



**CHEPP**

The Center for  
Higher Education Policy  
and Practice

**ONLINE BY DESIGN:  
HOW ACCESSIBILITY IS FUNDAMENTAL  
TO LEARNER-CENTERED DESIGN**  
**POLICY RECOMMENDATIONS – JULY 2024**

## Introduction

*Online by Design: How Accessibility Is Fundamental to Learner-Centered Design* unpacks barriers that limit opportunities for learners with disabilities to enter, continue, and excel in higher education. These barriers focus broadly on the burden of proof and the need for accommodation being placed on learners, the lack of belonging that exists across systems, the lack of available data on learners with disabilities, and the challenge of true inclusion and, relatedly, persistence and degree completion. Learner-centered design offers an opportunity to focus accessibility and inclusion at the forefront of the higher education experience, and the paper outlines key elements of a more accessible education.

To create inclusive and accessible institutions of higher education for learners with disabilities, policy changes at multiple levels of higher education are needed. These policies range from institutional and practitioner policies that can be implemented in the short term to other organizational policies that will require significant cultural and system-wide shifts. There are also policy changes needed at the federal level – from guidance that would set a roadmap to ideal regulatory changes and updates to federal laws for meaningful and lasting change.

The following recommendations are structured around CHEPP’s learner-centered design framework [Figure 1]. The framework provides context for why the policy changes are ultimately necessary: to support the learner and their journey toward economic safety and mobility. The various actors and their roles in the policies impact the learner experience and how likely a learner with a disability is to succeed. To make higher education more accessible and inclusive for learners with disabilities, swift and decisive action must be taken, beginning with the following recommendations.

# Mission & Culture

## Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Adopt an overarching vision or mission statement that commits to, and has clear goals aligned to, having fully inclusive and accessible systems for learners with disabilities.
- Support and utilize human capital policies that reflect clear expectations aligned to prioritizing serving learners with disabilities, including through inclusive hiring and management policies for faculty and staff.
- Provide adequate staffing resources to fully execute accessibility systems, including appropriately staffing accessibility offices, ensuring accessible technology expertise, and having a well-trained compliance team.
- Establish a governing body dedicated to ensuring full compliance with Title III of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.
- Provide and plan for accessibility and accommodations through a centralized budget process, such as an institution's general fund, to ensure more consistent and equitable access to accommodations and assistive technology across programs and systems.
- Evaluate internal request for proposal (RFP) processes for accessibility and, through this evaluation, implement new procurement policies that require meeting standards of accessibility, and apply this evaluation and policies to all contracting and purchasing of equipment system wide.
- Apply a continuous improvement mindset to accessibility for learners with disabilities by using, and acting on, existing data and developing and utilizing leading indicators on persistence and success to identify gaps and better support learners, as well as inform policies and practices across the institution.

## Federal Policy Recommendations

- The Department of Education, through regulatory or congressionally directed action, should collect and track comprehensive, longitudinal data on students and learners with disabilities in higher education to inform future policy decisions related to their ability to access and succeed in college. Such data should be used to surface persistence and completion increases linked to best practices and accessibility efforts.
- Accreditors should require institutions to meet accessibility standards and use data to inform how programs and institutions are evaluated during their review process to drive a continuous improvement approach.
- Congress should establish an office of postsecondary access within the Office of Special Education and Rehabilitation Services. Responsibilities should include ensuring that data from institutions regarding graduation rates, degree completion, access, and accommodations is made public to students to ensure effective and responsible decision-making in selecting institutions to attend (e.g., College Scorecard data).

# Academic Relevance & Engagement

## Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Evaluate internal hiring, training, and education for faculty and staff to ensure that disability and accessibility training is embedded to create more accessible and inclusive coursework, and that the trainings and educational opportunities include system-wide adoption of Universal Design for Learning (UDL) as a core instructional practice.
- Develop internal accessibility assessment processes to test, review, evaluate, and improve accessibility across all colleges, programs, labs, and specialized settings.

## Federal Policy Recommendations

- The Department of Education should release guidance through the Rehabilitation Act Section 504 to support best practices that empower students with disabilities in their transition planning from K-12 systems into postsecondary education. Such guidance may be in coordination with the Department of Justice and the requirements of institutions under the ADA.
- Congress should require institutions to accept certain documentation as evidence of a disability, including individualized education programs (IEPs) (e.g., such as outlined in the [RISE Act](#) (Respond, Innovate, Succeed, and Empower Act)).
- Specialized accreditors should be aware of and review programs on the application of specialized accessibility tools that allow learners with disabilities to fully participate in the relevant program of study (e.g., science lab accessibility needs in a biology program).
- Congress and the Administration, in all efforts related to artificial intelligence (AI), should ensure that algorithmic bias against people with disabilities is addressed and guardrails are in place. As new tools are developed, best practices in the use of AI should be shared as AI can and will continue to be an accommodations tool for learners with disabilities.

# Learner Agency & Awareness

## Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Offer multimodal education program delivery, such as on-campus, hybrid, and online, allowing for student choice and support within each type of program delivery.
- Prioritize flexible use of time, such as [competency-based education](#), which replaces seat time, credit hours, and grades as the measures of student progress and completion with measurement of their demonstrated knowledge and skills.
- Develop and implement institution or system-wide policy to consistently accept certain documentation from learners as evidence of a disability, including IEPs, 504 plans, and other such documentation, and communicate clearly with incoming, current, and potential learners.

## Federal Policy Recommendations

- The Department of Education should develop guidance in the closed school and program process and require accessibility plans and coordination for students with disabilities transferring or participating in a teach-out agreement.
- Congress should ensure that students with disabilities who receive accommodations for their pace of study are eligible for Title IV financial aid grants aligned with their academic pacing (e.g., such as proposed by the [Pell Grant Flexibility Act](#) and the [Higher Education Grant Flexibility Act](#)).
- Congress should allow institutions to test and learn how to distribute Title IV financial aid for learning based on knowledge and subject mastery in lieu of time using the credit or clock hour (e.g., such as proposed in the [Empowering Learners Through Competency-Based Education Act](#)).
- Congress should create monetary incentives or rewards for institutions of higher education that excel at meeting the needs of students with disabilities regarding accommodations and accessibility in an accountable and measured way and for institutions that commit to continuing to do such work.

# Student Experience

## Institutional and Practitioner Policy Recommendations

Institutions of higher education should:

- Develop, evaluate, and invest in a robust office of disability support or office of accessibility to centralize accommodations across the systems and provide proactive outreach to students. The office should be adequately staffed and funded based on the size of the institution of higher education and should collaborate with other diversity offices within the institution of higher education to ensure that students receive support across the continuum of their needs and not in silos. Policies within and across offices should be evaluated and outreach coordinated.
- Develop and disseminate inclusive policies across the institution to require and promote accessibility, inclusion, and belonging in all spaces: these should include providing sample language for all programs to use in materials, for consistency, and developing and explaining accommodations that are available to all students prior to requests, which may include extra time on tests, part-time flexibility, and additional options pre-established by each institution.
- Create programs and activities that enhance belonging, such as by including accommodations and access information in orientation and welcome activities, developing peer ambassadors, and collaborating with other diversity efforts.
- Use data to continuously improve available accommodations based on student success, including assessing and evaluating emerging best practices to support learners with mental health disabilities, such as leaves of absence and other forms of release time.

## Federal Policy Recommendations

- Congress should require institutions of higher education to have an office of accessibility. In addition, they should develop a pilot program that provides institutions funding to expand their accessibility and disability services, including accessible technology, a broadened range of accommodations, additional staff, and alterations to physical spaces through centralization of budgeting and prioritization of accessibility budgets within the institution of higher education.
- The Department of Education, through the Institute of Education Sciences, should develop a clearinghouse for evidence-based best practices in accessibility and accommodations in higher education, conducting research on the impact of different accommodations on learner success and hosting activities to highlight institutions that excel at implementation.
- The Department of Education must issue regulations under the Rehabilitation Act's Section 504 regarding the obligations of institutions of higher education's obligations to be accessible and provide accommodations to students with disabilities in higher education.
- The Department of Justice should build on recent action improving web access at public institutions by issuing regulations under Title II of the ADA that require private institutions to make online content accessible to people with disabilities.