpreters, notetakers, extended time, etc.</p> <p>CCC current has a staff team of four full-time interpreters and eight part-time interpreters. CCC also retains a contact with a third-party vendor to outsource any needs that staff are not able to fulfill. Based on Spring 2022 requests, CCC staff are fulfilling approximately 79% of all requests, and the vendor is fulfilling 21% of all requests. When surveyed on a scale of 1 - 5, students have rated their services from staff as an average of 4.5 and the vendor an average of 3.3 since Fall 2019. Students receive more flexibility and better services from staff than they do from the vendor.</p>

DISABILITY SERVICES COORDINATOR

Recommended by Subcommittee(s)	Staffing and Resources
<p>Background and Description of Recommendation</p>	<p>Disability Services Coordinator is an already established role at CCC to assist the ACCESS Center Directors in day-to-day operations; however, not every ACCESS Center has a Coordinator. The lack of appropriate staff across all colleges creates potential legal and compliance concerns in the event that an ACCESS Center Director resigns, takes a leave of absence, or is otherwise unable to perform their job duties. Additionally, having increased staff support at each college would decrease wait times for students to be served and create more efficiency in day-to-day operations.</p> <p>First, this committee recommends that each college be staffed with a full-time Disability Services Coordinator no matter the size of the ACCESS Center’s caseload.</p> <p>Second, this committee recommends performing a JAQ of the Disability Services Coordinator position by examining similar roles at other institutions for job duties and title, identifying job duties not explicitly stated in the current job description, and performing a market analysis of salary for similar positions in the Chicagoland area.</p> <p>Third, this committee recommends the creation of a metric to make a justification for additional staffing based on services hours (notetaking, testing services, text conversion, etc.) over multiple semesters. This committee believes having such a metric would ensure that staffing at each ACCESS Center would scale appropriately based on service needs.</p>

ALT TEXT AND TEXT CONVERSION SERVICES

Recommended by Subcommittee(s)	Staffing and Resources
<p>Background and Description of Recommendation</p>	<p>Alt text and text conversion are services offered to students who use assistive technology and/or Braille to interact with different types of media. The team at Harold Washington is a shared resource to support of the ACCESS Centers at all seven colleges, however the team does not currently have the staffing bandwidth to handle increased request volume to support faculty in implementing Universal Design for Learning initiatives. Also, as students begin returning to in-person learning in larger numbers, the team infrastructure needs to support a higher volume of requests.</p> <p>The services offered are:</p> <ul style="list-style-type: none"> ● Alt text for printed materials that include pictures, graphs, and other visual representations of information

	<ul style="list-style-type: none"> ● Braille conversion for Braille I, Braille II, Music Braille, Nemeth Braille code for math, Computer Braille, etc. ● Audio book services ● Descript videos ● Tactile graphs <p>As an example, if a professor teaching a course has a media-heavy class and needs descript videos, the staff labor hours required could range from 100 to 500 hours.</p> <p>First, this committee recommends a JAQ of the Assistive Technology Specialist position for both scope of duties and compensation to better align with work performed and industry standards.</p> <p>Second, this committee recommends an additional full-time position to support the existing work, prepare for increased volume, and support training of new Alt Text/Text Conversion team members.</p>
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POLICY

This section of the plan includes recommendations for necessary policy changes that affect accessibility and inclusion.

ACCESSIBILITY POLICY

Recommended by Subcommittee(s)	Policy
Background and Description of Recommendation	<p>Many college institutions in the U.S. have adopted an Accessibility Policy. This formal, legal document works along with the ADA to provide the support the ADA Compliance Officer to make final determinations regarding request, complaints and grievances.</p> <p>CCC currently does not have an Accessibility Policy. It is recommended that a team be assembled to draft such a policy and present it to the Board for approval. This team should include, but is not limited to, policy experts, student accessibility services staff, and possibly an outside consultant.</p> <p>Resources can be found with the information researched by the Policy Subcommittee of the Accessibility Planning Committee.</p> <p>Staff should not require extra compensation for this work, as it should be prescribed in their regular workload.</p>

ACCESSIBILITY STATEMENT, SYLLABI

Recommended by Subcommittee(s)	Policy Co-sponsored by Culture, Curriculum
<p>Background and Description of Recommendation</p>	<p>Syllabi are a comprehensive agreement between faculty and students, and CCC’s commitment to accessibility should be highlighted in all syllabi. Having an accessibility statement on all syllabi would further encourage students to engage with their faculty about accommodations and accessibility concerns proactively. Having a statement included in the syllabi creates a baseline for a culture of inclusion and a value of accessibility in the classroom.</p> <p>This committee recommends the inclusion of the accessibility statement, drafted by Student Accessibility Services, be included on all master syllabi.</p> <p>The Proposed Statement:</p> <p><i>The City Colleges of Chicago are committed to creating learning environments that meet the needs of our diverse student body. If you anticipate any issues related to the format, materials, or requirements of this course, please meet with your instructor outside of class time to discuss potential options.</i></p> <p><i>If you have a disability, or think you may have a disability, you may also want to meet with the ACCESS Center at your home college to begin this conversation or request an official accommodation. You can reach out to the ACCESS Center at any point in the semester, but you are encouraged to reach out early. Information provided to the ACCESS Center relating to your disability and medical records will be kept private from everyone including your instructors. If you have already been approved for accommodations through the ACCESS Center, please provide your Letter of Accommodations to your instructors directly and meet with each instructor individually to develop an implementation plan. You can find more information about the ACCESS Center, including contact information, here: ACCESS Centers</i></p>

WEBSITE ACCESSIBILITY

Recommended by Subcommittee(s)	Policy Co-sponsored by Culture, Curriculum
<p>Background and Description of Recommendation</p>	<p>The website is oftentimes the first impression potential students and other community members have of CCC, and the current website is largely inaccessible according to WCAG 3.0 standards.</p> <p>First and foremost, this committee recommends that accessibility and WCAG 2.0 be considered in the website redesign as part of the 3S initiative. The new website should be evaluated for accessibility prior to launch. After launch, this committee recommends that a ticketing system for website edits be developed and implemented to ensure continued and sustained WCAG 3.0 compliance.</p> <p>Second, this committee recommends a statement for web accessibility be featured prominently on the website. This statement should include but is not limited to CCC’s commitment to web accessibility, information about WCAG 3.0 standards, and a contact person/office for when users experience barriers to access.</p>

NOTICE TO THE PUBLIC

Recommended by Subcommittee(s)	Policy
<p>Background and Description of Recommendation</p>	<p>A Notice to the Public is required by federal, state and local government entities under the ADA. The notice should communicate to the public and anyone who interacts or is seeking to interact with the institution about Title II of the ADA.</p> <p>This committee recommends that CCC drafts and posts a Notice to the Public on the website prominently. This statement should include but not limited to information about Title II, information about employment, effective communication, reasonable accommodations, not charging for auxiliary aids or services, how to file complaints, and a point of contact for visitors wishing to arrange accommodations. This point of contact should be the ADA Compliance Officer.</p>

GRIEVANCE PROCEDURE

Recommended by Subcommittee(s)	Policy
<p>Background and Description of Recommendation</p>	<p>The Americans with Disabilities Act requires public entities to create and publish a grievance procedure for ADA-related discrimination complaints. As of now, CCC does not have a standard, outlined grievance procedure between all colleges and District Office. This procedure must be unbiased and should not be overseen by the ACCESS Center Director in the event a person’s grievance is against the ACCESS Center.</p> <p>This committee recommends the creation and publishing of a grievance procedure to be overseen by the ADA Compliance Officer (see pg. 17). This procedure should be published with the Notice to the Public (see pg. 31).</p> <p>For more information on grievance procedures, see: ADA Tool Kit</p>

EDUCATIONAL QUALITY

This section of the plan includes recommendations that impact educational quality. These recommendations reflect changes to curriculum and course development practices to promote accessibility.

DISABILITY STUDIES

Recommended by Subcommittee(s)	Curriculum Subcommittee
<p>Background and Description of Recommendation</p>	<p>The history of disability culture and disability justice are not widely taught at CCC. This recommendation remedies this by developing a stand-alone course(s) on the history of disability in the United States. The course(s) will also include a thorough investigation of the ADA, Olmsted Act and other legal milestones in the disability rights and justice movements.</p> <p>In addition to history, it is recommended that CCC offer more functional/studio type courses, e.g. American Sign Language, the basics of Universal Design, Engineering and Designing Prosthetics.</p> <p>Literature is a prime area for disability studies and analysis. Both in things written by disabled authors, and the review of disabilities, ableism, etc. in existing literature.</p> <p>Here is an example of literature curricula and sample resources that addressed disability. One of the most prevalent depictions of disability in pop culture is Frankenstein’s monster because of his physical and implied cognitive disability. One can compare and</p>

	<p>contrast passages from the original text by Shelley with modern depictions in film. It can be argued that the original story focused on “othering” and psychological trauma. While modern adaptations and films tend to focus on the disfigurement and behaviors as being “horrific” Below is a link to a scholarly article. Another possibility is to look at folk lore and how disabilities are portrayed. An excellent source is Amanda Leduc’s analysis of Fairy tale characters.</p> <p>Leduc, Amanda. <i>Disfigured: On Fairy Tales, Disability, and Making Space</i>. Coach House Books, 2020</p> <p>Knight, Amber. “Mary Shelley’s Frankenstein, Disability, and the Injustice of Misrecognition.” <i>Disability Studies Quarterly</i>, https://dsq-sds.org/article/view/7109/5809.</p> <p>The initial development of courses might be as Non-Credit or Continuing Education in order to get the idea of more disability inclusive curricula moving. In end the goal is for credited courses.</p> <p>Another area that could be considered is athletics or adaptive sports. This could be the development of a team(s) or it could be the implementation of Continuing Education courses offered, for example, to Physical Therapists and PTAs. This idea may be it’s own stand-alone recommendation.</p> <p>It is recommended that faculty be identified to be compensated and responsible for developing new curricula.</p>
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REVIEW COURSES FOR DISABILITY INCLUSION

Recommended by Subcommittee(s)	Curriculum Subcommittee
Background and Description of Recommendation	<p>The inclusion of disability in Humanities courses is slim at CCC. Disability is the one minority that people can enter and possibly leave at any time during their lives. Disability is also a minority that intersects with numerous other identities. The study of disability in the context of general education will help to demystify and reduce the stigma of disability that permeates society.</p> <p>This committee recommends there be a review of the Humanities courses at each college to identify where disability studies can be included. Department Chairs can lead or identify a team to review the existing courses and make recommendations on the inclusion of disability as it pertains to each course. Each committee should include at least one person to advocate for disability culture and history.</p>

AMERICAN SIGN LANGUAGE COURSE OFFERINGS

Recommended by Subcommittee(s)	Curriculum
<p>Background and Description of Recommendation</p>	<p>American Sign Language (ASL) is a culturally rich and complex visual language that has risen in popularity at colleges and universities in the last decade. Because of its recognition as a language and its popularity, higher education institutions have created ASL courses to satisfy world language pathway elective requirements.</p> <p>Currently, CCC offers ASL under the umbrella of Continuing Education, however, there are no credit options for degree-seeking students. Developing and implementing an ASL curriculum is a chance for CCC to center Deaf culture and the Deaf experience through language instruction.</p> <p>This committee recommends the creation and implementation of ASL classes to satisfy possible language requirements beginning at ASL I to expand in subsequent semesters as students advance in skill.</p>

REVIEW OF PROGRAM LANGUAGE AND REQUIREMENTS

Recommended by Subcommittee(s)	Curriculum
<p>Background and Description of Recommendation</p>	<p>Ableism and ableist language permeate higher education by way of policies, procedures, and requirements for students to participate in certain degree or certificate programs. While programs are bound by the requirements of their accrediting body, there is a possibility CCC has added language that unintentionally rules out or alienates students with disabilities who would otherwise qualify for the program. This language could also exist in program-specific student handbooks.</p> <p>Ex. “Verbal and written communication” excludes manual modes of communication such as American Sign Language.</p> <p>This committee recommends that each department review CCC program language to remove or revise ableist language to be more inclusive of students with disabilities.</p>

REVIEW OF PROGRAM LANGUAGE AND REQUIREMENTS

Recommended by Subcommittee(s)	Curriculum Subcommittee
<p>Background and Description of Recommendation</p>	<p>Some CCC colleges are specifically aligned with different vocations. Malcolm X offers Physical Therapist Assistant (PTA), Associate in Applied Science degree.</p> <p>Physical Therapists and Physical Therapist Assistants require multiple continuing education hours per licensure renewal period. In an effort to collaborate with clinical partners to facilitate continued learning and promote best practices in physical therapy, it is recommended that Continuing Education courses be developed. These courses will not be part of the PTA degree program. That process is governed by the Commission of Accreditation in Physical Therapy Education and the individual State Practice Acts and adjusting the degree process is beyond the intent of this recommendation and the CCC Accessibility Plan.</p> <p>This committee recommends that a small team of faculty and staff work with existing clinical partners to develop one or two initial courses that can be offered to licensed physical therapists and PTAs as continuing education that the learner can use for licensure renewal. An effort can be made to develop courses that enhance physical therapy practices for people with disabilities. There is a continuing education application process that the Illinois Physical Therapy Association (IPTA) offers. This small team would need to create a teaching plan, strategy, identify resources, complete registration and pay a nominal fee for the IPTA approval.</p> <p>One example of a Continuing Ed class offering is an Adaptive Sports Class. Details of such a class would need to be determined. These courses will help improve physical therapy practices and care for people with disabilities.</p> <p>Courses can be developed and offered in-person, virtual live, and asynchronous webinar based.</p> <p>These courses can be offered to licensed Physical Therapists and Physical Therapist Assistants through entities that CCC/Malcolm X already has relationships with, or new partners. Examples of these partners are Shirley Ryan Ability Lab, the Chicago Park District, Lurie Children’s Hospital or other rehabilitation centers and services in the Chicago area</p> <p>This PT recommendation could be considered a pilot and ultimately be replicated at other colleges. For example, Wright College offers an Occupational Therapy Assistant (OTA) Associate in Applied Science degree, and this recommendation can be adapted to add OT/OTA Continuing Ed courses, pending approval process by the IOTA (IL Occupational Therapy Association).</p>

ACCESSIBLE SOFTWARE AS UNIVERSAL DESIGN FOR LEARNING

Recommended by Subcommittee(s)	Staffing and Resources Co-sponsored by Technology
<p>Background and Description of Recommendation</p>	<p>Universal Design for Learning is a wholistic approach to education and learning. CCC can invest in accessibility software that would enhance the education of students without disabilities by providing flexibility in use for different learning styles. Two examples are Read & Write Gold and Read Speaker, which support literacy.</p> <p>This committee recommends that CCC explore accessible software options for all students to support Universal Design for Learning principles.</p>

LECTURE CAPTURING (RECORDING)

Recommended by Subcommittee(s)	Technology
<p>Background and Description of Recommendation</p>	<p>Given the diversity of the student body at City Colleges of Chicago, a great many would benefit from recorded lectures that are available after the class. This would not only help students with certain accommodations, but would benefit parents' schedules who have to juggle childcare and/or jobs along with college, along with other students in unique circumstances. This would apply to in-person and online live instruction (and as needed, to hybrid and traditional online instruction).</p> <p>This recommendation is in tandem with Accessibility Champions and the overall UDL themes in a number of recommendations.</p> <p>This recommendation involves two major components. One is acquiring, installing and training on equipment. The other is to negotiate and coordinate with faculty and the union(s) to allow the recording of lectures as a normalized, encouraged, but not required practice at CCC. A pilot program may also be necessary before opening up the program to all instructors.</p> <ol style="list-style-type: none"> 1. The acquisition of equipment might possibly be linked with the equipment needed in the High Quality Mic recommendation, also put forward by this Tech Subcommittee. Research of equipment will be necessary to determine if the two recommendations can use the same or similar hardware. The platform for housing the lecture recordings and allowing student, faculty and staff access will also need to be researched to ensure accessibility within recordings. At least one person at each college will need to be identified to be responsible for maintaining equipment and providing instruction and support on equipment use. 2. The District Office will have to propose this recommendation to the faculty and their representing union(s). Negotiations will

	<p>most likely be necessary to reach an agreement. These negotiations may include agreements about limited use of recordings.</p> <p>A budget for this recommendation will also be separated into two components. One for the hardware and software needed to record and deliver the lectures. Another for possible compensation to faculty for recording of lectures.</p>
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HIGH QUALITY AUDIO/VISUAL EQUIPMENT

Recommended by Subcommittee(s)	Technology
Background and Description of Recommendation	<p>The quality of equipment is insufficient when providing enhanced audio and recording lectures during in-person and remote class sessions at CCC. Many students and staff settle for what is currently provided but have reported that the quality lacks and proper learning and teaching are affected.</p> <p>This committee recommends identifying staff to research and identify two options to correct the situation.</p> <ol style="list-style-type: none"> 1. Set up a high-tech classroom at each college that has state-of-the-art equipment and capabilities. Once installed, instructors (in collaboration with students as per their approved accommodations) will reserve this designated room to deliver more fully accessible lessons as room availability allows. Research will be conducted about equipment, costs, and feasibility for increasing the number of classrooms with higher-quality audio capture and amplification capabilities. 2. Identify and purchase portable equipment that can be used in any classroom at each college and made available to instructors trained to use it. Though this would be of slightly lesser quality than a dedicated broadcast classroom, it will allow for more equipment to be acquired and more classes to be simultaneously broadcast and recorded. Things like lavalier mics, portable recorders and sound amplification equipment should be researched. A pilot program may also be necessary before opening up the program to all instructors. <p>This research will include submitting a detailed budget for both options. This recommendation will require oversight for set up and maintenance, which could fall under the purview of the recommended Manager of Assistive Technology and/or other relevant personnel. The research and purchase of equipment can be combined with the Lecture Capture (Recording) recommendation.</p> <p>There needs to be agreement with instructors that lessons/lectures can be recorded but will only be used for specific instructional purposes as it pertains to a student’s approved accommodations</p>

	and/or universal design for instruction purposes (and not, for instance, for marketing purposes or instructor evaluation without consent).
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FACILITIES

This section of the plan includes recommendations to updated CCC’s physical plan to comply with the Americans with Disabilities Act.

PHYSICAL SPACE ADA COMPLIANCE

Recommended by Subcommittee(s)	Infrastructure
Background and Description of Recommendation	<p>CCC conducted ADA compliance surveys of all the colleges between 2013-2015. Reports for all colleges can be made available to the committee. This committee believes the past recommendations to remedy violations were not completed, and the entire process needs to be revisited. There does not seem to be a unified protocol for addressing accessibility issues across the seven different colleges.</p> <p>This committee recommends a new Transition Plan for remedying the physical space at all seven colleges should be developed and executed. This plan should take into account the ADA Compliance Reports completed between 2013-15. ACCESS Center Directors and/or staff should be involved in setting priorities at each college. Ideas for templates for the Analysis of existing Compliance Reports and for Transition plans to remedy each violation will be included in this recommendation.</p> <p>ADA facilities plan should include any survey updates and new investments by priority. Recommended priorities are:</p> <ol style="list-style-type: none"> 1. Exterior pathways into buildings, classrooms, and student services, emergency egress paths, and emergency shelter access. A public accommodation should take measures to provide access to a place of public accommodation from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, widening entrances, and providing accessible parking spaces. 2. made available to the public. These measures include, for example, adjusting the layout of display racks, rearranging tables, providing Brailled and raised character signage, widening doors, providing visual alarms, and installing ramps or signage if necessary. 3. Access to public toilet rooms. A public accommodation should take measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps,

	<p>providing accessible signage, widening of toilet stalls, and installation of grab bars.</p> <ol style="list-style-type: none"> 4. Access to other items such as water fountains. A public accommodation should take any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation. 5. Accessible classroom/lab workstations. Ensure that each college will have the accessible furniture necessary to meet an accommodation request. This prioritizes science labs and art studio spaces. May need to research best practices at other colleges and universities to develop a complete inventory or renovations and equipment needed to meet or exceed ADA code. This includes an audit of adaptive equipment currently available for labs and studios, along with recommendations for the purchase of new equipment 6. Proper signage and wayfinding. Review existing way finding methods and remedy to meet or exceed ADA code
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FURNITURE MEETS ADA CODE

Recommended by Subcommittee(s)	Infrastructure
Background and Description of Recommendation	<p>Furniture in all public spaces, such as lounges and common areas are subject to ADA Code in addition to the physical footprint of the space.</p> <p>Any renovations of a CCC college building should include assessment of the furniture in the public spaces to ensure that it meets ADA code. This pertains to existing furniture that may continue to be used or new furniture to be purchased as part of a renovation.</p> <p>Quick reference can be found here: The ADA Guide for Small Businesses: https://www.ada.gov/smbustxt.htm</p> <p>This reference can also provide a guide for the priorities in the Physical Space recommendation to provide information regarding spaces for goods and services.</p>

EXCEED ADA CODE

Recommended by Subcommittee(s)	Infrastructure
<p>Background and Description of Recommendation</p>	<p>The ADA Code is a minimum standard in creating an accessible physical space. In an effort to distinguish City Colleges of Chicago as a benchmark collegiate institution, the Subcommittee recommends exceeding the ADA Code in targeted spaces that may bring the greatest benefit.</p> <p>As an example, automatic doors with push-plate openers are not a requirement of the ADA code on all interior doors. However, there are some locations where adding an opener and exceeding code may make sense and justify added expense.</p> <p>It is not recommended that current facilities that meet ADA code should be renovated to exceed the code. But when renovations are being planned, recommendations to exceed ADA code requirements should be considered and factored into capital investments.</p>

ADA COMPLIANCE OFFICER AND ACCESS CENTER REP ON RENOVATION TEAM

Recommended by Subcommittee(s)	Infrastructure
<p>Background and Description of Recommendation</p>	<p>Historically there is little to no representation from the ACCESS Centers in renovations being done at their college. This often includes renovations to remedy ADA code violations. All planning has been done by the District Office of Capital Planning and Construction. That office has requested input from the ACCESS Centers and the ADA Compliance staff</p> <p>A new ADA Compliance Officer and the ACCESS Center Director or other qualified staff should be a part of the program for schematic design for all renovations at their college. This would somewhat model the City of Chicago’s approach and requirement that all construction be vetted through the Mayor’s Office for People with Disabilities for accessibility before a permit is issued.</p> <p>The representative from each college will have insight into issues that are particular to their college. This insight will help guide the planning and design process so that ADA code is met, or exceeded, and everyone at their college will benefit.</p> <p>This would require attending 1-3 meetings during the programming and schematic design phase of a project – given the volume of work on the colleges, additional staff would not be required, and there should be no additional budgetary needs.</p>

PREVENTATIVE MAINTENANCE, DOOR FORCE

Recommended by Subcommittee(s)	Infrastructure
<p>Background and Description of Recommendation</p>	<p>As a part of the preventative maintenance routines at each college the interior doors with self-closing devices should be checked for the force required to open them and adjusted where possible. The building engineers have been trained and equipped to measure and adjust the force on doors in order to meet ADA code.</p> <p>Force required to open an interior door should be 5 lbs., as identified here: https://adata.org/factsheet/opening-doors-everyone#:~:text=Interior%20accessible%20doors%20should%20require,building%20codes%20may%20have%20requirements</p>

TRAINING

This section of plan includes recommendations for focused professional development to better equip faculty and staff to be more inclusive and accessible in their work at CCC.

FACULTY AND STAFF DISABILITY TRAINING

Recommended by Subcommittee(s)	Culture, Policy
<p>Background and Description of Recommendation</p>	<p>A number of comments were made during the student focus groups and via the Student Survey that referred to the need for faculty (and staff) to receive training on how to interact with students who have disabilities. Some students feel that some faculty members do not respect them, and even reported feeling that some faculty reach a point of degrading them. Some students feel that the issue is more of a need to educate faculty on ideas such as ableism and how to avoid ableist behaviors.</p> <p>Faculty and staff have also said that they feel there is a need for uniform training across City Colleges of Chicago. The fact that faculty have expressed the need for training points out that, beyond the fact that some students with disabilities desire more training for their instructors, those very instructors would like such training.</p> <p>Universal Design for Learning will be a part of this training. UDL is incorporated in a number of recommendations, but for these training purposes, it is meant to give faculty and staff an overall sense of its importance and baseline knowledge.</p> <p>Extra time for class work and tests can be fluid. Training should help faculty understand that different students will need different time extensions for various activities.</p> <p>There should be a focused training on the accessibility of labs in science courses as well. This goes beyond the physical space of the lab (there is a recommendation from the Infrastructure</p>

	<p>Committee that includes making lab space accessible) to include adaptation of the lab activities so all students fully participate and learn.</p> <p>This training should be something that all new hire faculty and staff are required to participate as part of their on-boarding. This will give them a toolbox that they can refer to as they begin in a role where they will interact with students with disabilities across CCC.</p> <p>Existing faculty and staff should also be strongly encouraged to participate in this training. This can be included as part of Faculty Development Week, or other regular meetings at each college and possibly within various departments. An incentive should be put in place, and/or possibly something to assist in lane advancement or a certificate program.</p> <p>Training can be delivered by MOPD as part of their commitment to support CCC in its quest for greater accessibility. Great Lakes ADA is another resource that can be explored as an entity to deliver training sessions. Another option is to utilize an outside vendor such as Equal Opportunity Access to craft and deliver training specifically for CCC. It is recommended that District Office staff be designated to research what organization(s) can best deliver the necessary training and the best method to deliver training across CCC.</p> <p>Eventually, CCC staff or faculty may be trained to deliver these training sessions. This option could be rolled into an Accessibility Champions program.</p> <p>Training should focus on four areas:</p> <ol style="list-style-type: none"> 1. UDL 2. Sensitivity Training 3. ADA Training 4. Accessing and Implementing Accommodations Training <p>Initially, there may be a cost involved to bring an outside organization in to deliver this training. If an ADA Compliance Officer becomes an approved recommendation and there is staff in this office, the training can ultimately be delivered in-house by this office, in conjunction with an Accessibility Champions program.</p>
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ACCESSIBILITY CHAMPIONS

Recommended by Subcommittee(s)	Technology Co-sponsored by Curriculum, Culture
Background and Description of Recommendation	<p>Faculty often do not have the tools or knowledge to create an accessible curriculum. Some materials being used are outdated and difficult or impossible to make accessible.</p> <p>An Accessibility Champions Program will have to include Faculty and Staff working together so all faculty have a resource they can access to make their curricula accessible. By implementing UDL</p>

	<p>training that emphasizes the need for accessibility, all faculty will benefit by being stronger instructors as well as creating opportunities for professional development and lane advancement.</p> <p>This requires buy-in from the Office of Instruction, especially, but also VPs and other administrators. This subcommittee does not have the bandwidth to complete all research, recruitment, and implementation of even the first steps of a high-level Accessibility Champions Program, and recommends at least one faculty member and one staff member be paid to do this.</p> <p>Ultimately a cohort of people at each college will need to be identified and internally certified/credentialed to administrate and facilitate the Accessibility Champions Program at that college. They will be given the tools to quickly recruit faculty to participate and coordinate training. Members of the Accessibility Champions program can ultimately lead general faculty and staff training sessions that educate participants in</p> <ol style="list-style-type: none"> 1. Sensitivity Training 2. ADA training 3. Implementing and monitoring accommodations 4. Training principles for accessible electronic communication and UDL 5. Training others to use technology (and technological resources) to make information more accessible to intended audiences <p>Because there is so much to learn and do, the accessibility champion program will set goals for each calendar year (and potentially each semester), promote those goals, build channels of accountability among faculty and staff for reaching those goals, and help foster a culture of accessibility at CCC that builds on previously gained knowledge to keep progressing further to meet needs of CCC communities.</p> <p>Human Resources needs to be consulted regarding compensation for faculty to attend training sessions. The goal is to have at least three Accessibility Champions at each college in the first year. This initial cohort will be trainers for subsequent Accessibility Champions.</p> <p>It is very likely that an outside vendor may be identified to conduct the initial train the trainer portion of the program, and then monitor and maintain the training. Negotiations with this vendor will address the need for initial training at seven different colleges and then a standard rate for ongoing maintenance.</p>
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DISABILITY ALLY TRAINING

Recommended by Subcommittee(s)	Culture
<p>Background and Description of Recommendation</p>	<p>In a push to be compliant, CCC offers numerous trainings on accommodations and support services inside the ACCESS Center, but tapping into professional development opportunities such as ally training will provide more cultural context about the students and employees served with accommodations. Increasing cultural and empathic competence around disability will create safe spaces for disabled CCC community members. The completion of the training should result in a tangible certificate and other displays for students to signal that they are in a safe space.</p> <p>This committee recommends either the creation or onboarding of a comprehensive and culturally competent disability ally training culminating in a certificate of completion for faculty and staff.</p>

ACKNOWLEDGEMENTS

This plan is a culmination of the efforts from numerous people; too many to list individually. The committee chairs would be remiss not to acknowledge the various groups that have contributed their time and expertise in researching and crafting this document. A key point to remember is that everyone who worked on this paper did so with the intent that it is an organic plan; the recommendations and implementation are meant to evolve as the needs of CCC students, faculty, and staff change.

ADMINISTRATORS

Administration at CCC has fully supported the creation and implementation of an Accessibility Plan from its inception. Administration at both District Office and the colleges understand the need to elevate the equity and inclusion of people with disabilities at CCC. Their support of this Accessibility Plan sends the message that all at CCC are behind these efforts, and the committee thanks them for their support.

STAFF

Staff from all colleges have played an active role in formulating recommendations. The ACCESS Center staff provided first-hand knowledge of what needs to be addressed, while staff from across the institution rallied behind the cause. The staff’s knowledge of operations at the different colleges has provided valuable feedback that contributed to a solid CCC Accessibility Plan with achievable goals for all colleges.

FACULTY

Faculty have played an integral role in identifying various needs within the classroom and the curriculum. They have been on the front lines educating students using accommodations and brought those experiences to the table. The faculty who participated in the process of developing recommendations did so out of a vision for a more accessible learning experience for their students with disabilities, but also for the student body as a whole.

STUDENTS

Input from students about their needs and experiences was deemed necessary and sought via different vehicles. Students provided an invaluable point of view when discussing accessibility issues and understanding the culture around disability at CCC. To the students who gave their time, energy, and expertise through surveys, focus groups, or by serving as an advisor for the work, the committee thanks you.