

Report on Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: Progress on the Path to Education, Employment, and Community Living

REPORT TO:
United States Secretary of Education
United States Senate Committee on Health, Education, Labor and Pensions
United States House of Representatives Committee on Education and Labor
National Advisory Committee on Institutional Quality and Integrity

The National Coordinating Center Accreditation Workgroup
May 2021



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NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY



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DISCLAIMER

The Report on Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: Progress on the Path to Education, Employment, and Community Living reflects the views of the members of the Think College National Coordinating Center Accreditation Workgroup and does not necessarily reflect the views of the Secretary of Education or the U.S. Department of Education.

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May 2021

The Honorable Miguel Cardona, Ed.D.
Secretary of Education

Dear Mr. Secretary:

The Think College National Coordinating Center Accreditation Workgroup is pleased to present this report: *Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: Progress on the Path to Education, Employment, and Community Living*.

This statutorily mandated report is submitted to you in accordance with requirements in the Higher Education Opportunity Act (HEOA) enacted in 2008, which authorized federal financial aid for students with intellectual disability (ID), new model programs, and the Think College National Coordinating Center (NCC). HEOA requires the NCC to convene a workgroup of experts to develop model program accreditation standards and identify the key components of higher education programs for students with ID. This report of the 2016–2020 Workgroup builds on the work of the previous 2011–2015 Workgroup and reflects findings from a field test of the standards as well as significant public input. I am grateful to the NCC for their support and to the Workgroup members who volunteered five years of effort conducting research and gathering public input, culminating in this report.

The education, employment, and community outcomes for individuals with ID have historically been bleak in our country, with the vast majority living in poverty and relegated to subminimum wage jobs in sheltered workshops, or living at home with aging parents and little productive work or activities. Prior to 2008, a number of higher education programs for students with ID had sprung up around the country, but there was no federal financial aid or federally funded technical assistance, and there were no model programs to encourage the expansion of this important educational movement.

As of May 2021, there are 308 postsecondary education programs in the United States enrolling over 6,500 students with ID—an increase of 62 programs since the last report. Since the Department of Education started funding model Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSIDs) in 2010, projects have been funded at 121 colleges and universities in 34 states. As colleges and universities open their doors to students with ID, these individuals are experiencing substantially better outcomes in employment, social engagement, and community living as indicated by the NCC evaluation results detailed in this report.

A key to this success is the requirement in HEOA that students with ID enrolled in such programs must be included with nondisabled individuals in academic and employment settings. This is the first time in federal law that Congress has required that a student with disabilities be included for a specific minimum percentage of time with nondisabled students and individuals. Prior to the passage of HEOA, many programs were primarily not inclusive. Since HEOA passed in 2008, much progress has been made in inclusive course access, as well as inclusion in work experiences and in campus communities. Factors contributing to this success include the funding of the TPSID programs, technical assistance provided by the NCC, and the adoption of effective practices such as the use of Universal Design for Learning principles, person-centered planning, involvement of peer mentors, career preparation and development, and the desire of programs to be approved

for financial aid purposes. Further progress will be made as the accreditation standards are implemented.

These updated model accreditation standards will provide guidelines for colleges and universities on how to develop and improve programs, validate these programs within institutions of higher education, and give students and their families an assurance of quality. Accreditation standards will move the field forward on the path to real opportunities for students with ID to experience higher education resulting in competitive integrated employment and community living.

Respectfully,

A handwritten signature in cursive script that reads "Stephanie Smith Lee".

Stephanie Smith Lee, Chair

Think College National Coordinating Center Accreditation Workgroup

The same letter of transmittal was sent to the United States Senate Committee on Health, Education, Labor and Pensions; the United States House of Representatives Committee on Education and Labor; and the National Advisory Committee on Institutional Quality and Integrity.

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Vanderbilt University, TN
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Massasoit Community College, MA
Mercer County Community College, NJ

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State of the Art Conference on Inclusive Postsecondary Education and Individuals with Intellectual Disability (SOTA)

National Down Syndrome Congress (NDSC)

All Born (In) Northwest Down Syndrome Association (ABI)

Association of University Centers on Disabilities (AUCD)

Thanks also go to The Arc of the United States for providing meeting space and support.

EXECUTIVE SUMMARY

Overview

The Higher Education Opportunity Act (HEOA) enacted in 2008 created new opportunities for students with intellectual disability (ID) to access federal financial aid, and authorized both new model programs and a National Coordinating Center (NCC). The NCC, administered by Think College at the Institute for Community Inclusion at the University of Massachusetts Boston, is charged with providing technical assistance, coordination, and evaluation of the model programs.

The NCC is also required by the HEOA to convene a Workgroup to develop and recommend model criteria, standards, and components of higher education programs for students with ID. The National Coordinating Center Accreditation Workgroup issues this report in response to that statutory requirement.

The first National Coordinating Center Accreditation Workgroup was established in 2011 and completed its work in 2015. That Workgroup developed, for the first time, model program accreditation standards for these programs and authored [a report](#) to Congress, the Secretary of Education, and the National Advisory Committee on Institutional Quality and Integrity or NACIQI, as required by Congress (National Coordinating Center Accreditation Workgroup, 2016).

The second NCC Accreditation Workgroup began its work in 2016 and concluded in 2021 with this report. This Workgroup conducted a field test of the model standards developed by the first Workgroup, held sessions to gather public input, surveyed programs regarding their interest in becoming accredited, and reached out to existing accreditors to ascertain interest in using the model standards.

The updated model program accreditation standards follow, and the complete standards, guidance, and review requirements may be found at the end of this report (see page 41). These revised standards reflect a significant step forward in creating authentic and high-quality higher education opportunities for students with ID. The recommendations in the report to Congress, the U.S. Department of Education, the National Coordinating Center, and the next Workgroup will support and enhance progress in this field.

The current Workgroup, created in 2021, will focus on developing and field-testing an accreditation process and addressing issues involved in creating an accrediting agency and implementing accreditation. The implementation of model accreditation standards will move us forward on the path to inclusive higher education opportunities that lead to competitive integrated employment and community living.

Establishing and implementing model program accreditation standards will create benchmarks that will be useful for quality assurance and improvement of higher education programs enrolling students with ID. These standards will be used to validate and strengthen programs and provide guidelines for colleges and universities considering establishing high-quality programs. The model standards will be valuable for institutions of higher education and accrediting agencies, as well as students with ID and their families.

The challenges identified in this report are real and persistent. However, the progress that has been made on the path to education, employment, self-determination, and community living is also real, substantial and exciting. The finalization of the model accreditation standards and the introduction of an accreditation process will be invaluable tools for inclusive postsecondary education programs as they continue to evolve and students continue to strive to obtain employment and community living.

Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability

Mission Standards

Mission Standard 1:

The program has a written mission statement that is consistent with the Higher Education Act (HEA) requirements that the program is a “degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID) who are seeking to continue academic, career and technical, and independent living instruction” in order to obtain competitive integrated employment (CIE).

Mission Standard 2:

The written mission statement is communicated to prospective and current students, families, staff, faculty, and the public, and is reviewed at least every third year or sooner if there are significant changes to the program.

Student Achievement Standards

Student Achievement Standard 1:

The program has established a Satisfactory Academic Progress (SAP) policy that includes criteria for evaluating student progress in academics, socialization, independent living, and career development, and the impact of such evaluation on student advancement towards program completion. The program specifies how students advance through a full course of study and maintains satisfactory academic progress.

Student Achievement Standard 2:

The program has established a program level Student Learning Outcomes (SLO) assessment plan and a process that allows it to measure student achievement in varied domains including academics, socialization, independent living, and career development.

Student Achievement Standard 3:

The program provides individualized learning plans for the student, for each college catalog course attended by the student, that identifies: what the student is expected to learn; how the student will be evaluated; and supports, strategies, accommodations or modifications that are needed for the student to master essential learning.

Student Achievement Standard 4:

The program provides students with a written report at the end of each “academic unit” (semester, trimester, etc.) understandable to the student, that clearly indicates evidence of student progress in the areas of academics, socialization, independent living, and career/employment.

Student Achievement Standard 5:

The program sets goals for student pace of completion and retention rates that are ambitious but attainable and appropriate to the mission of the program. The program monitors and reports pace of completion and retention rates.

Curriculum Standards

Curriculum Standard 1:

The program has an inclusive program of study that aligns with the statutory and regulatory requirements for a comprehensive transition and postsecondary (CTP) program in the Higher Education Act (HEA) law and regulations and is consistent with the program’s mission and program outcomes.

Curriculum Standard 2:

The program utilizes and documents a person-centered planning approach that provides for maximum choice for the student within the inclusive program of study.

Curriculum Standard 3:

Students with intellectual disabilities participate in a wide array of postsecondary level courses from multiple disciplines and departmental/college units that are part of the curriculum for degree or certificate programs.

Curriculum Standard 4:

The inclusive program of study is delivered to students physically attending the institution, with some distance learning allowable if it is applicable to and benefits students with intellectual disability.

Curriculum Standard 5:

The inclusive program of study includes instruction, internships, apprenticeships or other work-based learning, and other career development activities necessary to enable students to achieve and sustain competitive integrated employment (CIE) aligned with person-centered goals.

Curriculum Standard 6:

The inclusive program of study includes student engagement in inclusive social experiences and other campus-based activities. Individualized support, instruction or activities necessary to enhance student social competence must be included in the inclusive program of study.

Curriculum Standard 7:

The inclusive program of study includes individualized support, instruction, or other activities designed to support development of students' independent living skills and be guided by each student's person-centered plan.

Faculty and Staff Standards

Faculty and Staff Standard 1:

Staff and other professionals that work directly for the program have education and training commensurate with their roles and responsibilities and participate in ongoing professional development and training.

Faculty and Staff Standard 2:

The program must ensure coordination of services and supports between the program and staff and other professionals who do not work directly for the institution but serve in a support or instructional capacity for the students.

Faculty and Staff Standard 3:

Program staff receive a job description that lists roles and responsibilities. Performance criteria are clear, and evaluation is conducted on a regular basis, consistent with the policies of the institution.

Faculty and Staff Standard 4:

Program management and leadership are retained for a reasonable period of time.

Faculty and Staff Standard 5:

Other individuals who work with students, such as peer mentors and pre-professionals or professionals-in-training (such as individuals training to become educators, counselors, speech and language pathologists, occupational or physical therapists) are trained and supervised.

Faculty and Staff Standard 6:

Training and technical assistance are provided to the institution's faculty and staff to develop learning environments, courses, and instruction according to the principles of Universal Design for Learning (UDL).

Faculty and Staff Standard 7:

Information and support about the impact of an individual student's disability on learning, and strategies to support, instruct, and assess the student, are offered to the institution's faculty and staff to improve and optimize the student's learning in courses taught by that faculty or staff.

Facility, Equipment, and Supply Standard

Facility, Equipment, and Supply Standard 1:

Students in the program have access to institutional facilities, equipment, and supplies consistent with other students with the same student status.

Administrative and Fiscal Capacity Standards

Administrative and Fiscal Capacity Standard 1:

The program is a part of a department or unit of the institution, with a recognized place within its administrative structure.

Administrative and Fiscal Capacity Standard 2:

The program seeks and considers ongoing input on program development, policies, and practices from a variety of stakeholders that includes students, alumni, and parents.

Administrative and Fiscal Capacity Standard 3:

Programs have a viable plan for current and future fiscal sustainability.

Student Services Standards

Student Services Standard 1:

The admission policies and practices ensure that all students who are admitted meet the definition of a “student with an intellectual disability” in the Higher Education Act (HEA) law and regulations.

Student Services Standard 2:

The program provides academic, employment, personal, and other advising and counseling, based on person-centered planning and individual interests and needs, and in collaboration with existing institutional services.

Student Services Standard 3:

Students and families are included in the institution’s general orientation programs and additional orientation is provided as needed.

Student Services Standard 4:

General information regarding the institution and the program is communicated to students and families on an ongoing basis. The program has a stated process for family engagement and communication that reflects clearly defined roles and responsibilities for students, families, and staff.

Student Services Standard 5:

Students in the program have access to services and social and recreational activities, consistent with other students with the same student status.

Student Services Standard 6:

Individualized supports are provided to students designed to enable the students to seek and sustain competitive integrated employment (CIE). Supports are provided based on the student’s interests and person-centered plan.

Length and Structure of Program Study Standards

Length and Structure of Program of Study Standard 1:

The program aligns with the college calendar and specifies the number of weeks of instructional time and the number of clock hours in the program, including the equivalent clock hours that fulfill requirements of the program credential.

Length and Structure of Program of Study Standard 2:

The program clearly describes the educational credential or credentials offered (e.g., degree, certificate, or non-degree credential) that is issued by the institution.

Student Complaints Standards

Student Complaint Standard 1:

The program has established relationships with offices within the institution involved with student complaints or discipline, in order to facilitate communication and collaboration.

Student Complaints Standard 2:

The institution’s grievance procedures are understandable, provided to, and discussed with students in the program and their parents.

Student Complaints Standard 3:

Support is provided to students who have complaints lodged against them as well as students who seek to lodge a formal written complaint. Support is available throughout the grievance process and throughout any actions that result and if a student is at risk of being expelled or urged to exit the program.

Program Development, Planning, and Review Standards

Program Development, Planning, and Review Standard 1:

The program, along with key stakeholders, evaluates its program components, student assessment practices, student services, policies, activities, student learning outcomes, and program outcomes at a minimum of every three years. The program implements program revisions based on the evaluation for continuous quality improvement.

Program Development, Planning, and Review Standard 2:

The institution verifies that students who receive federal financial aid meet the definition of a student with an intellectual disability in the Higher Education Act (HEA) law and regulations.

Recommendations to Congress and U.S. Dept. of Education

The “National Coordinating Center Accreditation Workgroup” section of this report describes challenges and emerging issues in the field of inclusive postsecondary education (IPSE), the field test of the standards conducted by the Workgroup, public input, lessons learned, and the resulting Workgroup recommendations to Congress and the U.S. Department of Education summarized below.

Recommendations to Congress

- Fund the creation of a new accrediting agency to accredit comprehensive transition and postsecondary (CTP) programs.
- In the next reauthorization of the Higher Education Act (HEA), substitute “competitive integrated employment” for “gainful employment” in the definition of “comprehensive transition and postsecondary program for students with intellectual disabilities.”
- Allow all students with disabilities to submit their Individualized Education Program (IEP), 504 Plan, or prior evaluation as documentation of their disability to obtain accommodations in college, so the students do not need to go to the expense and trouble of obtaining a new evaluation prior to attending a college or university. (See [H.R.7308, the RISE Act.](#))
- Fund technical assistance to provide students with all disabilities and their families information on college disability services and how to access them and to provide college faculty training and resources on best practices to support students with disabilities. (See [H.R.7308, the RISE Act.](#))
- Fund pilot programs for disability service offices to provide services for students with all disabilities beyond the minimum accommodations required by the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

Recommendations to the Department of Education (ED)

- Fund the development and dissemination of resources and strategies to use in determining what an individual student with ID is expected to learn, and how to assess progress in traditional classes, based on best practice. Such resources and strategies are needed to determine student progress in all areas (academic, career or technical, and independent living).
- Fund research on the impact of student status on access to and participation in services and social and recreational activities, and how the issue of student status may affect the development of the accreditation process and best-practice guidelines.
- Correct the misinformation provided to Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) applicants and on the Department website regarding the definition of ID. The definition needs to be in accordance with the ID definition in the Higher Education Act (HEA) law and regulations (that state how to document an ID if the student is not identified as having an ID in K–12 education).
- Develop a method to create an equitable geographic distribution and to serve underserved areas for future TPSID grants, as required by the HEA.
- Include the competitive preferences required in the HEA in the next Request for Proposals for TPSID grants.
- Review the selection of and training provided to CTP peer reviewers to ensure that there is a clear understanding and application of the definition of ID and other provisions in the law and regulations.
- Highlight and broadly share employment and other positive outcomes of comprehensive transition and postsecondary programs.
- Highlight and broadly share examples of collaboration between vocational rehabilitation agencies and programs and examples of collaboration between local education agencies and programs.

Recommendations to Both Congress and ED

- Identify and address legislative and administrative barriers to participation by postsecondary students with ID in accessing and meaningfully participating in:
 - » Vocational rehabilitation services and funding
 - » Individuals with Disabilities Education Act (IDEA) dual enrollment and the use of IDEA funds for transition age students still eligible for IDEA services
 - » Higher education benefits for children of veterans
 - » Industry recognized credential programs
 - » Apprenticeship programs

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In Memoriam

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Associate Provost Emeritus, New Mexico State University, representing the National Advisory Committee on Institutional Quality and Integrity

INTRODUCTION

The Importance of Inclusive Postsecondary Education

To assert that one of the most unique advancements in education developed in the past half century is inclusive postsecondary education for persons with intellectual disability (ID) is not an overstatement. This idea was convincingly articulated in the [Report on Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: A Path to Education, Employment, and Community Living](#) developed by the 2011–2015 Accreditation Workgroup convened by the Think College National Coordinating Center (NCC; National Coordinating Center Accreditation Workgroup, 2016). Postsecondary education for these individuals represents a consequential life-altering pivot—a pivot in ideas, experience, and expectations that can help a person with an ID to drive toward imagined and attainable life aspirations. At the time of publication there are approximately 308 programs across the country, which focus on inclusive academic courses and employment preparation and placement, including internships and apprenticeships, social inclusion, and independent living.

Understanding fully the positive impact of higher education, many stakeholders, including individuals with ID, their families, and the professionals who support them, began to intensify pressure to create postsecondary opportunities for youth and other young adults after they completed K-12 education. Congress presciently recognized the value of increasing postsecondary options for this population of individuals and enacted in the **Higher Education Opportunity Act of 2008** (HEOA) provisions to facilitate access to postsecondary education and eligibility for certain types of financial aid. Congress also authorized model demonstration grants, Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSIDs), and mandated the creation of a national coordinating center to provide technical assistance and evaluation across programs, and to “convene a workgroup and recommend model criteria, standards and components of such programs.....that are appropriate for the development of accreditation standards” (Higher Education Opportunity Act, 2008).

As directed by Congress, the NCC established the Accreditation Workgroup in 2011, and a new Workgroup in 2016. As with other innovations that represent a significant departure from past practice, it was essential for the Workgroup to continue its labors. The growth and expansion of postsecondary programs for students with ID have led to improvements to program practices and have brought to light emerging challenges. These developments led to refinement, clarification, and in many cases, outright invention of new systems in the field. Consequently, these emerging systems and practices will have a continuing impact on program accreditation.

Thus, the longevity of the NCC’s authorization conveys the weighty responsibility placed on the Center and the Accreditation Workgroup by Congress to develop the model criteria and program standards sought for these programs. The hope and expectation is that the model standards will foster high quality programs and facilitate better integration and alignment of postsecondary education programs for students with ID within the larger institutional framework of their college or university. It is also of paramount importance that the model standards will undergird the expansion of inclusive postsecondary education (IPSE) programs for more youth and adults with ID and ensure they have opportunities to master abilities that lead to a self-determined life, such as:

- Increasing knowledge;
- Accessing, entering, adapting to, and navigating a learning environment beyond the K–12 education years;
- Continuing to learn and to make one’s own choices about what to learn in adulthood;
- Developing and maintaining deep social connections with family and friends;
- Belonging and contributing to a community;
- Working in a chosen field of employment in an integrated setting and developing career goals and other life goals that extricate a person from poverty;
- Connecting to and securing assistance in the form of services and supports; and
- Finding and living in a place of one’s own choice.

Within the world of disability, the terms “self-determination” and “living independently in the community” are periodically used interchangeably. However, a nationally known disability advocate, Thomas Nerney, developed “both the philosophy and the practice of Self-Determination” based on these principles: freedom to decide how one wants to live their life; authority over a targeted amount of dollars; support to organize resources in ways that are life enhancing and meaningful to the individual; responsibility and confirmation. He specified a broader meaning than simply living independently in one’s own place, which is sometimes the stated and/or implied meaning of the term independent living. Self-determination requires that the individual have the personal capabilities and the economic freedom to live a life of one’s own choosing and the authority over decisions pertaining to matters such as career goals, personal and social interactions, employment and resources, community involvement, and, yes, living in one’s own place in the community (retrieved April 1, 2021, from <http://www.self-determination.com/index.php>).

The path of education should by its nature foster self-determination. As Thomas Nerney stated, “self-determination encourages aspirations, which people with disability have historically not been allowed to have” (Nerney, 2019). Therefore, education should provide experiences through academic, institutional, and social inclusion that develop and strengthen the capability of individuals to determine not only where in the community they want to live an independent life, but also to determine the way in which they choose to belong and contribute to community.

The Utilization of Model Program Accreditation Standards

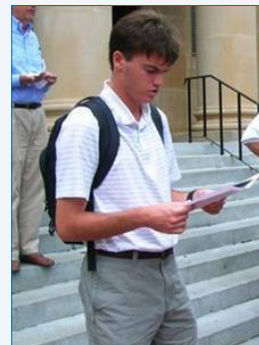
The development of the system of accreditation in higher education in the United States is a long and complex evolution. In brief, before and during the 19th century, but particularly at the end of that century, accreditation became a system interwoven in the fabric of higher education and evolved with it. This occurred “at a time when it was becoming problematic that no single point of control or central body existed to set educational standards...” (Congressional Research Service, 2020). Also, “there was no consensus on the content of the educational programs offered by postsecondary educational institutions or the distinction between educational offerings at secondary and postsecondary institutions. As a result, private voluntary membership associations came into existence to clarify the difference between high school and college and to define guidelines and procedures for peer review...” (Congressional Research Service, 2020).

It is clear that there is a glaring peculiarity in the embryonic diversity and individuality of IPSE programs that are inventing themselves in states and across the country over more than a decade. While the college or university is accredited, and the department or academic unit in which the IPSE program is situated may be accredited, the IPSE program is not. There is as yet no formal way to measure the academic rigor and quality of these postsecondary programs. Absent standards based on validated criteria it is difficult to credibly demonstrate the value of the IPSE program to stakeholders such as individuals with ID, families, faculty and administrators, potential employers, funders, governments, and the larger society. This is of paramount concern for stakeholders who must grapple with the fact that individuals with ID were not until recently admitted to institutions of higher education or expected to enroll as students.

The revised model program accreditation standards published in this report by the NCC are intended by Congress to be national in scope—applicable for the numerous, disparate, and highly individualized

Alston Bailey Graduate of Clemson LIFE at Clemson University

“What I liked best about college was going to swimming, archery, basketball, and general physical education classes, living with my roommates, walking around campus, and making friends with other students. In college I learned how to live on my own and work two jobs. After college I was working two jobs until COVID-19. I am working at Publix now. I hope to go back to my other job at the school when COVID is over as well. College helped me build confidence to work and to live independently and to be successful.”

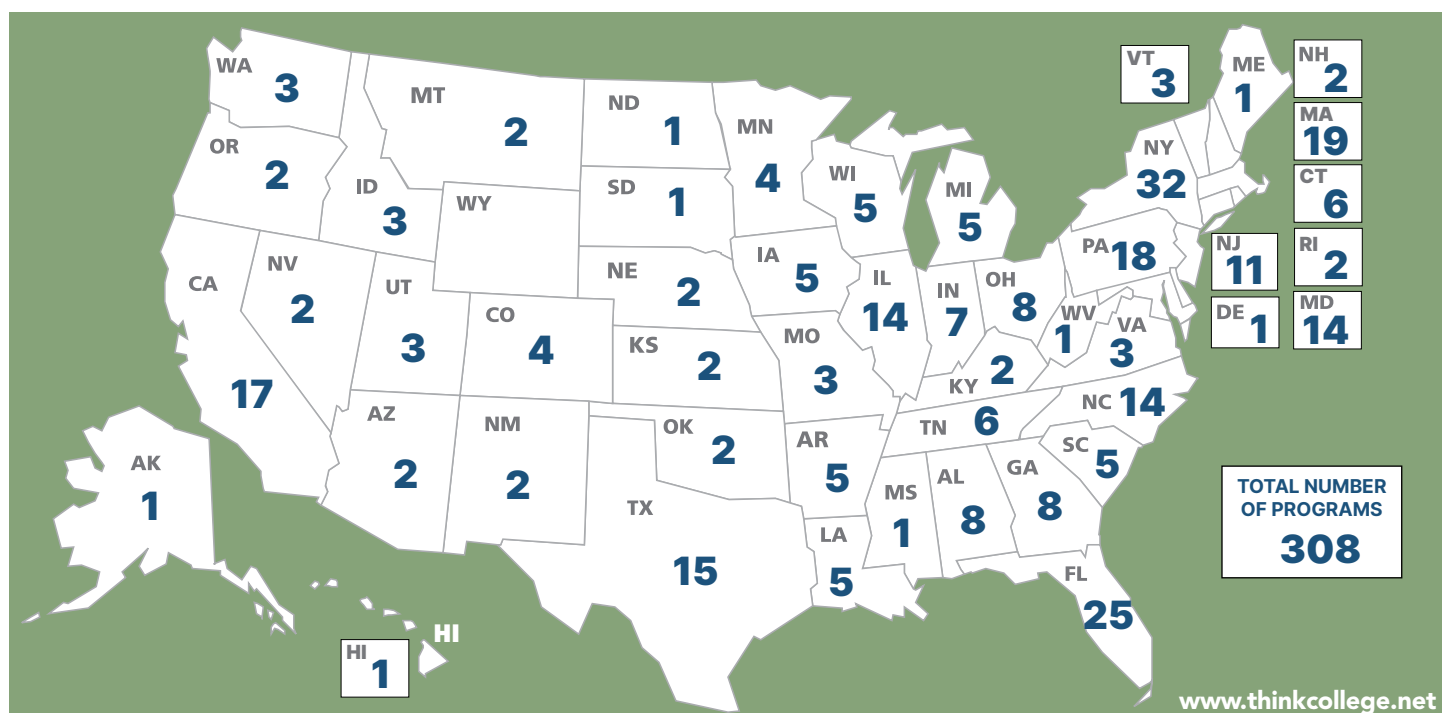


inclusive postsecondary education programs across the country in community colleges, vocational technical institutions, colleges, and universities. Additionally, these model standards are now available for use on a voluntary basis. They may be utilized in multiple ways—in training, in public awareness efforts, in providing technical assistance and in piloting change, in implementing continuous quality improvements, and by students and families making decisions about applying for admission. Once a new accrediting agency is in place, there will be a periodic evaluation process involving self-study and a review by peers and program accreditors to provide an assurance of quality. This undertaking is explicitly intended to lead to oversight and accountability, and, of course, to support continuous quality improvement.

The Broad Landscape of Reform Legislation

The development and expansion of postsecondary education programs for individuals with intellectual disabilities witnessed in the past decade has been extraordinary. As of the publication of this report, there are 308 colleges and universities enrolling over 6,500 students with ID—a 107% increase in the number of programs since 2009 (Grigal, in press; see also Figure 1). Whether considering, for example, the great interest of the many who now eagerly seek out and explore information regarding postsecondary education possibilities, including by frequenting the Think College website, or, alternatively, the enthusiasm expressed by many individuals with disability and family members who typically attend the annual State of the Art Conference on Inclusive Postsecondary Education and Students with Intellectual Disability, it is evident how pleased families are that continued learning is an option for their sons and daughters with intellectual disability.

FIGURE 1: COLLEGE OPTIONS FOR STUDENTS WITH INTELLECTUAL DISABILITY, APRIL 2021



COLLEGE OPTIONS FOR STUDENTS WITH INTELLECTUAL DISABILITIES

But to properly understand the current landscape, one must also appreciate the emergence of postsecondary education as a movement significantly accelerated by the passage of HEOA and other systems-based reform legislation enacted or introduced that are designed to modernize disability services and supports. In the 2014 passage of the very significant **Workforce Innovation and Opportunity Act (WIOA)**, competitive integrated employment (CIE) was defined and prioritized for the first time in law as the expected outcome for students and youth with disability who receive vocational rehabilitation funds. Equally important, the legislation placed constraints on the use of subminimum wages by provider agencies. WIOA emphasized

the need for more substantive memoranda of understanding (MOU), that is, collaboration agreements, defined and negotiated across state agencies such as education, vocational rehabilitation, Medicaid, and others. WIOA also specifically requires Vocational Rehabilitation agencies to provide counseling on opportunities for enrollment in comprehensive transition or postsecondary education programs at institutions of higher education for students and youth between the ages of 14 and 24. This language refers to postsecondary programs for students with intellectual disabilities. WIOA, the **Individuals with Disabilities Education Act** (IDEA) and the **Higher Education Act** (HEA) are all overdue for reauthorization, although it is not clear when reauthorization will occur.

In addition to the HEOA and the WIOA, the **Stephen H. Beck, Jr., Achieving a Better Life Experience Act** of 2014 (ABLE Act) authorized the creation of a tax advantaged saving account for families and individuals with disabilities. According to the ABLE National Resource Center, nationwide over 75,500 Americans with disabilities have opened ABLE accounts in 43 states plus the District of Columbia, and have saved more than \$538.3 million for their disability expenses. Prior to the passage of ABLE, individuals and their families had no tax-advantaged way to save for expenses that were disability related.

The ABLE account funds are used to pay for qualified disability expenses such as health, education, housing, employment training, transportation, technology and other needs that arise across the lifespan. There is an annual maximum contribution limit of \$15,000, and an essential stipulation of the act is that the ABLE account funds do not jeopardize Supplemental Security Income (SSI), Medicaid, or other federal benefits. This allows individuals with disabilities and their families, for the first time, to save for postsecondary education while retaining important benefits.

The following pieces of legislation are likely to be reintroduced in the 117th Congress that convened in January 2021 as part of an unfolding process of bringing coherence and alignment to the system of services and supports for youth and adults with disability. If passed, the legislation would have a significant impact on students with ID seeking to attend postsecondary education programs and obtain competitive integrated employment in the community.

- The **Disability Employment Incentive Act (2018)** would strengthen three existing tax credits and incentivize small and large employers to hire and retain people with disabilities.
- The **Disability Integration Act (2019)** is a comprehensive bill that would establish that long term services and support occur in the most integrated settings and ensure to the greatest extent possible control of individuals with disability over decisions affecting their lives.
- The **National Apprenticeship Act Reauthorization (2020)** updates the Act that authorizes the U.S. Department of Labor to manage the Registered Apprenticeship (RA) system in the U.S. RAs require on-the-job learning and academic instruction and are expected to culminate in apprentices earning a nationally recognized credential. The bill would expand programs in occupations that have not traditionally been included; recruit persons who have not tended to participate in these programs in the past, including individuals with disabilities and persons from economically disadvantaged families; and support industry and equity intermediaries to create partnerships to increase access to apprenticeships for individuals from diverse populations.
- The **Office of Disability Policy Act (2018)** would provide Members of Congress and the public with information about how a proposal to change a program would affect individuals with disabilities, their families, and services providers.
- The **Raise the Wage Act (2019)** would eliminate the use of subminimum wages to pay persons with disabilities in employment under Section 14(c) of the Fair Labor Standards Act.
- The **Respond, Innovate, Succeed and Empower Act (RISE) (2019)** stipulates that documented proof of a disability that a student had utilized in the past, such as an IEP or 504 Plan, would continue to be usable, valid proof of disability for purposes of obtaining disability services and eliminating the need for unnecessary, expensive evaluations. The bill also authorizes \$10 million for a center to provide information to students and families on college disability services and would fund training and resources for college faculty to support students with disabilities.
- The **Transformation to Competitive Employment Act (2019)** would authorize \$300 million in funds

for states and provider agencies to transform outdated models of services that are currently based on the payment of subminimum wages and would phase out issuance of 14c subminimum wage certificates after a multi-year period.

Postsecondary Education Program Alignment and Implementation Challenges

The above proposals signal a strong interest and impetus in adapting disability programs across the federal government to modern processes and best practice. While great progress has been made, and the above legislation is promising, there are still challenges at the federal, state, local, and institution of higher education (IHE) levels in aligning laws, regulations, policies, and programs and breaking through silos that impede progress. One of the most persistent impediments for some students with ID seeking to attend IPSE programs relates to a failure of alignment across three laws and the programs subsumed within them and their regulations: the HEOA, IDEA, and WIOA. The result has been the denial of funding and other supports for some students with ID seeking to attend postsecondary education programs.

The Inclusive Higher Education Committee (IHEC) is a diverse group of disability and education policy experts who formed a workgroup in 2006 with the express purpose of promoting improved opportunities for postsecondary education enrollment on the part of students with ID. The IHEC has attempted to provide guidance to Congress, the Administration, and professionals in the field as well as the public regarding the development and implementation of the provisions in HEOA as they pertain to these students. In a 2018 report entitled, “Addressing the Policy Tangle: Students with Intellectual Disability and the Path to Postsecondary Education, Employment, and Community Living” (Lee, Rozell & Will, 2018) the IHEC stated that:

“Despite language in the preamble of the IDEA 2004 regulations clarifying that IDEA funds may be used to support such students, and language in the WIOA regulatory preamble clarifying that vocational rehabilitation (VR) funds may be used to support students in these programs, subsequent guidance or interpretations of guidance are leading to the denial of services for some students.” Further, the IHEC recommended that the U.S. Department of Education issue new guidance and “clearly state that IDEA and VR funds may be used to support students with intellectual disability in postsecondary education settings (including dual enrollment, CTPs, and other IPSE programs).”

A letter to former Education Secretary DeVos on August 9, 2018 about this issue was signed by 70 organizations (Inclusive Higher Education Committee, 2018). Advocates also met with senior Department officials to urge new guidance clarifying that IDEA and WIOA funds may be used to support students with ID in postsecondary education. Subsequently, the Department issued guidance in September 2019 that “made clear that vocational rehabilitation (VR) and Individuals with Disabilities Education Act (IDEA) funds can be used to support dual enrollment, comprehensive transition, and other postsecondary education programs for students and youth with disabilities” (U.S. Department of Education, 2019b). In August 2020, the Department issued a revised transition guide that also addressed these issues. The 2019 and 2020 guidance both stated clearly that vocational rehabilitation agencies may provide funding and services to postsecondary students with ID (U.S. Department of Education, Office of Special Education and Rehabilitative Services, 2020). However, many programs are still having difficulty developing substantive partnerships with vocational rehabilitation (VR) agencies, although there has been progress. The language in the guidance and revised guidance concerning the use of IDEA funds is still confusing and conflicts with the IDEA 2004 regulatory preamble. Recommendations regarding these issues appear later in this report.

This example highlights challenges in aligning government policies. There are also challenges to the integration of postsecondary education programs into the sinews of the system of higher education. Inclusive postsecondary education (IPSE) programs must mesh existing IHE institutional rules and regulations with the newly created statute and regulations specific to programs for students with ID. Indeed, the leaders and staff of IPSE programs should be commended for their successful efforts to integrate students with ID

into institutions of higher education; they are undertaking the hard work of aligning the interest of students with significant disability with the policies and regulations, customs, and culture of IHEs while simultaneously initiating, growing, and sustaining inclusive postsecondary education programs.

Hannah Bourlakas

Graduate of Mason Life Program at George Mason University

“I liked living on my own and making friends and learning how to be independent. I went to college and went to sporting events, was a part of Best Buddies, took different classes, was on Student Government and had an internship on Capitol Hill all four years. Now I’m living in Washington, D.C. with support from Best Buddies Living and have a part-time job at Marshalls. From college, I learned how to take the Metro, how to cook new and healthy recipes, and make new friends.”



Impact of COVID-19

Given the extraordinary COVID-19 events in 2020 and 2021, it is important to examine the impact of the pandemic on students in higher education. College programs for students with ID are of course not immune to the significant impact of COVID-19 on higher education. Campus closures and exclusively on-line instruction became the norm overnight. The NCC responded to this crisis by offering bi-weekly staff support groups, by creating a dedicated page of resources (see <https://thinkcollege.net/think-college-news/resources-for-you-to-teach-learn-during-covid>) and establishing a Facebook group for college program staff to share strategies and resources that could be used to best support college students with ID as they transitioned into a fully virtually learning environment. Students with ID also rose to the occasion, learning the ins and outs of Zoom and adapting themselves to the new normal as they completed their Spring 2020 semester. Strategies to deal with issues that arose were implemented in the spring and have carried over to the 2020-2021 year since many IHEs continued distance or hybrid learning. A recent article in the Journal of Inclusive Postsecondary Education, authored by Dr. Clare Papay of Think College NCC and Dr. Beth Myers of Syracuse University, provides an excellent summary of the challenges of COVID-19, its impact on college students with ID, and creative ways programs addressed the challenges (Papay & Myers, 2020).

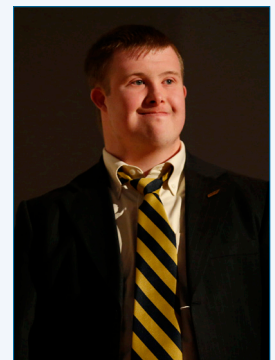
Progress and Looking to the Future

The challenges identified in this report are real and persistent. However, the progress that has been made on the path to education, employment, self-determination, and community living is also real, substantial and exciting. The finalization of the model program standards and the introduction of an accreditation process will be invaluable tools for inclusive postsecondary education programs as they continue to evolve and students continue to strive to obtain employment and community living.

Will McMillan

Graduate of Next Steps at Vanderbilt University

“I liked being on campus, being with friends, and getting my homework done. College helped me have higher expectations for myself. It also helped me share with others with disabilities about how important college is. I was living in my own apartment until the pandemic and I plan to return there when the pandemic ends. I’m doing virtual community classes to help learn skills. I work at The Arc of Tennessee and the Office of Nashville District Attorney Glenn Funk. I interned at that office when I was still at Next Steps. College helped me grow and excel in the classes I took. I made lifelong friendships with people truly believing that we all need to work together.”



BACKGROUND

Higher Education Act Provisions Impacting Students with ID

The 2008 Higher Education Opportunity Act (HEOA) amended the Higher Education Act and contained several provisions aimed at increasing access to higher education for youth and adults with intellectual disability (ID). These key provisions are:

Federal Student Aid: For the first time, students with ID are eligible to receive certain forms of federal student aid. (See details below.)

Model Programs: Transition and Postsecondary Education Programs for Students with Intellectual Disabilities (TPSIDs) were authorized to promote the successful transition of students with ID into higher education, and to enable institutes of higher education to create or expand high-quality inclusive model comprehensive transition and postsecondary programs for students with ID.

National Coordinating Center: A national coordinating center was established to provide technical assistance, provide coordination between and evaluation of TPSID projects, and create recommended standards for programs.

During the reauthorization in 2008, Congress gave careful consideration to the definition of “student with an intellectual disability,” which is defined for purposes of the Higher Education Act as follows:

The term “student with an intellectual disability” means a student—

- (A) with a cognitive impairment, characterized by significant limitations in—
 - (i) intellectual and cognitive functioning; and
 - (ii) adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and
- (B) who is currently, or was formerly, eligible for a free appropriate public education under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.]. (20 U.S.C. §1140 (2)).

Financial Aid and Program Definition

Students with ID are now eligible for federal financial aid (Pell Grants, Federal Supplemental Educational Opportunity Grants, and work-study jobs, but not loans) under certain conditions. The students must have exited high school, meet the definition of “intellectual disability” in HEOA, be enrolled or accepted for enrollment in a comprehensive transition and postsecondary (CTP) program for students with intellectual disability, and demonstrate financial need.

A CTP is defined in HEOA as follows:

- (1) Comprehensive transition and postsecondary program for students with intellectual disabilities

The term “comprehensive transition and postsecondary program for students with intellectual disabilities” means a degree, certificate, or nondegree program that meets each of the following:

- (A) Is offered by an institution of higher education.
- (B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.
- (C) Includes an advising and curriculum structure.
- (D) Requires students with intellectual disabilities to participate on not less than a half-time basis as determined by the institution, with such participation focusing on academic components, and occurring through 1 or more of the following activities:
 - (i) Regular enrollment in credit-bearing courses with nondisabled students offered by the institution.
 - (ii) Auditing or participating in courses with nondisabled students offered by the institution for which the student does not receive regular academic credit.
 - (iii) Enrollment in noncredit-bearing, nondegree courses with nondisabled students.
 - (iv) Participation in internships or work-based training in settings with nondisabled individuals.
- (E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible. (20 U.S.C. §1140 (1))

CTP programs support students with ID who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education to prepare for gainful employment. An eligible CTP program must meet the following requirements: physical attendance; academic, career, and independent living instruction; preparation for gainful employment; an advising and curriculum structure; and opportunities for students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible (20 U.S.C. 1091, 1140).

After HEOA 2008 was signed into law, the Department of Education conducted a Negotiated Rulemaking process, and published a Notice of Proposed Rulemaking Notice, as well as final regulations for Title IV of HEOA (34 CFR Parts 600, 601, 602, 668, 673, 674, 675, 682, 685, 686, 690, and 692; see www2.ed.gov/HEOA). The section on financial aid for students with ID provided further clarification on implementing this section of the law. For instance, the regulations specified how a student could be determined to meet the definition of a “student with an intellectual disability” if the student was not so identified under the Individuals with Disabilities Education Act (IDEA).

Although the law does not require an approval process for CTP programs, the Department initiated an approval process administered by the Office of Federal Student Aid (FSA) in the U.S. Department of Education (ED). The process to become an approved CTP program involves the following:

The IHE financial aid administrator completes an E-application (E-App) with input from a program representative. The program representative submits the following supporting documentation via e-mail:

- A detailed narrative description of how the CTP program meets all program eligibility requirements
- Satisfactory academic progress policy for CTP program students
- Letter to accrediting agency

In response to an inquiry from the Workgroup about the review and approval process, ED replied with the following information:

- After an institution submits an E-App with the details of the CTP program and the associated supporting documents, the ED School Participation Division (SPD) reviews the E-App and forwards the CTP supporting documents to the ED Performance Management Group to forward to the contractor to be reviewed by the field reviewers. If the field reviewers determine that the program meets the regulatory requirements for a CTP program under 34 C.F.R. 668, Subpart O, the SPD will finalize its review of the E-App and notify the institution of the final determination regarding the Title IV eligibility of the CTP program.
- The field reviewers are contractors with specialized expertise in CTP programs. Field reviewers are selected with backgrounds working in areas serving students with intellectual disabilities. The first field reviewers were from a list of names provided by the Department as reviewers who would have the necessary experience to evaluate the applications and provide a recommendation regarding the eligibility of the programs. These reviewers had specialized experience working with relevant fields such as special education and disability policy and vocational rehabilitation, and came from backgrounds including two and four year institutions, local education agencies, and state entities. Field reviewers are selected and trained by the contractor.
- Schools will be notified of the CTP program’s approval upon completion of review of the E-App via the Approval Letter and the schools Eligibility and Certification Approval Report.

The current process is aimed at determining whether programs are addressing regulatory requirements, and is not intended to evaluate quality, as accreditation will do. Institutions may reapply if they are not initially approved. Once approved, there are no requirements for programs to be reapproved and there is no continued oversight related to approved programs continuing to meet CTP program requirements.

The Office of Federal Student Aid website includes information on financial aid for students with ID and a list of approved programs; see <https://studentaid.gov/understand-aid/eligibility/requirements/intellectual-disabilities>.

FIGURE 3: TPSID 2015-2020 GRANTEEES



Most recently, in October 2020, the Department again awarded \$9.8 million in funding to a third cohort of 22 TPSID grantees, currently (May 2021) with 29 sites in 16 states. Some programs were funded in more than one cohort; see Figure 4.

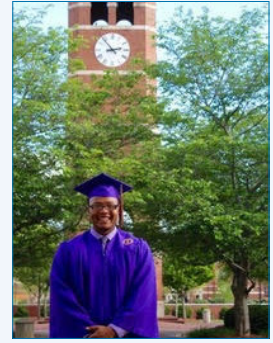
FIGURE 4 TPSID 2020-2025 GRANTEEES



Cody Thompson

Graduate of UP at Western Carolina University

“At college I really enjoyed my classes and being independent. It was great being on a college campus and getting to explore different career paths. The inclusive experience at college changed my life by helping me take on new responsibilities, learn to communicate with people, and gain new skills. I am now living independently with a roommate and working full time with benefits in landscaping at B.H. Graning. College helped me know I could be independent and have the skills to live on my own. Also, go Cats!”



The Institute for Community Inclusion at the University of Massachusetts Boston was awarded funding to serve as the National Coordinating Center during all three TPSID cohorts (2010, 2015, and 2020).

See Appendix C for a list of all TPSID grantees from October 2010 through 2020.

Requirements for the Accreditation Workgroup

The HEOA requires the National Coordinating Center (NCC) to convene a workgroup to develop and recommend model criteria, standards, and components for higher education programs for students with ID.

Requirements for Accreditation Workgroup from HEOA (20 U.S.C. §1140q(b)(5)):

- J) convene a workgroup to develop and recommend model criteria, standards, and components of such programs as described in subparagraph (E), that are appropriate for the development of accreditation standards, which workgroup shall include—
 - (i) an expert in higher education;
 - (ii) an expert in special education;
 - (iii) a disability organization that represents students with intellectual disabilities;
 - (iv) a representative from the National Advisory Committee on Institutional Quality and Integrity; and
 - (v) a representative of a regional or national accreditation agency or association.

Note that the “necessary components of such programs” are described in (E) below:

- (E) develop recommendations for the necessary components of such programs, such as—
 - (i) academic, vocational, social, and independent living skills;
 - (ii) evaluation of student progress;
 - (iii) program administration and evaluation;
 - (iv) student eligibility; and
 - (v) issues regarding the equivalency of a student’s participation in such programs to semester, trimester, quarter, credit, or clock hours at an institution of higher education, as the case may be;
- (6) REPORT.—Not later than five years after the date of the establishment of the coordinating center under this subsection, the coordinating center shall report to the Secretary, the authorizing committees, and the National Advisory Committee on Institutional Quality and Integrity on the recommendations of the workgroup described in paragraph (5)(J).

National Coordinating Center Evaluation and Outcomes for Students

One of the responsibilities of the National Coordinating Center is to provide technical assistance to and evaluation of the TPSID projects. An Office of Management and Budget (OMB)-approved data collection tool was developed by the National Coordinating Center and is used annually by TPSIDs to gather and report data on programs and students. Evaluation data from the TPSID programs has informed the work of the Workgroup. Annual reports of evaluation data from both the 2010–2015 and the 2015–2020 cohorts may be found on the Think College website; see <https://tinyurl.com/NCCAnnualreports>.

The data collected from the second cohort of TPSID grantees (2015–2020) by the National Coordinating Center reflect:

- 2,122 students attended programs at 64 campuses implementing 27 model demonstration grants
- Students enrolled in over 15,000 inclusive courses
- Overall, 55% of all course enrollments across the 5 years of data collection were in inclusive classes
- 1,108 students worked in a paid job while also attending their college program
- Over 1,000 students earned a credential upon exiting

Across the five years of the 2015–2020 TPSID grants, positive trends have emerged (Grigal et al., 2021). The percentage of inclusive classes taken by students with ID has increased from 44% of all course enrollments in FY2015 to 62% in FY2020, indicating that TPSID programs are providing greater access to typical college classes over time.

A number of favorable exit outcomes have also been found. For example, the percentage of students who earned a credential at exit increased from 70% in FY2015 to 77% in FY2020. The percentage of students who were engaged in employment, career development, or further postsecondary education within 90 days of program exit has remained above 70% for all 5 years of the 2015–2020 TPSID grants. The percentage of students with a paid job within 90 days of exit rose to 52% in FY2019 before declining to 21% in FY2020 (likely due to the impact of COVID-19).

Amanda Myers

**Graduate of TigerLIFE Program at University of Memphis Institute on Disability
Valedictorian of TigerLIFE Class of May 2020**

Amanda's desire was to work in the Pastries Department at Cheesecake Factory. Her opportunities with The Cheesecake Factory as a salad and pastry prep maker gave her the skills to succeed in her desired field and she currently works at The Cheesecake Factory.

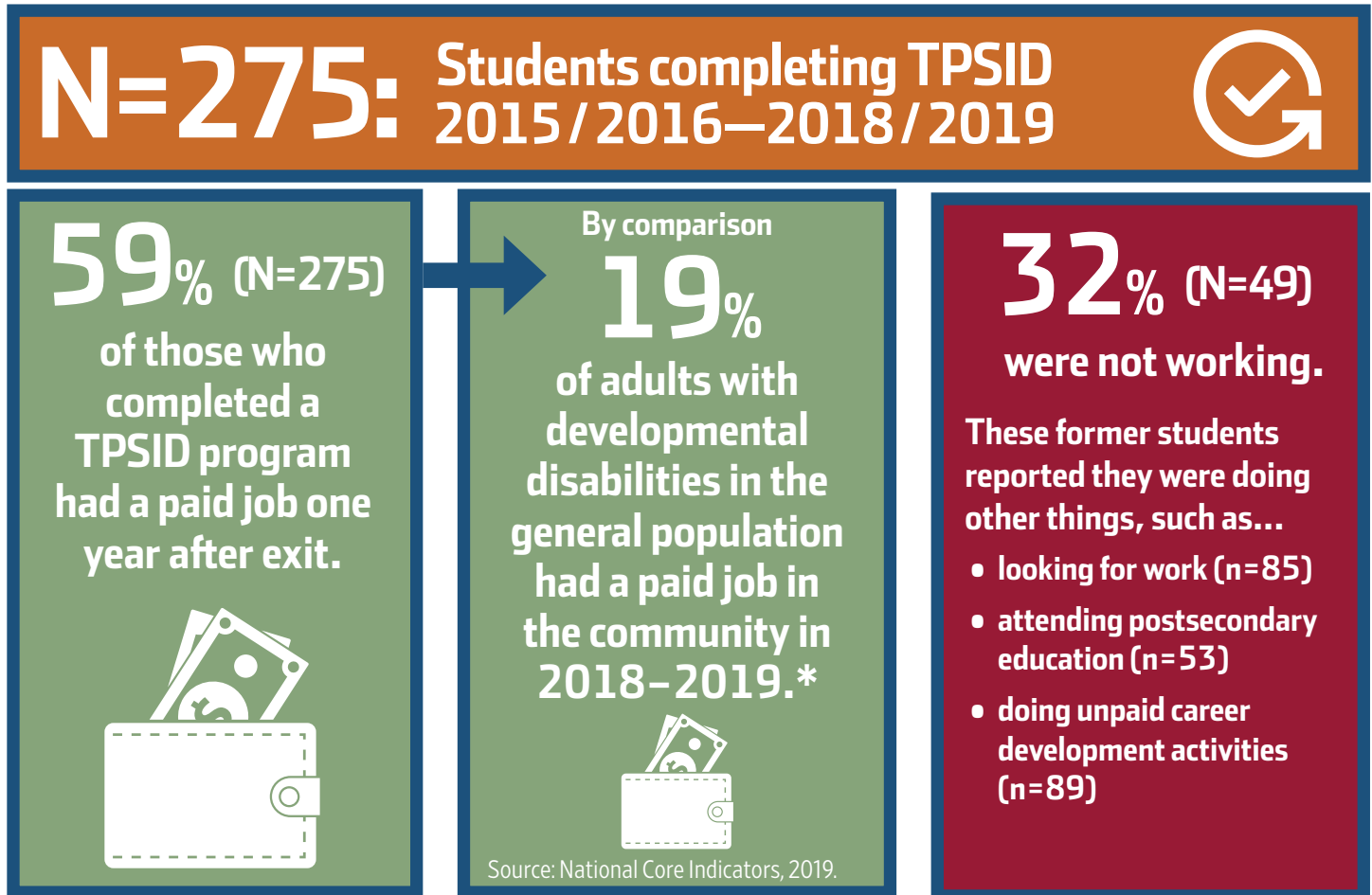
"The thing I liked best about TigerLife was learning new things in the classroom. College has made me more independent and taught me job skills. College has helped me find a job and helped me feel more confident in the workplace. This is my experience with TigerLife."



Across the five years of the 2015–2020 TPSID grants, positive trends have emerged (Grigal et al., 2021). The percentage of inclusive classes taken by students with ID has increased from 44% of all course enrollments in FY2015 to 62% in FY2020, indicating that TPSID programs are providing greater access to typical college classes over time.

As shown in Figure 5, the findings related to the employment of students with ID during and after participating in higher education are particularly promising, with 59% of respondents to a 1-year outcome survey had a paid job one year after completing a TPSID program, and 66% of respondents had a paid job two years after completing a TPSID program (Grigal, et al., 2021).

FIGURE 5: EMPLOYMENT OUTCOME FINDINGS



* 2018-19 is the most recent year for which data are available.

Indeed, the leaders and staff of IPSE programs should be commended for their successful efforts to integrate students with ID into institutions of higher education; they are undertaking the hard work of aligning the interest of students with significant disability with the policies and regulations, customs, and culture of IHEs while simultaneously initiating, growing, and sustaining inclusive postsecondary education programs.

NATIONAL COORDINATING CENTER ACCREDITATION WORKGROUP

First Accreditation Workgroup and Report to Congress

The first National Coordinating Center Accreditation Workgroup was established in 2011 and completed its work in 2016. That Workgroup consulted with experts, developed draft model accreditation standards and compared them to federal law and regulations, obtained public input, and created model program accreditation standards for higher education programs for students with ID. Model standards were developed in each area outlined in the federal regulations for the development of accreditation standards (20 U.S.C. §1140q(b)(5)). These regulations were updated with a final rule taking effect July 1, 2020 (U.S. Department of Education, 2019).

The model accreditation standards developed by this Workgroup represented five years of analysis, public input, and effort by the Workgroup. The Workgroup's [Report on Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: A Path to Education, Employment, and Community Living](#) (National Coordinating Center Accreditation Workgroup, 2016) was sent in 2016 to the Secretary of Education, relevant Congressional committees, and presented to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) as required by law, and distributed widely to interested parties.

A listing of specific steps taken by the first Workgroup include the following:

- Consulted with experts to better understand the accreditation process
- Analyzed the relationship of model standards to existing law and regulations
- Credential committee work included:
 - » Surveyed TPSID program directors about credentialing
 - » Reviewed policies and practices
 - » Developed resources on credentials
- Created draft accreditation standards
- Obtained public input through presentations of draft standards and input sessions at conferences, via webinars, and through an online survey, with over 900 individuals providing input
- Finalized standards based on public feedback and consultation with experts
- Prepared and widely distributed the report

2016–2020 Accreditation Workgroup Actions

The second Accreditation Workgroup (2016–2020) included experts in the areas required by the HEOA and other members reflecting a broad range of expertise. See the “Workgroup Members” section of this report for more details about Workgroup members.

One of the HEOA requirements is to disseminate the report to the Secretary of Education, the relevant Congressional committees, and the National Advisory Committee on Institutional Quality and Integrity (NACIQI). The 2016 report, *Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: A Path to Education, Employment and Community Living*, was broadly disseminated, and the Chair and several members of the Workgroup met with senior Republican and Democratic Congressional staff of the relevant Senate and House committees and with senior leadership in the US Department of Education Office of Postsecondary Education and the Office of Special Education and Rehabilitative Services to discuss it. The Chair, Stephanie Smith Lee, and Dr. Meg Grigal, Principal Investigator of the NCC, also presented the report at a meeting of NACIQI.

Additionally, dissemination of the report occurred through presentations at a variety of conferences, including the TPSID Project Directors in-person and virtual meetings, State of the Art Conference on

Postsecondary Education and Students with Intellectual Disability, the National Down Syndrome Congress convention, the All Born (In) conference, and meetings with the Collaboration to Promote Self-Determination and other organizations.

At the in-person meeting of the Workgroup on March 28, 2017, in Washington DC, experts from the U.S. Department of Education, NACIQI, and the Council for Higher Education Accreditation (CHEA) presented. The Workgroup began planning the field-testing of the model standards, next steps for the Workgroup, and developed three committees:

- Student Assessment and Learning Outcomes Committee
- Self-Study Committee
- Accreditation Outreach Committee

One of the first responsibilities of the committees was to develop plans and discussion questions for focus groups to be held at the July 18, 2017 TPSID Project Directors Meeting. The purpose was to learn more about the current state in each area and any questions, concerns, and suggestions projects may have.

Much of the work over the subsequent years centered on these topics, with the committees playing an important role in research, outreach, proposing plans, and developing options for Workgroup consideration. The committees were chaired by Workgroup members and included both Workgroup members and other experts. The committees met independently and reported back to the full Workgroup for final decisions on their recommendations. The following section provides a description of each committees' members and activities.

Elizabeth "Liz" Romanick

**Junior, Advancing Students Toward Education and Employment Program (ASTEP)
at Minot State University**

"When I started at Minot State University, I didn't realize how different college life is from living at home. When I keep up with homework, making sure that I am keeping track of my classes and study times, as well as employment, then I really like college. There are so many clubs to join and student life activities. It means a lot to be able to go to college, get involved, and live on my own."



Student Assessment and Learning Outcomes Committee

Committee members:

- Rachel Quenemoen, Chair
- Deborah J. Amsden Micklos
- Carol Britton-Laws
- Heidi Graff
- Denise Rozell
- Jenni Sandler
- Terri Shelton
- Madeleine Will

When the Accreditation Workgroup report was presented to NACIQI, several of their members suggested that the workgroup should consider adding one or more model standards related to student learning outcomes (SLOs). A 2019 Council for Higher Education Accreditation research report, "Accreditation and Student Learning Outcomes: Perspectives from Accrediting Organizations", highlights the increased national focus on student learning outcomes and steps that accreditors are taking to ensure SLOs are a meaningful part of accreditation (Council for Higher Education Accreditation, 2019).

Therefore, one of the key charges for this committee was the development of a draft model standard that

considers student achievement from a measurement perspective to make sure that every program has a mechanism and a measurement process in place.

The focus group at the TPSID meeting primarily considered two questions in order to discover the current status of defining student outcomes and measuring them.

- How does your program identify what each student is expected to learn in academics, independent living, career preparation, and social/campus engagement?
- How do you assess that the Student Learning Outcomes are being met?

It was clear from the focus group that there was a wide range of understanding and practices, with SLOs typically considered at just an individual level, and not at the broader program level. Moreover, rudimentary assessment seemed to focus on attendance, homework being done, etc., not on actual learning, and limited assessment was reported related to non-academics such as progress in social competence, independent living skills, career development, etc. This feedback from the focus group led to further work by the committee to understand from current programs how they go about their work, where they are currently struggling, what new programs might need, and what established programs have learned.

The committee:

- Reviewed extant data and literature on student learning outcomes and credentials, and current practices.
- Reviewed the Model Accreditation Standards for gaps or omissions related to student learning outcomes and credentials.
- Identified similar approaches to learning outcomes or credentials in related programs.
- Held a webinar on October 19, 2017, for the Workgroup that detailed case studies on current practices at three institutions regarding student assessment and outcomes.
- Considered issues involving student learning assessment and outcomes at the individual and program level, broader program outcomes, and program evaluation and continuous improvement.
- Drafted two standards that were considered by the Workgroup, shared widely for input, revised, and adopted. Resulting changes included:
 - » New Student Achievement Standard 2 on program level Student Learning Outcomes.
 - » New Student Achievement Standard 3 on individualized learning plans for each student participating in a college catalog class.
- The work of this committee also informed revisions to other standards, including:
 - » Updated Student Achievement Standard 4 to require written reports indicating student progress in the areas of academics, socialization, independent living, and career/employment.
 - » Updated Faculty and Staff Standard 7 to include information and support provided to faculty and staff about the impact of an individual student's disability on learning, and strategies to support, instruct and assess the student.

Accreditation Outreach Committee

Committee Members:

- Chrisann Schiro-Geist, Chair
- Roberta (Bobbie) Derlin
- Jon Fansmith
- Elise McMillan

This committee conducted outreach to accrediting agencies to determine if an existing agency would be appropriate to and interested in using the model standards, reviewed other program standards, surveyed current programs regarding their interest in becoming accredited, attempted to identify someone from an accrediting agency to serve on the Workgroup, and researched the cost of establishing a new agency.

Outreach to accrediting agencies:

- Created a list to “match up” institutions that have inclusive postsecondary education (IPSE) programs with regional accreditors to identify possible agencies to contact regarding accrediting IPSE programs.
- Contacts were made with the Council of Regional Accreditors, Council for Higher Education Accreditation (CHEA), and certain accrediting agencies to ascertain interest in a representative serving on the Workgroup and possible accreditors to approach regarding accrediting IPSE programs.
- When outreach to regional accreditors did not result in identifying a possible accreditor, research on and outreach to program accreditors was undertaken.
- Further discussions with CHEA to seek advice and help identify possible specialized (program) accreditors.
- Researched the costs to become accredited and retain accreditation at four CHEA-recognized agencies in order to estimate the cost of developing an accrediting agency.
- Held discussions with several program accreditors regarding the possibility of using the model standards and accrediting IPSE programs. However, none worked out.

Accreditation Interest Survey:

- Requests to participate in the accreditation survey were sent out to 247 valid email addresses for the program directors associated with IPSE programs within the NCC database.
- Overall, 120 responses were collected from various programs across the United States, 102 of which completed the full survey. This yielded a 41.3% completion rate.
- The survey results indicated a strong interest in accreditation. Of the 107 programs that responded to questions about participating in accreditation, 82% reported that, if an accrediting body for postsecondary education programs for students with ID were created, they would be “highly likely” or “likely” to participate in the accreditation process.
- 66.4% of respondents (or n = 71) found the idea of accreditation either “extremely” or “very” important. This interest is important to the success of program accreditation for these programs.

Researched costs of creating a new accrediting agency:

Since no interested accreditors were identified, the committee explored the feasibility of creating a new accrediting agency. This included researching and reporting on the potential costs involved in developing an accrediting organization as described below.

- Based on the committee research, the total annual cost is anticipated to be a minimum of \$200,000 per year. Most of the cost would be personnel, with the costs estimated as follows:
 - » Executive Director: \$75,000, half-time clerical staff: \$15,000 plus benefits for both, at 32% of their salaries for a total of \$28,800 in benefit costs.
 - » Cost of office and equipment: \$12,000
 - » Cost of Annual meeting of the Accreditation Body: \$20,000
 - » Cost of CHEA affiliation and travel to CHEA and other travel to meetings: \$10,000
 - » IT costs, including website, maintenance, data entry, webinars, etc.: \$10,000
 - » Cost of materials, brochures, services: \$4,200
 - » Miscellaneous costs, including overhead to the hosting organization: \$35,000
- This is a very modest estimate and costs could go up, depending on the location of the office, whether or not the office is virtual, etc.
- Eighty programs indicated in their survey responses they would participate in accreditation if it were available. Once established, the costs could be covered with a modest annual accreditation fee of about \$2,500 per year. That is well below the fees charged by many other accrediting bodies.
- A key factor CHEA considers in recognizing accrediting agencies is sustainability. If the costs could be covered by a grant for the first 5 years, the accreditation body would be totally self-sufficient by the end of a grant.

Given that no existing accrediting organization could be identified to accredit IPSE programs (despite extensive effort), along with the strong interest in accreditation expressed by IPSE programs in the survey, and the relatively reasonable start up costs, the Workgroup recommends the following:

Recommendation to Congress: Fund the creation of a new accrediting agency to accredit comprehensive transition and postsecondary programs.

Recommendation to Next Workgroup: Identify the requirements to develop a new accrediting agency and to obtain recognition by CHEA.

Format for standards and retention measures:

This committee also analyzed, researched, and reported on outcome measures, such as retention, and formats for standards.

- After reviewing the format for a number of other program standards, and based on the Workgroup desire to include more detailed information regarding evidence, the committee recommended, and the Workgroup agreed, to include “requirements for review” for each standard, along with guidance.
- Given the increased focus on outcomes and retention at the national level as outlined in the above-mentioned 2019 CHEA report, and discussions with CHEA, the committee recommended, and the Workgroup agreed, to include new retention and student achievement measures in two standards and new retention of records requirements:
 - » Student Achievement Standard 5 on student pace of completion and retention rates.
 - » Faculty and Staff Standard 4 on retention of program management and leadership.
 - » Retention of records requirements in several standards.

Recommendation to Next Workgroup: Identify what period of time should be considered reasonable to retain various types of records.

Self-Study Committee

Committee members:

- Stephan Smith, Chair
- Wilbert Francis
- David Michael Mank
- Susanna Miller Raines
- Thomas Neuville
- Tracy Rand
- Amy Schuler
- Maurice (Moe) Williams

A major focus of the 2016–2020 Workgroup was to conduct a field test of the model standards, analyze the results, and revise the model standards, if needed, based on the field test. This committee developed proposed plans and protocols for the field test, including the following.

- Developed a proposed protocol for conducting the field test as a self-study by a diversity of programs, with specific diversity recommendations for site selection.
- Created a questionnaire addressing each of the standard areas with two base questions for each standard, with additional questions as needed.
- Recommended a process and timeline for undertaking and analyzing the survey results.

The following section describes the process and protocol used by the Workgroup in conducting, analyzing, and utilizing the results of the field test, based on recommendations from this committee

Field Test Implementation

Based on criteria and a protocol created by the Workgroup's Self-Study Committee and refined by the full Workgroup, nine college programs were recruited to complete the survey in Survey Gizmo. The programs were instructed to consider whether their institution met each standard and to provide evidence of how the standard was met. In addition, each institution was asked to comment on the process, the standard, and guidance. Self-study participants were informed that this was not a formal accreditation process, results and comments from individual programs would not be identifiable, and if a section turned out to be too time-consuming or difficult, to move on to the next section.

Field Test Survey Process

The selection of colleges, universities, and community colleges invited to participate represented a broad and diverse group of institutions and programs:

- Public and private IHEs from across the country
- Small, medium, and large student populations (4,000–25,000 with an average of 12,000)
- Adult and college-based transition programs with dually enrolled students
- Urban, suburban, rural, and commuter environments
- Full range of program lengths including 2-year, 4-year, and variable
- Residential and non-residential campuses
- TPSID grantees and non-TPSID grantees
- IHEs approved as CTPs; IHEs not CTP approved

Participating Institutions

The following IHEs participated in the field test survey:

- Vanderbilt University
- Pennsylvania State University/Harrisburg
- College of Charleston
- George Mason University
- University of Nevada, Las Vegas
- Millersville University
- University of Northern Colorado
- Massasoit Community College
- Mercer County Community College

The instructions for the survey may be found in Appendix B.

Field Test Analysis and Results

A review team was established including both Workgroup members and NCC staff. The review team individually reviewed all survey responses and materials. The Team then met in person for three days to examine each survey response and evidence provided and to start developing recommendations for revising the standards and guidelines based on the responses. The Team then held individual debrief calls with each program to discuss its experience with the survey and the process, based on a format and protocol developed by the Workgroup's Self-Study Committee and approved by the Workgroup. Of critical importance was the need to determine whether there was confusion about the standards, a need to clarify any standards, and any recommendations for fine-tuning the standards or developing new standards or guidance.

At this point, a document was created that included information from the field test and other public input, and review team recommendations for revisions to the model standards and guidance. It was used as the basis for consideration of updating the standards at an all-day in-person meeting of the Workgroup on September 11, 2019, and several follow-up meetings.

Key Findings from the Field Test

It is clear that the IPSE programs participating in the field test process took it very seriously and put in substantial effort to assist the Workgroup with improving the standards. It is also clear there was confusion about some of the model standards and guidance. In addition to the big picture items described in the following section, the following technical issues were ascertained from the field test:

- Some of the standards were not completely clear to participants.
- Some terms needed to be better defined and made measurable (i.e., use of the quantifier “periodically” is vague).
- A narrative about each program completing the process should be required along with other formatting changes.
- When a standard includes multiple parts, then there should be specific questions and responses for each part.
- There was wide variation in IPSE program policies and practices.

Public Input on Standards

In addition to the survey responses, other public input has been sought in a variety of settings and formats. Workgroup members and NCC staff have participated in formal presentations and input sessions at various conferences and meetings, including State of the Art conferences, National Down Syndrome Congress conventions, TPSID Project Director meetings, All Born (in) conferences, and other events. In addition, an informal poll of TPSID project directors and family organizations regarding emerging issues in the field resulted in information related to the standards and guidance. Program staff and families also provided input directly to the Workgroup Chair and members and to NCC staff via comments at meetings, calls, and emails.

Lessons Learned, Emerging Issues, Standards Revisions, and Recommendations

Significant progress has been made since the first Workgroup report, and challenges and emerging issues have also become evident as the field of IPSE grows and evolves. Much instructive information was gleaned from the field test survey and the debrief calls as well as from securing public input regarding the standards and guidance. Very useful information was also elicited concerning the larger education and societal issues in which the college programs exist and attempt to function.

In framing consideration of revising the standards, the Accreditation Workgroup kept in mind that postsecondary education for students with ID is still a growing field. Twenty years ago, families were knocking on college doors and students often slipped in through the figurative back door, with new programs often trying to escape notice within the institution. Ten years ago, Think College was funded as the National Coordinating Center and TPSID model programs started being funded. Huge progress has been made in a short time. We are now addressing “next generation” issues.

This section includes an analysis of lessons learned on key topics, input from the field test and the public, and new challenges and implementation issues that have emerged as the field continues to evolve and grow. This section also includes a summary of the revisions to the standards based on this information and analysis, and related recommendations to Congress, the Department of Education, the National Coordinating Center (NCC), and the next Workgroup.

Enrolling, Supporting, and Retaining Students with ID

While IPSE programs have created exciting new opportunities and positive outcomes for thousands of students with intellectual disability (ID), there remains confusion and misinformation about the HEOA definition of intellectual disability and intent of the law to serve students with ID. Misinformation on the definition of ID provided by the U.S. Department of Education (ED) to TPSID applicants and posted on the ED website has contributed to this confusion. Concerns have also been raised that ED has approved some programs for CTP status that do not serve students with ID, among other challenges with the CTP approval process.

Justin Mejias

Graduate of Destination Dawgs at University of Georgia, Class of 2019

“Going to college changed my life because I learned that I can do more than I thought I could. I worked for Athens Clarke County Leisure Services as an inclusion aide. Going to college was how I found out about my job as well as being able to have the opportunity to do an interview in front of a video camera and have the opportunity to be a music therapy assistant as well as giving a speech at graduation. I am so thankful for the opportunities I had while at UGA, and now I am using all the lessons that I learned while in the Destination Dawgs Program to be able to help other people with disabilities.”



Some students who do not have ID are seeking enrollment and being admitted to college programs for students with ID. This reality is partly due to the fact that campus disability services offices are understaffed and underfunded and that some students who require more supports to attend college are willing to attend a program for students with ID in order to get those supports. This pressure to admit students who do not have ID, or only students who are impacted minimally by ID, along with rigid admissions requirements in some programs, is causing serious concern among the students for whom these programs were intended, who now sometimes cannot gain entrance, and their families. A related concern expressed by families is that in order for students to be successful and retained in the programs, more and individualized supports are needed in academics, career/employment activities, and in gaining social and independent living skills, such as meaningfully engaging with others, scheduling and maintaining a calendar, managing extensive incoming emails/texts, living in dormitories, and navigating the campus and community. Some students with ID have been suspended, pressured to leave, and even expelled under questionable circumstances, provoking strong parental response about lack of accountability for these students.

A lack of sufficient individualized support and limited knowledge of the characteristics of students with ID and support needs of individual students are contributing factors in some programs. Some IPSE program staff lack awareness and understanding of youth with particular disabilities, such as Down syndrome, and have not yet developed the ability to support these students. Improved and increased professional development will help program staff better understand how to educate and retain students with ID. For example, the Adult Down Syndrome Center has a significant number of helpful resources, including the book *Mental Wellness in Adults with Down Syndrome: A Guide to Emotional and Behavioral Strengths and Challenges* (McGuire and Chicoine, Second Edition, 2021). While these resources are geared towards individuals with Down syndrome, much of the information and suggested strategies are relevant to others with ID.

Standards:

- Mission Standard 1 retains the requirement for a written mission statement that “is consistent with the Higher Education Act (HEA) requirements that the program is a “degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID).”
- Student Services Standard 1 requires that “admission policies and practices ensure that all students who are admitted meet the definition of ‘a student with an intellectual disability’ in the HEA law and regulations.”
- Student Achievement Standards 1, 2, and 3 and Curriculum Standards 2, 6, and 7 have been updated to ensure that individualized planning and supports are available in the areas of academics, career/employment, social competencies, and independent living.
- Faculty and Staff Standards 3, 5, 6, and 7 have been updated to address professional development and training and supervision of those who work with students.
- Student Services Standard 2 ensures that students receive ongoing advice, counseling, and support in all aspects of their program and postsecondary experiences, including support for students who live in dormitories or other residential life settings.

Recommendations to the Department of Education:

- Correct the misinformation provided to TPSID applicants and on the Department website regarding the definition of ID. The definition needs to be in accordance with the ID definition in the Higher Education Act (HEA) law and regulations (that state how to document an ID if the student is not identified as having an ID in K–12 education).
- Review the selection of and training provided to CTP peer reviewers to ensure that there is a clear understanding and application of the definition of ID and other provisions in the law and regulations.

Recommendations to the NCC:

- Continue to prioritize ongoing technical assistance to increase understanding of and adherence to the statutory definition by CTPs and TPSIDs and the regulatory requirements.

Recommendations to Congress:

Students with disabilities often must go to great expense and trouble to obtain a re-evaluation prior to enrolling in college to prove that they have a disability. Many students with disabilities struggle to receive needed accommodations, that are required under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act from under-funded and under-staffed disability services offices. Depending on the individual student and the documentation they provide, such accommodations might include extra time on tests, a note taker, sign language interpreter, etc. Some students with disabilities struggle and drop out when IHEs providing some additional services beyond the minimum required by ADA and 504 would allow the students to be successful. As indicated above, the need for such support also sometimes drives students who do not have ID, and who should be working towards a traditional degree, to enroll in IPSE programs. The following recommendations would benefit all students with disabilities.

- Allow students with all disabilities to submit their Individualized Education Programs (IEPs), 504 plans or prior evaluation as documentation of their disability to obtain accommodations in college, so the students do not need to go to the expense and trouble of obtaining a new evaluation prior to attending a college or university. (See the RISE Act.)
- Fund technical assistance to provide students with all disabilities and their families information on college disability services and how to access them and to provide college faculty training and resources on best practices to support students with disabilities. (See the RISE Act.)
- Fund pilot programs for disability service offices to provide services for students with all disabilities beyond the minimum accommodations required by the ADA and Section 504 of the Rehabilitation Act.

Increased Focus on Person-Centered Planning, Student Learning Outcomes, & Individualized Supports

In a still emerging field, a wide variation in practices is to be expected. While some IPSE programs utilize person-centered planning, many programs are not based on rigorous person-centered planning and do not identify or provide individualized supports and services in academics, socialization, independent living, and career/employment. While the original standards referenced person-centered plans (PCP), it became apparent that a specific PCP standard was needed. It is imperative that programs conceptualize and develop individualized person-centered plans—based on the student’s interests, goals and vision for his or her future—that are the basis for addressing what the student is expected to learn in specific areas and how the student will be supported and assessed. PCPs need to be student-focused and updated regularly. The PCP must include a description of “what works” for the student, including learning strategies, accommodations, and individualized supports and services.

Equally apparent and important was the necessity to develop a standard on program-level student learning outcomes (SLOs) that requires programs to address the SLOs for all students in the program. The section above on the Student Assessment and Learning Outcomes Committee describes the need for an SLO standard and the work of the committee to develop recommendations for this new standard, a new standard requiring student learning plans when students attend catalog classes, a new standard on information for faculty regarding support needed by individual students, and a requirement to consider SLOs as part of program evaluation.

Standards:

- A new Curriculum Standard 2 requires the program to utilize and document a person-centered planning approach.
- A new Student Achievement Standard 2 requires programs to establish program-level student learning outcomes.
- A new Student Achievement Standard 3 requires individualized learning plans for students attending catalog courses that identifies what the student is expected to learn; how the student will be evaluated; and supports, strategies, and needed accommodations or modifications.
- The revised Program Development, Planning, and Review Standard 1 requires student learning outcomes and program outcomes to be considered as part of program evaluation and continuous quality improvement.
- A new Faculty and Staff Standard 7 addresses providing information and support to faculty about the impact of a student's disability on learning and strategies to support, instruct, and assess the student.

Recommendation to Department of Education:

Fund the development and dissemination of resources and strategies to use in determining what an individual student with ID is expected to learn, and how to assess progress in traditional classes, based on best practice. Such resources and strategies are needed to determine student progress in all areas (academic, career or technical, and independent living).

Recommendation to NCC:

Develop recommendations about the various types of academic and non-academic advising and counseling important to students and options for how such advising and counseling should be provided and by whom.

Inclusion in Classes, Employment, and the College Community, and Program Expansion

As previously mentioned, and important to underscore: the leaders and staff of IPSE programs should be commended for their efforts to integrate students with ID into institutions of higher education. They are undertaking the hard work of aligning the interest of students with significant disability with the policies and regulations, customs and culture of IHEs while simultaneously initiating, growing, and sustaining inclusive postsecondary education programs. But the challenges are real and persistent. College programs indicate they continue to grapple with the lack of acceptance and support for both their students and their programs. While great progress has been made in expanding the number of programs to over 300, data indicate that only 6% of U.S. institutions of higher education have a program for students with ID, suggesting the necessity of creating new and geographically diverse programs with a range of options.

Concerns have been raised that some college programs that have received CTP approval by ED are not adhering to the statutory requirement that at least 50% of students' time be spent in inclusive courses or employment settings, and some programs provide only a very limited selection of catalog courses. A corollary concern raised frequently by IPSE programs and students is that both the programs and the students should have access to all services and facilities, including residential and campus activities, and that this access should represent authentic inclusion.

Standards:

- The guidance for Curriculum Standard 1 has been expanded with more detailed information about the Higher Education Act (HEA) inclusion requirements and requirements for an inclusive program of study.
- Curriculum Standard 3 requires that students participate in a broad array of courses.
- Facility, Equipment, and Supply Standard 1 and Student Services Standard 3 address student access to facilities and services.

Recommendations to Department of Education:

- Fund research on the impact of student status on access to and participation in services and social and recreational activities, and how the issue of student status may affect the development of the accreditation process and best-practice guidelines.

As described in the previous section on TPSIDs, the Higher Education Act (HEA) requires the Secretary of Education to provide for an equitable geographic distribution of TPSID grants and serve areas that are underserved by this type of program. It is not apparent that this has been done in the three cohorts of TPSID grants awarded thus far.

- Develop a method to create an equitable geographic distribution and to serve underserved areas for future TPSID grants, as required by the HEA.

Increasing and Improving Residential Options

Progress has been made over the past ten to twenty years in the availability of campus housing for students with ID. This is a critically important development for students with ID. Housing, whether in dormitory rooms or suites or in nearby apartments or houses, offers the following benefits:

- Independent living skills may be taught and supported in a natural environment.
- Students gain independence in decision-making, time management, self-care, self-determination and other important aspects.
- Students may become part of a living/learning community and more engaged in campus life.
- It provides an important interim step from living at home with families to living more independently in the community.
- It provides a way for students who do not live close to campus to enroll in the program.

At the current time (April 2021), there are 114 college programs for students with ID that offer housing to students in their programs out of a total of 308 programs (or 38% of all programs offered housing). Data show that the percentage of college programs with housing options has remained at around 30–35% for several years. However, the number of residential options has been increasing, with 26 new residential programs made available between August 1, 2018, and January 2021 (Grigal, et al., 2021).

The TPSID model demonstration provisions in HEA attempt to increase the number of residential college programs available by making inclusion of a residential component a competitive priority for those applying for TPSID grant funding. In an analysis of data related to residential options being offered by TPSID-funded programs, we see a modest increase in the number of TPSIDs offering a residential option in the first cohort of TPSIDs (2010–2015) with 11 providing housing in the first year of funding to a high of 16 programs offering housing four years later. In the second cohort of TPSIDs (2015–2020), 11 TPSID sites added a residential component during their funding period, with 19 offering housing at initial funding, and 30 with a housing component four years later.

However, ED did not include the student housing or the other two competitive preferences required in the Higher Education Act (HEA) in the 2020 TPSID Request for Proposals. This is unfortunate, particularly given the importance of offering residential life opportunities to students with ID.

Students, families, and programs have expressed concerns about the need to increase the availability of residential life opportunities. It is sometimes difficult to obtain housing opportunities for reasons such as:

- No, or limited, housing exists for any students at an IHE.
- A lack of understanding about students with ID and unfounded concerns about risks or legal liabilities.
- Reluctance on the part of the housing office and/or IHE to allow housing for non-degree students.

Many programs have had success with creative off-campus housing, supported by the program, and at times in partnership with nonprofit organizations or agencies providing support. Others have had to work hard at developing relationships with various IHE offices to address concerns.

Families have expressed concerns that some students do not receive adequate, or sometimes any, support in residential settings. There have also been concerns expressed about a need for coordination when students receive support from an outside agency or organization, whether for residential or other supports. The NCC has developed helpful resources on housing supports; see <https://tinyurl.com/NCChousing>.

Standards:

- Various standards emphasize program level student learning outcomes in each area as well as planning for and providing individualized supports for social competence and independent living skills.
- Student Services Standard 2 addresses individualized advising, counseling, and support for students who live in dormitories or other residential life settings.
- Faculty and Staff Standard 2 requires coordination of services and supports between the program and others who do not work for the institution but serve in a support or instructional capacity.

Recommendation to the U.S. Department of Education:

Include the competitive preferences required in the Higher Education Act (HEA) in the next Request for Proposals for TPSID grants.

Recommendation to NCC:

Continue to prioritize providing resources and technical assistance to increasing and improving housing options and support.

Family Engagement

The role of parents changes as students enroll in higher education. While many parents of students with disabilities have had to advocate strongly throughout their child's life for needed educational and other services, their role shifts to supporting their son or daughter to become self-determined. Navigating this shift can be a challenge at times for parents, students, and IPSE programs. At the same time, parents will likely play a continued, although redefined, role in supporting their son or daughter after they leave higher education, so engaging families appropriately is important. Both IPSE programs and parents have expressed challenges in this regard, with programs sometimes indicating that parents want to be too involved and parents expressing concerns about being shut out, to the detriment of their adult child. Clearly defining roles and responsibilities is critical, and respecting the student's wishes for parental involvement is necessary. Note that the term "parent" applies to other family members or supporters when a parent is not available.

Kyle Douglas

Graduate of UP at Western Carolina University

"At college I really liked my classes and learning how to be independent. I was nervous, but college helped me overcome that and I learned how to do things better like read and budget my money. Now I am living on my own with a roommate and work two jobs at Lowe's and Bogarts. College gave me the skills to be independent, so I am now happy."



Standards:

- Student Services Standard 3 includes students and families in general orientation, and additional orientation if needed.
- Student Services Standard 4 requires programs to communicate general information about the program on an ongoing basis and to have a stated process for family engagement and communication that reflects roles and responsibilities for students, families, and staff. It also specifies that students and families must be informed in plain language about the Family Educational Rights and Privacy Act (FERPA), student control over parent involvement regarding the student, and the option for students to waive FERPA.
- Administrative and Fiscal Capacity Standard 2 requires programs to seek and consider ongoing input on program development, policies, and practices from a variety of stakeholders including students, alumni, and parents.
- Program Development, Planning, and Review Standard 1 addresses how this stakeholder input and other program evaluation is used for continuous improvement.

Recommendation to NCC:

Seek clarification on the role of guardianship with respect to FERPA.

Employment

Employment outcomes for individuals with intellectual disabilities who participate in IPSE programs are more positive than the outcomes for those who do not have that opportunity. One year after program completion, TPSIDs reported outcomes for 464 students who completed their Cohort 2 TPSID program in 2015–2016 through 2018–2019. This reflects a 59% response rate for all students who completed a program in these years. Fifty-nine percent (n= 275) of respondents to the one-year outcome survey had a paid job one year after exit. By comparison, 19% of adults with developmental disabilities in the general population had a paid job in the community in 2018–2019, the most recent year for which data are available (National Core Indicators, 2019).

One of the primary purposes of CTP programs, as defined in the Higher Education Act (HEA), is to prepare students for gainful employment. Note that these model accreditation program standards use the term “competitive integrated employment” rather than “gainful employment,” since CTP programs are considered by ED to be exempt from the gainful employment regulations (Baker, 2015). As explained in a webinar conducted by an ED official for the NCC, “in this instance the term ‘gainful employment’ refers generally to employment and participation in the workforce” (Think College, 2020).

The Workforce Innovation and Opportunity Act (WIOA) defines competitive integrated employment (CIE) for the first time in law to reflect competitive earnings, integrated location, and opportunities for advancement. WIOA also includes a definition of customized employment, a model specifically designed for youth with significant disabilities (Workforce Innovation and Opportunity Act, 2014).

The standards reflect a focus on preparing students for competitive integrated employment through person-centered planning, employment SLOs, individualized supports, inclusive career and employment settings, and student-focused employment goals. The next section addresses systemic issues that need to be addressed.

Standards:

- Curriculum Standard 5 requires the inclusive program of study to include instruction, internships, apprenticeships, or work-based learning, and other career development activities necessary for students to achieve and sustain competitive integrated employment aligned with the student’s goals.
- Student Services Standard 6 addresses individualized supports designed to enable the students to seek and sustain competitive integrated employment.

Recommendation to Congress:

In the next reauthorization of the Higher Education Act, substitute “competitive integrated employment” for “gainful employment” in the definition of “comprehensive transition and postsecondary program for students with intellectual disabilities.”

Systemic Barriers, Collaboration, and Fiscal Sustainability

Programs continue to struggle with obtaining financial resources, and the issue of long-term sustainability looms large. While there are examples of effective partnerships between programs and vocational rehabilitation (VR) agencies and between programs and Local Education Agencies (LEAs), many students, parents, and programs are having difficulty collaborating with VR agencies and LEAs to support students with ID with tuition and other supports in postsecondary programs.

The [Addressing the Policy Tangle](#) report documents the conflicts between the HEOA, IDEA and WIOA regarding these students. The HEOA requires ED to give preference in awarding TPSID grants to applicants that demonstrate partnerships with agencies “such as Vocational Rehabilitation Agencies.” It also requires applicants to partner with Local Educational Agencies (LEAs), including using IDEA funds. “The preamble to the IDEA 2004 regulations clearly states that IDEA Part B funds may be used to support transition-age students with ID in postsecondary settings.... Contrary to the intent expressed in the preamble, a more

recent Office of Special Education (OSEP) policy letter and a separate guidance document contradict the regulatory preamble language” (Lee, Rozell, & Will, 2018). New ED guidance published in September 2019 (U.S. Department of Education, 2019) and August 2020 (U.S. Department of Education, 2020) did not clarify the situation. While some LEAs place students in IPSE programs through the Individualized Education Program (IEP) process, or have other dual enrollment agreements with programs, or provide Service Plans for such students, many LEAs continue to be confused about what is allowed.

Similarly, the WIOA regulations preamble states, “...we clarify here that the vocational and other training services specified in final § 361.48(b)(6) encompass tuition and other services for students with intellectual or developmental disabilities in a Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities, as defined by the Higher Education Act of 2008.” However, several states interpreted a Rehabilitation Services Administration (RSA) technical guidance document to disallow the use of WIOA Pre-Employment Services (Pre-ETS) or other VR funding for students in postsecondary programs for students with ID (U.S. Department of Education, Office of Special Education and Rehabilitative Services, Rehabilitation Services Administration, 2017). Some mistakenly believed that the student must be working to obtain an industry recognized credential in order to be funded or provided supports.

The new OSERS guidance clearly states that VR funds may be used to support students in dual enrollment program and students with a disability in a CTP program. From reports from the field, it now appears that most state VR agencies now understand, at least at the leadership level, that VR funds may be used to pay for Pre-ETS services, tuition, and other services and supports for students with ID in CTP programs. This information is not always adequately relayed to the regional and local level or supported at a leadership level. It is not unusual for a student in one part of a state to obtain tuition support and a student in another part of the state to be told such funding is not allowed.

Reasons for not providing VR funding and services range from:

- Not understanding that they can do so.
- Mistakenly believing that support is not allowed for students in CTP programs if the credential received is not an “industry recognized credential.”
- Attitudes that students with ID cannot benefit from IPSE programs in terms of employment (programs viewed as not vocationally relevant).
- A lack of interest in supporting IPSE programs due to the cost and time commitment when compared to other more “common” VR approaches for the population.
- A lack of awareness of the positive long-term employment outcomes for students graduating from a CTP program or a presumption that individuals with ID are not capable of succeeding in higher education.

Despite these challenges, there are state and local VR agencies that have developed positive collaborations with programs and provide tuition support and services to students in CTP programs. A focus on the strategies, supports, and partnerships that will lead to competitive integrated employment is critically important as the inclusive postsecondary education field matures.

The impact of program “silos” is felt at the national, state, and local levels. State coalitions and task forces have developed over the past twenty years to break through the silos, raise or identify funding to develop programs, and start or expand inclusive postsecondary options in a state. *Life Learning Is for Everyone: The True Story of How South Carolina Came to Be a Leader in Providing Opportunities for Postsecondary Education to Young Adults with Intellectual Disabilities* (Bailey, 2012) describes one of the first successful state-wide efforts. A small group of parents and supporters raised and donated substantial funds and obtained over \$1 million in funds from the South Carolina legislature to fund the development of programs at five IHEs in the state. Once the programs were developed, the state funding was transferred to scholarships. A NCC issue brief highlights 27 pieces of proposed legislation and 11 pieces of passed legislation addressing inclusive higher education (Jernudd, Nagaraj, Mueller, & Rozell, 2019). One State’s Initiative to Increase Access to Higher Education for People With Intellectual Disabilities describes work in one state to involve families, universities, schools, agencies, and funders in improving access to inclusive postsecondary

education through four regionally based summits and a qualitative study (Mock & Love, 2012). Challenges in Coordinating and Managing Services and Supports in Secondary and Postsecondary Options, addresses challenges in service coordination at the state, local, and individual level and proposes strategies (Whelley, Zimbrich & Hart, 2002). These are a few of the many examples of successful and important work to address systemic barriers and create new postsecondary opportunities. These efforts are fundamental to establishing the postsecondary programs that the model standards will be used to accredit.

Robert Lewis

Graduate of Clemson LIFE Program at Clemson University

“What I liked best about college was making new friends, going to football games, managing the Clemson men’s basketball team, being in a service fraternity, and working at the Clemson Outdoor Lab and at McAlister’s deli. College has changed my life because I learned how to live independently in an apartment with friends. Now that I graduated I am sharing an apartment with my best friends from college and I have kept my job as a cashier at McAlister’s deli.”



Challenges with silos and systemic problems exist in other areas as well. Students with ID face many barriers to participation in apprenticeship programs and other programs that lead to industry recognized credentials. Apprenticeships are formal academic and (often paid) work experiences of extended duration in which an apprentice learns occupational skills related to a trade, such as in construction or manufacturing. Apprenticeship programs may involve an employer and a community college or university and a trade union and typically result in a paid job, with VR support available if appropriate. Registered apprenticeships result in an industry recognized credential. Students in IPSE programs face serious obstacles to securing registered apprenticeships, such as not having attained a high school diploma or a high school equivalency (HSE), which an employer often may require. Examples of other silo problems a student might encounter are the inability to access work-based learning experiences or other employment preparation practices. Also challenging are negative attitudes on the part of employers or co-workers regarding the lack of skills or work readiness of a person with ID and lack of collaboration among state agencies regarding eligibility of students in postsecondary education for apprenticeships. These barriers also impact IPSE students interested in obtaining other types of industry recognized credentials. A student in an IPSE program studying, for example, to become a childcare assistant may be able to do the required work but not be able to pass the required assessment, due to the reading level of the test and lack of needed accommodations. Students and IPSE programs also report that students are not able to access college tuition benefits they should be entitled to as adult children of veterans. As the field continues to grow and model standards are implemented, it is essential to fully identify and address these and other systemic barriers.

The work that advocacy coalitions, NCC and academics have done to address the problem of silos and systemic barriers is not primarily their responsibility or the responsibility of IPSE programs or even IHEs. Much more collaboration is required of government—across agencies at the federal level and across relevant agencies at the state level. Collaboration must be more substantively defined and measured—and accountability for it—appropriately assigned.

Standards:

- Student Services Standard 3 requires that financial resources are adequate and available to meet obligations and sustainability plans are adequate, reviewed, and updated.
- Administrative and Fiscal Capacity Standard 3 requires programs to have a viable plan for current and future sustainability.

Joint recommendation to Department of Education and Congress:

- Identify and address legislative and administrative barriers to participation by postsecondary students with ID in accessing and meaningfully participating in:
 - » Vocational rehabilitation services and funding.
 - » IDEA dual enrollment and the use of IDEA funds for transition-age students still eligible for IDEA services.
 - » Higher education benefits for children of veterans.
 - » Industry recognized credential programs.
 - » Apprenticeship programs.

Recommendations to the Department of Education:

- Highlight and broadly share employment and other positive outcomes of comprehensive transition and postsecondary education programs.
- Highlight and broadly share examples of collaboration between vocational rehabilitation agencies and programs and examples of collaboration between local education agencies and programs.

Recommendation to NCC:

- Develop informational materials and strategies to support the development of fiscal sustainability plans.

Addressing Student Complaints and Code of Conduct Issues

College programs contend with many complex and confounding issues related to Title IX and their respective Student Codes of Conduct. This is definitely an area wherein college programs are struggling to align the needs and interests of their students with that of the requirements and regulations of IHEs developed before students with ID became part of the college communities. IPSE programs and families report students with ID do not always understand the formal language of the written rules and need support when complaints are raised by and against them and if they are at risk of early exit.

Standards:

- Updated Student Complaint Standards 1, 2, and 3 address programs building ongoing relationships with campus code of conduct offices, providing accessible versions of the code of conduct, and providing support to students who have complaints lodged against them or those seeking to lodge a complaint or who are at risk of expulsion or early exit.

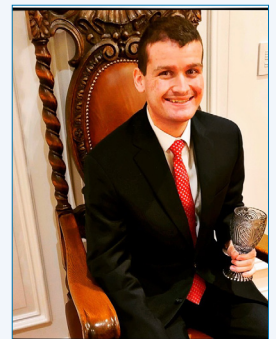
Recommendations to NCC:

- Develop materials and resources based on effective practices related to accessibility of IHE documents, support for students with ID who file complaints or have complaints filed against them, and methods of supporting students with ID at risk of expulsion or early exit.

Mats von Quillfeldt

Graduate of Mason LIFE Program at George Mason University

“The best things I liked about college were my internships on Capitol Hill, Zeponic Farm and The Fresh Market. College changed my life to be able to live and work independently. I now work at Harris Teeter in Charlottesville, Virginia and have my own apartment with two roommates. I would not be able to do either without my Mason LIFE experience. I also learned to use the Metro and Uber and plan my daily life.”



NEXT STEPS FOR 2021—2025 WORKGROUP

The 2020-2025 NCC and its accreditation workgroup will build on the OPE-funded work that previous NCC accreditation workgroups have established. The NCC's scope of work includes establishing a program accreditation process that may be used by college programs for students with ID to become accredited, utilizing the field-tested Model Accreditation Standards included in this report.

To this end, the NCC has convened a 2021–2025 Accreditation Workgroup comprised of all required representatives: an expert in higher education, an expert in special education, a disability organization that represents students with intellectual disabilities, a representative from the National Advisory Committee on Institutional Quality and Integrity, a representative of a regional or national accreditation agency or association, and additional experts.

Phase I: Development and Recruitment Activities

The NCC will work with the current Accreditation Workgroup to develop a draft process and the associated tools necessary to support implementation of program accreditation including an eligibility application, a self-study report framework, and a site accreditation report template. The NCC will create a web-based interface housing these tools, and build mechanisms necessary for IPSE programs to access all resources needed to conduct pre-accreditation activities.

Accreditation site visit reviewers will be recruited and will receive training on use of the eligibility application and self-study report, conducting a site visit, and writing the site accreditation report.

Phase II Pilot Accreditation Process

A pilot of the full accreditation process with 5 pilot sites will be conducted, testing and refining tools and mechanisms used to conduct pre-application activities (self-study), site visit, and culminating reports.

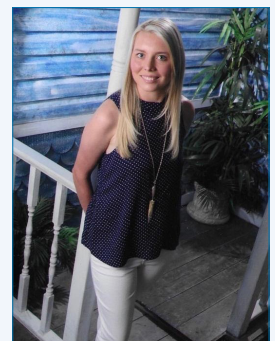
Phase III Accreditation Process and Determination Finalized

Pilot findings will be documented in a report and presented to the Accreditation Workgroup for feedback and subsequently will be used to finalize all processes and materials.

Lara Klein

Senior in the Transition and Access Program (TAP) at the University of Cincinnati

“When I was twelve years old, my family got a dog because my brother was diagnosed with leukemia. This is when I also found my passion for animals and to work in the veterinary field. I have always wanted to go to college, but I was not sure how I would get to where I am today. TAP has changed my life because of the work opportunities and has been a good starting point for my career. TAP placed me in internships at a pet store and the Cincinnati Zoo where I learned some skills and saw what it would be like to work in the veterinary field. After I graduate from TAP, I plan on continuing my education to earn a Veterinary Assistant certificate. My dream job is to be a private practice veterinary assistant working with dogs and cats.”



MODEL ACCREDITATION STANDARDS FOR HIGHER EDUCATION PROGRAMS FOR STUDENTS WITH INTELLECTUAL DISABILITY

Model Standards, Guidance, and Review Requirements

MISSION STANDARDS

MISSION STANDARD 1:

The program has a written mission statement that is consistent with the Higher Education Act (HEA) requirements that the program is a “degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID) who are seeking to continue academic, career and technical, and independent living instruction” in order to obtain competitive integrated employment (CIE).

Guidance

The mission statement must be consistent with the statutory and regulatory requirements in the HEA. However, a mission statement is not required to explicitly include the language from the definition of a “student with an intellectual disability” and the definition of a “Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities” (CTP) in the HEA. The intent of this standard is to ensure that the mission standard aligns with the law and does not contradict it. For instance, the HEA states that programs must serve students with ID. A mission statement that affirms that the program serves students with a variety of disabilities would be contradictory to the intent and language in the HEA. See glossary for CTP, ID, and CIE definitions.

The term “gainful employment” is used in the CTP definition in HEA. However, the US Department of Education (ED) no longer considers CTPs to be gainful employment programs. The updated term “competitive integrated employment” is used instead, as it is defined in the Workforce Innovation and Opportunity Act (WIOA), and that definition may be found in the glossary.

Required for Review

- Provide the mission statement.
- Describe how the mission aligns to the HEA ID and CTP definitions.
- Provide documentation that the institution is accredited, including the name of the recognized accrediting agency that has accredited the institution.

MISSION STANDARD 2:

The written mission statement is communicated to prospective and current students, families, staff, faculty, and the public, and is reviewed at least every third year or sooner if there are significant changes to the program.

Guidance

The mission statement is communicated to a variety of stakeholders through multiple communication channels. There must be a process in place that outlines the schedule and conditions under which the mission statement is reviewed by both internal and external stakeholders and revised, if necessary, on a regular basis.

Required for Review

- Indicate how the mission statement is communicated to prospective students, students, families, staff, faculty, and the public.
- State when the current mission statement was written or last revised
- State the process and timeline for periodic evaluation of the mission statement.

STUDENT ACHIEVEMENT STANDARDS

STUDENT ACHIEVEMENT STANDARD 1:

The program has established a Satisfactory Academic Progress (SAP) policy that includes criteria for evaluating student progress in academics, socialization, independent living, and career development, and the impact of such evaluation on student advancement towards program completion. The program specifies how students advance through a full course of study and maintain satisfactory academic progress.

Guidance

The federal definition of Satisfactory Academic Progress is: “A required measurement of a student’s academic progress towards their academic goal. Progress must be measured by both grade-based (qualitative) and time/pace of completion (quantitative) standards. For programs lasting one year or less, SAP must be assessed at the end of each payment period. For programs lasting more than one year, SAP must be assessed annually (corresponding with the end of a payment period). SAP must be measured cumulatively.”

The preceding federal SAP definition addresses measurement of a student’s academic progress, based on substantial public input, SAP for these programs must also address measurement of student progress in the areas of socialization, independent living and career development.

Required for Review

- Provide the institution’s SAP, and describe how this is applied to students in the program.
- Provide the program SAP policy, including information about how SAP is measured in academics, socialization, career development, and independent living.

STUDENT ACHIEVEMENT STANDARD 2:

The program has established a program level Student Learning Outcomes (SLO) assessment plan and a process that allows it to measure student achievement in varied domains including academics, socialization, independent living, and career development.

Guidance

Student learning outcomes (SLOs) articulate what students know and can do in various domains upon completion of the program. SLOs should be appropriate to the nature of the program, clear, concise, measurable, and observable. The process/plan will include written student learning outcomes expected of all students in the program, the methods to assess the extent to which the SLOs are met, and a schedule that indicates when data are collected and analyzed.

The Student Learning Outcomes Assessment Plan must contain the following elements:

- Written Student Learning Outcomes (SLOs), which include the following key elements:
 - » Who: (the student) “Upon completion of this program, students will be able to...”
 - » What: skill/information
 - » How learning/attainment is demonstrated: (for example, by exam, project, presentation, portfolio, etc.)
 - » Description of the methods that will be used to assess the extent to which the SLOs are met (such as letter grades, rubric graded, pass/fail, etc.)
- The data that will be collected; and
- A schedule that indicates when data are collected and analyzed (at least annually).

Required for Review

- State the student learning outcomes for the program.
- Describe the plan and process used to determine if the SLOs are achieved.
- Provide the schedule for collecting and analyzing the data.
- Indicate how the information regarding the achievement of student learning outcomes is shared and with whom.

STUDENT ACHIEVEMENT STANDARD 3:

The program provides individualized learning plans for the student, for each college catalog course attended by the student, that identifies: what the student is expected to learn; how the student will be evaluated; and supports, strategies, accommodations or modifications that are needed for the student to master essential learning.

Guidance

All students in the program participating in college catalog courses must have a learning plan for the course. "College catalog course" refers to courses in the college catalog that are taken by matriculating students for credit towards a degree or certificate. Supports, strategies, and accommodations identified in the student's person-centered plan are included in the learning plan.

Programs have a process to outline the individual learning goals and expectations for each student in each college class that is based on the course syllabi and the learning goals for all students in the class, with accommodations and modifications as needed. Note that modifications are only allowed if the course is being audited or otherwise not taken for credit towards a degree. The learning plan will be shared with the student and with the faculty member teaching the course. The program staff will support the student in learning the material, if needed, and to the extent possible will collaborate with the faculty member on evaluation of student learning.

The individual learning plans must be developed by a professional staff person or faculty member. If undergraduate or graduate students are involved, they must be under the supervision of professional staff.

Required for Review

- Describe the process for analyzing syllabi and course expectations, identifying what individual students are expected to learn, and how they will be evaluated and supported.
- Provide several redacted examples of such plans, including the course syllabi upon which it is based.
- Indicate the position(s) of the individuals who conduct this process (such as faculty, program staff, graduate students, etc.).

STUDENT ACHIEVEMENT STANDARD 4:

The program provides students with a written report at the end of each "academic unit" (semester, trimester, etc.) understandable to the student, that clearly indicates evidence of student progress in the areas of academics, socialization, independent living, and career/employment.

Guidance

The written reports are reviewed with the student at a minimum at the end of each academic unit. These records are retained for a period of seven years.

Required for Review

- Provide a description of the assessment processes used by the program to determine student achievement, i.e., rubrics, pass/fail, academic grades, portfolios, etc., in each area.
- Provide a copy of the report format that is reviewed with the student, the timeline for report review, and a description of how the report is made understandable to the student.
- Provide several samples of redacted student reports.

STUDENT ACHIEVEMENT STANDARD 5:

The program sets goals for student pace of completion and retention rates that are ambitious but attainable and appropriate to the mission of the program. The program monitors and reports pace of completion and retention rates.

Guidance

Completing the program within a reasonable period of time is important for student retention and success. Retention is also a key factor in determining if a program is meeting the needs of its students and for accountability purposes.

Required for Review

- Provide the goals set by the program for student pace of completion (the amount of time it takes students to complete the program). Provide the actual results—the number and percentage of students who completed the program on time during recent years. For students who did not complete the program on time, provide information about how long they took to complete. Such information must be provided by class (freshman, etc.).
- Provide the goals set by the program for student retention rates (the number and percentage of students who remain in the program) by class (freshman to sophomore year, etc.) and the actual results for recent years. Indicate the reasons students provide for leaving the program prior to program completion.
- Documentation that the data are made publicly available.

CURRICULUM STANDARDS

CURRICULUM STANDARD 1:

The program has an inclusive program of study that aligns with the statutory and regulatory requirements for a Comprehensive Transition and Postsecondary Program (CTP) in the Higher Education Act (HEA) law and regulations and is consistent with the program’s mission and program outcomes.

Guidance

An “inclusive program of study” refers to the courses, expectations, and requirements needed to earn the credential awarded by the program and for program completion. It must align with the HEA requirements in the definition of a Comprehensive Transition and Postsecondary Program (CTP), although it is not necessary to include the HEA language in the inclusive program of study description. An individual student’s course of study within the program will be determined through a person-centered plan.

Specific aspects of the CTP definition are covered in various standards. With respect to the inclusion requirements in the CTP definition, students in the program must be socially and academically integrated with non-disabled students to the maximum extent possible. The program must ensure and document that students meet the minimum 50% inclusion requirements in the HEA, which states that at least half of the students’ time must focus on academic components through one or more of the following:

- Coursework with students without disabilities, including taking courses for credit or audit (or otherwise participating in courses for which the student does not receive regular academic credit), or taking non-credit bearing, non-credit courses.
- Participating in internships or work-based training in settings with individuals without disabilities

The inclusive program of study describes a list of courses, additional learning experiences including campus membership, social engagement and independence development activities, and career development and employment activities that make up the requirements that all students must complete to earn the credential.

Students use person-centered planning to choose courses and other learning activities to participate in that support their personal goals, while still meeting the overall requirements of the inclusive program of study. Students complete the number of hours and the range of experiences that are required but have choice within that structure to the greatest extent possible. In the case where they are pursuing a course of study that leads to an industry recognized credential such as childcare assistant, there are likely to be specific courses required in order to earn the credential.

As indicated in the introduction, this standard applies whether or not the US Department of Education has approved the program as a CTP for financial aid purposes. If the program has been approved as a CTP by the Department, evidence of meeting this standard must still be provided. CTP approval from the Department is not required in order for the program to be accredited.

Required for Review

- State the intended program outcomes for the program (broad program goals).
- Provide a description of the inclusive program of study that includes a clear and detailed outline that illustrates all required activities of the inclusive program of study that leads to a program credential.
- Provide the program of study description that clearly documents that the students spend at least half time in courses with students without disabilities or internships or work-based learning experiences, which may include apprenticeships or paid jobs, in settings with individuals without disabilities.

CURRICULUM STANDARD 2:

The program utilizes and documents a person-centered planning approach that provides for maximum choice for the student within the inclusive program of study.

Guidance

In the context of inclusive higher education, person-centered planning (PCP) is used as a framework to plan activities, courses, supports, problem-solving, etc. that include specific goals that serve as an action plan to

achieve the student's vision for his or her future. A variety of planning tools may be used for PCP, and some programs develop their own tool. More information on PCP and a description of various PCP planning tools may be found at <http://project10.info/DPage.php?ID=103>. If the tool that is used results in graphics, partial sentences, etc., then the PCP must be written in understandable, plain language.

The PCP is a "living document" that is reviewed and, if needed, updated each "academic unit" (e.g., semester, trimester). A few states have specific requirements regarding PCP for purposes such as the use of Self-Determination Funds. The PCP requirement in this standard is not intended to duplicate other PCPs the student may be involved in, nor is it intended to create bureaucratic requirements. Rather, the intent is to have the student's educational experience guided by a student-focused plan with specific goals and action steps that will lead to the student's vision for his or her future.

The PCP must include a description of "what works" for the student, including learning strategies, accommodations, and individualized supports and services. There is no expectation or requirement that the PCP be a lengthy document.

Required for Review

- State the tool that is used for person-centered planning.
- If the program has developed a program-specific planning tool, share that tool.
- Describe how person-centered planning informs the individual course of study for each student (i.e. how does it inform course selection or employment experiences, social experiences, etc.)
- State how often the PCPs are reviewed and updated, as needed.
- Share several completed PCPs with personal information redacted.

CURRICULUM STANDARD 3:

Students with intellectual disabilities participate in a wide array of postsecondary level courses from multiple disciplines and departmental/college units that are part of the curriculum for degree or certificate programs.

Guidance

Students must have a wide array of course options from which to choose. Limiting students to a few options, such as only physical education courses, is not acceptable.

However, some programs may have a set curriculum that leads to a credential in a specific career which would by necessity limit choice in terms of academic courses. In those cases, the required curriculum may be used, but the program must still meet the requirements in the law, as outlined in Curriculum Standard 1, that students spend at least 50% of their time in courses with non-disabled students or work settings with non-disabled individuals.

Required for Review

- If restrictions exist that limit course access for students in the program at the institution, state the access policy.
- Provide a list of the college catalog courses that are part of the curriculum for degree or certificate programs that are, or have been, taken (for credit, audit, or other participation) by students in the program, indicating how many students in the program have taken these courses in the recent past.
- The list must indicate the course department or discipline. The college catalog courses included in the list must not be "specialized" courses only for students with ID.
- Share several examples of redacted transcripts that clearly show the college catalog courses taken by the students.
- If a set curriculum is used for a career-specific certificate, provide the curriculum and information about how the students' participation meets the minimum 50% requirement.

CURRICULUM STANDARD 4:

The inclusive program of study is delivered to students physically attending the institution, with some distance learning allowable if it is applicable to and benefits students with intellectual disability.

Guidance

The CTP definition in the Higher Education Act (HEA) regulations states that the program “(2) Is delivered to students physically attending the institution.” The preamble to the Higher Education Act Title IV regulations states, “the Department does not wish to regulate to preclude all distance courses for students with intellectual disability and may permit a limited number of courses to be delivered via distance, as long as the institution explains why it believes the course is applicable to, and benefits, students with intellectual disability. Similarly, we wish to clarify that a comprehensive transition and postsecondary program may include an internship for students or other activities that are located off-campus—the physically-attending requirement does not exclude these activities.”

Therefore, the program may offer off-campus learning opportunities including internships, apprenticeships, or other work experiences. A limited number of courses may be permitted via distance learning, as long as the institution explains why it believes the course is applicable to, and benefits, students with intellectual disability. Learning may also include some online aspects of in-person classes.

The requirement limiting distance learning does not apply when the institution of higher education is closed for public health reasons or due to a natural disaster. In such cases, distance learning is allowed however institutions must still provide social and academic inclusion, and individualized supports for students.

Required for Review

- Indicate if students participate in any distance learning, and if so, detail what percentage of students’ time is spent in distance learning.
- For any distance-learning courses, indicate why the course is applicable to and benefits students in the program.
- If the institution is or was closed due to a natural disaster or public health reason, indicate how distance learning is occurring and how students are provided social and academic inclusion as well as individualized supports.

CURRICULUM STANDARD 5:

The inclusive program of study includes instruction, internships, apprenticeships

or other work-based learning, and other career development activities necessary to enable students to achieve and sustain competitive integrated employment (CIE) aligned with person-centered goals.

Guidance

The instruction and activities must be geared towards enabling the student to achieve CIE, instead of non-work, sheltered work, and/or work at subminimum wage. See glossary for CIE definition.

Required for Review

- Describe the portion of the inclusive program of study related to internships, apprenticeships, work-based learning, or other practices that will enable students to achieve and sustain competitive integrated employment.
- Provide a list of internships, volunteer or paid employment, or apprenticeships, and other employment-related instruction and practices provided in the current year and previous three years.
- Provide data on the employment outcomes of program alumni for the past two years, including data on the number and percentage of students who obtain CIE.

CURRICULUM STANDARD 6:

The inclusive program of study includes student engagement in inclusive social experiences and other campus-based activities. Individualized support, instruction or activities necessary to enhance student social competence must be included in the inclusive program of study.

Guidance

The program adheres to the Higher Education Act (HEA) requirements that students must receive individual supports and services for academic and social inclusion in academic courses, extracurricular activities, and other aspects of the institution of higher education's regular postsecondary program. This standard is intended to address how student engagement is a part of the inclusive program of study, not just what students are allowed to do or access.

The standard also addresses the requirement that individualized support for active campus membership, social engagement, and the development of social competence must be provided and guided by each student's person-centered plan.

Social competence refers to the ability to handle social interactions effectively and involves communicating and interacting appropriately and effectively with others. Factors in achieving social competence include the development of social skills, self-regulation, interpersonal knowledge and skills, positive self-identity, and planning and decision-making skills. Social engagement includes developing and maintaining reciprocal, meaningful relationships. Social competence and engagement improves the quality of inter-personal relationships and the ability to live interdependently in the community and is an important factor in employment success.

Required for Review

- Describe how student engagement is incorporated in the inclusive program of study.
- Describe how campus membership is supported in the inclusive program of study.
- Provide a list of clubs, teams, student activities, or other campus activities each student has participated in for the past two years. Indicate if any students did not participate in any campus activities, and if so, why not.
- Describe how social engagement and meaningful relationships are facilitated and by whom.
- Describe how your program addresses improvement in each student's social engagement and social competence in a manner that is individualized, planned, facilitated, and evaluated.

CURRICULUM STANDARD 7:

The inclusive program of study includes individualized support, instruction, or other activities designed to support development of students' independent living skills and be guided by each student's person-centered plan.

Guidance

The CTP definition in the Higher Education Act (HEA) includes supporting students with intellectual disabilities who are seeking to continue independent living instruction. Various programs utilize a variety of approaches to support students in increasing their independence through, for example, individualized learning activities such as instruction in technology tools. Nothing in this standard is intended to require the use of separate classes to teach independent living skills.

Examples of areas of independent living skills include, but are not limited to, skills in the following areas that help individuals live and work in the community: self-advocacy and self-determination; "soft skills" competencies such as critical thinking and problem solving; financial management; personal care and management of the home, health and safety, nutrition, and use of transportation.

Required for Review

- Describe how students are supported to become more independent through aspects of the inclusive program of study, for example, individualized learning activities such as instruction in the use of technology tools, or using calendars to schedule activities and classes, etc.
- Indicate what specific areas of independent living skills are considered for each student.
- Describe how improvement in each student's independent living skills is addressed by your program in a manner that is individualized, planned, facilitated, evaluated, and guided by person-centered planning.

FACULTY AND STAFF STANDARDS

FACULTY AND STAFF STANDARD 1:

Staff and other professionals that work directly for the program have education and training commensurate with their roles and responsibilities and participate in ongoing professional development and training.

Guidance

This standard does not refer to IHE faculty who teach college catalogue courses that the students attend. It refers to the staff and other professionals that work directly for the program, such as a director, academic support staff, administrative and support staff, job specialist, job developer, or job coach.

Professional development and training must include information about intellectual disability and how it may impact students' learning, communication, written and oral language, and behavior as well as strategies for effectively supporting students, such as positive behavior supports, communication strategies, effective use of technology tools, universal design for instruction, etc.

Required for Review

- Provide an organizational chart that illustrates your program staffing.
- Provide resumes or CVs for all staff.
- Share information on professional development and training provided, including materials, schedules, and evaluations of the training.

FACULTY AND STAFF STANDARD 2:

The program must ensure coordination of services and supports between the program and staff and other professionals who do not work directly for the institution but serve in a support or instructional capacity for the students.

Guidance

It is essential that meaningful coordination occurs. This standard refers to those programs that have agreements with non-institution agencies, organizations, school districts, or individuals to instruct or support students in the program. Examples are school district employees who act as educational coaches, personnel that provide assistance in activities of daily living, or job specialists, etc., who work for an outside agency. This standard does not apply to individual therapists or others who work with an individual student at the student's request.

Required for Review

- Indicate if any staff or professionals or outside agencies work directly with the students as part of the program.
- If so, describe the coordination that takes place between the agency and the program.
- Share Memoranda of Understanding (MOU) if they have been established between agencies and the program.

FACULTY AND STAFF STANDARD 3:

Program staff receive a job description that lists roles and responsibilities. Performance criteria are clear, and evaluation is conducted on a regular basis, consistent with the policies of the institution.

Guidance

The program must provide a clear job description in writing and performance criteria and procedures for evaluation at the onset of the evaluation period. Evaluations must be regular, fair and objective and the results shared with staff in writing in a timely manner.

Required for Review

For each position, provide:

- A job description that includes roles and responsibilities.
- A description of the education and training required for this position.
- The process for regular evaluation of this position.

FACULTY AND STAFF STANDARD 4:

Program management and leadership are retained for a reasonable period of time.

Guidance

Retaining program management and leadership is one of the hallmarks of a quality program. It is recognized that graduate teaching assistants serving in management or leadership roles may leave for other positions upon receiving their graduate degree and are not necessarily expected to remain with the program. The program plans for and manages staff turnover and succession.

Required for Review

- Indicate the program management and leadership positions (such as Director, Program Coordinator, etc.) and indicate how long the person currently in that position has been serving in that role.

FACULTY AND STAFF STANDARD 5:

Other individuals who work with students, such as peer mentors and pre-professionals or professionals-in-training (such as individuals training to become educators, counselors, speech and language pathologists, occupational or physical therapists) are trained and supervised.

Guidance

Peer mentors, pre-professionals, and professionals-in-training provide a variety of important supports and activities in programs and may be paid or volunteer. This standard is intended to address the need for appropriate roles, training, and supervision of such individuals. While these peers and professionals-in-training often play a critical and meaningful role within programs, it is important that they are assigned responsibilities that take into account their current level of experience and knowledge. All such students working directly with students in the program must be regularly supervised by professional staff. For instance, while a peer mentor may be a good academic coach, a professional must develop meaningful learning strategies, accommodations, and modifications for students.

Required for Review

- Provide training schedules and agendas, roles and responsibilities, job postings and recruitment materials. Indicate who is responsible for providing the training and supervision.
- Provide supervision practices and schedules.

FACULTY AND STAFF STANDARD 6:

Training and technical assistance are provided to the institution's faculty and staff to develop learning environments, courses, and instruction according to the principles of Universal Design for Learning (UDL).

Guidance

While programs are not in a position to require higher education faculty to deliver instruction in any particular manner, training and technical assistance by individuals knowledgeable about UDL and how it can support the learning of students with ID must be provided to meet this standard. UDL training and technical assistance may be provided by the program, the institution, or an outside agency or individuals.

For information on the principles of universal design for learning see www.udlcenter.org or <http://udloncampus.cast.org/home#.VgWtcOm4nx4>

Required for Review

- Indicate who is providing the training and technical assistance.
- Provide training agendas, schedules, and evaluations.
- If provided by the program, indicate how many faculty/staff are trained per year.

FACULTY AND STAFF STANDARD 7:

Information and support about the impact of an individual student's disability on learning, and strategies to support, instruct, and assess the student, are offered to the institution's faculty and staff to improve and optimize the student's learning in courses taught by that faculty or staff.

Guidance

Faculty and Staff Standard 1 addresses general UDL training. This standard addresses information and technical assistance regarding individual students and may include UDL as well as other areas. Information regarding "what works" for individual students is developed with student input, and the student must agree to the information being shared prior to the information being provided to others. This is part of the person-centered planning that is conducted for each student and is designed to ensure that the student is well-supported by all campus faculty and staff, not just program staff. This kind of respectful and positive information about students will allow them to become full members of the campus community and be understood by a wide range of people on campus.

Information and technical assistance may be provided by the program, the disabilities services office, or by other trained professionals. Such information and technical assistance may involve academic, behavioral, communication, technology, or other types of support. It is not appropriate for undergraduate students to provide technical assistance to faculty and staff.

While the program or institution shall offer information and technical assistance, it is recognized that a program is not in a position to require faculty and non-program staff to utilize it.

Required for Review

- Describe the process the program uses to ensure that faculty and staff are provided such information and technical assistance.
- Indicate the professionals who provide the information and technical assistance, including their titles and qualifications to do so.
- Provide information about the type of information and technical assistance that is provided.
- Describe how the student is involved in developing the information relevant to themselves that is shared with the faculty.

FACILITY, EQUIPMENT, AND SUPPLY STANDARD

FACILITY, EQUIPMENT, AND SUPPLY STANDARD 1:

Students in the program have access to institutional facilities, equipment, and supplies consistent with other students with the same student status.

Guidance

"Student status" refers to the status of the student in the institution, such as matriculating, degree, non-degree, certificate, continuing education, etc.

This standard addresses facilities, equipment such as computers, and supplies ONLY. See Student Services Standard 5 to address services, social, and recreational activities. Institutions are not in a position to require outside entities such as the National Collegiate Athletic Association (NCAA) to change their rules. However, except in situations controlled by outside entities, students in the program must, at a minimum, have access to institutional facilities consistent with other students with the same student status.

Required for Review

- Document that students in the program have student identification cards that provide access to institutional facilities consistent with other students with the same student status.
- Provide a checklist of the institution's facilities and indicate which facilities are accessible to students in the program on the same basis as other students with the same student status.
- Indicate the student status of the students in your program. If student status limits access, indicate how it does so.

ADMINISTRATIVE AND FISCAL CAPACITY STANDARDS

ADMINISTRATIVE AND FISCAL CAPACITY STANDARD 1:

The program is a part of a department or unit of the institution, with a recognized place within its administrative structure.

Guidance

The program must be embedded within the institution's organizational structure. The head of the department or unit is aware of the program and its role within the department/unit.

Required for Review

- Provide an organizational chart or other description of the institution's administrative structure that indicates the department or unit in which the program resides.
- Provide evidence of engagement with key administrators such as deans, etc., of the administrative unit where the program is located.

ADMINISTRATIVE AND FISCAL CAPACITY STANDARD 2:

The program seeks and considers ongoing input on program development, policies, and practices from a variety of stakeholders that includes students, alumni, and parents.

Guidance

The program has a demonstrated process for soliciting and using stakeholder input at least annually, including input from current and former students and family members. The program must demonstrate how the input impacts program development, policies and practices, or how student and family input is addressed if not implemented.

Required for Review

- Describe which categories of stakeholders are consulted at least annually, in addition to current and former students and parents. For example, faculty, administrators, peer mentors, community leaders, employers, employment support agencies, etc. Examples are for illustrative purposes only, and each category is not specifically required.
- Provide evidence showing how input is obtained through, for example, an advisory committee, focus groups, surveys, interviews, etc., and the schedule for doing so.
- Describe any supports or accommodations provided to ensure the meaningful participation of individuals with disabilities and family members.
- Identify what specific changes to program development, policies, practices, or outcomes have resulted from the input.

ADMINISTRATIVE AND FISCAL CAPACITY STANDARD 3:

Programs have a viable plan for current and future fiscal sustainability.

Guidance

Financial resources are adequate and available to meet obligations to students, staff and other contractual parties. Sustainability plans are adequate, reviewed annually, and updated as needed.

Required for Review

- Provide the program's fiscal sustainability/business plan.
- Describe the funding structure for the program, including sources of income and expenses.
- Provide the current and following year's program budget including income, expenses, reserves, emergency funds, etc.
- If grant funding is currently received, indicate how the program will be funded when the grant ends.
- If the program has any contracts, MOUs, or partnership agreements with third parties, indicate the nature of any obligations to which these private or public partners have agreed. Examples of public partners include school districts, vocational rehabilitation adult services, and Medicaid agencies.

STUDENT SERVICES STANDARDS

STUDENT SERVICES STANDARD 1:

The admission policies and practices ensure that all students who are admitted meet the definition of a “student with an intellectual disability” in the Higher Education Act (HEA) law and regulations.

Guidance

Institutions must adhere to the statutory and regulatory requirements regarding the definition of a student with an intellectual disability in order to be accredited and must document that it enrolls students who meet the ID definition in HEA. If the educational records for a student being considered for admission do not identify the student as having an intellectual disability, then the institution must obtain documentation establishing that the student has an ID such as (1) a documented comprehensive and individualized psycho-educational evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional; or (2) a record of the disability from a local or state educational agency or government agency, such as the Social Security Administration or a vocational rehabilitation agency, that identifies the intellectual disability.

Documentation of the student meeting the HEA ID definition must be retained for a period of seven years. See the glossary for the definition of students with intellectual disabilities in the HEA and the regulatory language that explains how to document an ID if the student has not been so identified in K–12.

Admissions requirements must not be so “challenging” that students with ID are unlikely to be admitted. Consider if your admission requirements are unlikely to be met by anyone with more than a mild intellectual disability or mild support needs. Note that admissions requirements that require students to be fully independent prior to admission are not acceptable, since supporting students in gaining independent living skills and abilities is one of the components of CTPs in the HEA.

Required for Review

- Provide admission requirements and policies.
- Provide a description of the admissions process.
- Provide information about the documentation used to determine that the student has an ID.
- Provide assurance that documentation records are retained for at least seven years.

STUDENT SERVICES STANDARD 2:

The program provides academic, employment, personal, and other advising and counseling, based on person-centered planning and individual interests and needs, and in collaboration with existing institutional services.

Guidance

Students need ongoing advice, counsel, and support in all aspects of their program and postsecondary experience. This includes advice, counsel, and support for students who live in dormitories or other residential life settings if students have that opportunity.

Required for Review

- Describe the types of advising and counseling (academic, career, social, interpersonal, independent living, conflict resolution, etc.) students are provided.
- List who is providing each type of advising/counseling and how the individuals are trained and supervised, including in resident life settings, if any.
- Describe collaboration with existing IHE services.

STUDENT SERVICES STANDARD 3:

Students and families are included in the institution’s general orientation programs and additional orientation is provided as needed.

Guidance

Students and their families are included in general IHE orientation programs, and the program may provide additional orientations for students and families as needed. Pre-arrival and ongoing orientation is provided (1) to support students in their adjustment to the program and institution and (2) to help them understand

the program and institutions rules, policies, and procedures, as well as health and safety issues.

For students without families, or whose families are not able to be involved, other supporters may be included.

Communication regarding FERPA and individual students is addressed in Student Services Standard 4.

Required for Review

- Provide documentation regarding the orientation programs and activities in which the students participate.

STUDENT SERVICES STANDARD 4:

General information regarding the institution and the program is communicated to students and families on an ongoing basis. The program has a stated process for family engagement and communication that reflects clearly defined roles and responsibilities for students, families, and staff.

Guidance

General information about the institution and the program is provided on a regular basis to students and families. The program also shares a written process to engage and communicate with families that clearly defines the roles and responsibilities of students, families, and staff. Students and families are informed in plain language about requirements in the Family Educational Rights and Privacy Act (FERPA), student control over parental involvement, and the option for students to waive FERPA requirements and how to do so.

For students without families, or whose families are not able to be involved, other supporters designated by the student may be provided such general information.

Required for Review

- Provide information about the ongoing communication regarding the institution and program that is provided to students and families.
- Provide the information that is given to students and families regarding the defined roles and responsibilities of students, parents, and staff.
- Provide the plain language FERPA information that is shared with students and families and indicate how it is provided. Information buried in large documents or a website link is not sufficient.

STUDENT SERVICES STANDARD 5:

Students in the program have access to services, and social and recreational activities, consistent with other students with the same student status.

Guidance

“Student status” refers to the status of the student in the institution, such as matriculating, degree, non-degree, certificate, continuing education, etc.

This standard addresses access to services, social, and recreational activities only. See Facility, Equipment, and Supply Standard 1 for access to facilities. Institutions are not in a position to require outside entities such as the National Collegiate Athletic Association (NCAA) or fraternities or sororities to change their rules. Typically fraternities and sororities require their members to be degree-seeking students. However, except in situations controlled by outside entities, students in the program must have, at a minimum, access to the same services, social and recreational activities, as do students with the same student status.

If needed, support is provided so students may meaningfully access services, social, and recreational activities. Programs may also provide services that supplement those provided by the institution.

Required for Review

- Indicate the student status of the students in your program. If student status limits access, indicate how it does so.
- Provide a checklist of the institution's services, social, and recreational activities and indicate which ones are accessible to students in the program.
- Provide assurance that students in the program have student identification cards that provide access to all appropriate services, and social and recreational activities.

STUDENT SERVICES STANDARD 6:

Individualized supports are provided to students designed to enable the students to seek and sustain competitive integrated employment (CIE). Supports are provided based on the student's interests and person-centered plan.

Guidance

One of the key goals of college programs for students with ID is to prepare students for employment. This employment, as described in the Workforce Innovation and Opportunity Act (WIOA), is competitive work in integrated settings. Therefore, the supports must be individualized to meet the student's career goals, as indicated in the student's person-centered plan. See the glossary for definitions of WIOA and CIE.

Required for Review

- Provide information about the program's employment preparation/career activities and services.
- Indicate how supports are individualized to meet students' needs and career goals.
- Provide data on employment outcomes for students after program completion.

LENGTH AND STRUCTURE OF PROGRAM STUDY STANDARDS

LENGTH AND STRUCTURE OF PROGRAM OF STUDY STANDARD 1:

The program aligns with the college calendar and specifies the number of weeks of instructional time and the number of clock hours in the program, including the equivalent clock hours that fulfill requirements of the program credential.

Guidance

A clock hour is defined as a period of time consisting of (1) a 50- to 60-minute class, lecture, or recitation in a 60-minute period; (2) a 50- to 60-minute faculty-supervised laboratory, shop training, or internship in a 60-minute period; or (3) 60 minutes of preparation in a correspondence course.

For purposes of determining clock hours, programs for students with ID may count a broad range of activity. Audited courses, individualized instruction to support independent living, meetings with a career adviser, participating in college clubs, or attending campus events with a peer mentor are all things that could count towards the program clock hours. If these activities fulfill requirements of the program credential, they can be counted as clock hours in the program. All activities included in clock hours must have a grading/evaluation process.

Required for Review

- Provide evidence showing that the program's calendar aligns with the institution's calendar.
- Indicate the total number of clock hours in the program, inclusive of all aspects of the program of study, such as college courses, specialized courses, internships and other required learning activities.

LENGTH AND STRUCTURE OF PROGRAM OF STUDY STANDARD 2:

The program clearly describes the educational credential or credentials offered (e.g., degree, certificate, or non-degree credential) that is issued by the institution.

Guidance

The credential(s) must have been approved through a formal process at the institution. In some cases, a credential may be approved through a state agency, commission, licensure board, or industry-recognized credential approval process. In every case, the institution must agree to issue the credential.

Required for Review

- State the name of the credential(s) and whether it is a degree, non-degree, or certificate credential.
- Indicate that the credential(s) has undergone an official approval process at the institution, a state agency, commission, licensure board or industry.

STUDENT COMPLAINTS STANDARDS

STUDENT COMPLAINTS STANDARD 1:

The Program of Study has established relationships with offices within the institution involved with student complaints or discipline, in order to facilitate communication and collaboration.

Guidance

The program has proactively developed ongoing relationships with various campus offices to promote a better understanding of students in the program and to develop plans for collaboration in supporting the students. Working relationships with campus security, the Title IX office and the office that deals with student code of conduct are required. Programs may also wish to work with other offices such as student affairs, residence life, and the legal department.

Required for Review

- Describe the relationships with offices within the institution involved with student complaints or discipline, including campus security, the Title IX office, and student complaint office.
- Share information about any agreements made with these offices or other offices to facilitate support

for students in the program who wish to file a complaint or who have a complaint filed against them, or other relevant concern.

STUDENT COMPLAINTS STANDARD 2:

The institution's grievance procedures are understandable, provided to, and discussed with students in the program and their parents.

Guidance

An accessible (i.e., written at an accessible reading level, uses graphics, explains abstract concepts, etc.) version of the code of conduct, including Title IX requirements, is provided to students and parents or other supporters, if applicable. Program staff review the code of conduct with students, related to both academic rights and responsibilities and expected student behavior in various contexts.

Required for Review

- Accessible version of code of conduct.
- Communication/information dissemination plan for sharing code of conduct with students and parents.

STUDENT COMPLAINTS STANDARD 3:

Support is provided to students who have complaints lodged against them as well as students who seek to lodge a formal written complaint. Support is available throughout the grievance process and throughout any actions that result and if a student is at risk of being expelled or urged to exit the program.

Guidance

Support must be provided for a student when a complaint is filed against a student in the program, when a student files a complaint, or when a student is in danger of being suspended, expelled, or asked to exit a program prior to program completion. Students may request support from/involvement of their parents/designated supporters in complaint procedures. Reasonable accommodations must be provided, as applicable. All due process procedures that are established by the IHE for students involved in complaints must be followed for students in the program, with support as needed.

Required for Review

- Document the procedures the program uses to help the student understand the complaint, and to support the student through the entire grievance process, including facilitating written and oral communication between the student, the family (if the student has signed a FERPA waiver), and the institution.
- Explain the process that is used to provide a clear explanation of the grievance process and assistance provided when a student wants to file a complaint.
- Provide copies of understandable materials regarding grievance procedures that are shared with the student. Documentation must include how written and oral communication is facilitated between the student, the family/parents/designated supporters (if the student has signed a FERPA waiver), and the institution.
- Indicate how information is provided to the student and the parents/designated supporters (if the student has signed a FERPA waiver) when there is a violation or difficulty that could lead to suspension, expulsion, or encouragement to leave the program prior to completion.
- State the procedures followed if a student violates a program rule or institution code of conduct, or is at risk of suspension, expulsion, or early exit for other reasons, such as academic or behavioral difficulties, and what steps are taken to support the student prior to dismissal or encouragement to exit the program.

PROGRAM DEVELOPMENT, PLANNING, AND REVIEW STANDARDS

PROGRAM DEVELOPMENT, PLANNING, AND REVIEW STANDARD 1:

The program, along with key stakeholders, evaluates its program components, student assessment practices, student services, policies, activities, student learning outcomes, and program outcomes at a minimum of every three years. The program implements program revisions based on the evaluation for continuous quality improvement.

Guidance

Program evaluation and continuous program improvement are an important component of quality programs. Administrative and Fiscal Capacity Standard 2 addresses stakeholder input, including input from current and former students and family members. This standard addresses how that input and other ongoing program evaluation is used for continuous improvement.

Required for Review

- Documentation of program evaluation, including stakeholder involvement.
- The date the last program evaluation took place and the schedule for the next evaluations.

PROGRAM DEVELOPMENT, PLANNING, AND REVIEW STANDARD 2:

The institution verifies that students who receive federal financial aid meet the definition of a student with an intellectual disability in the Higher Education Act (HEA) law and regulations.

Guidance

Only students with an intellectual disability may receive federal financial aid under the CTP provisions of the HEA. Institutions provide evidence to accrediting agencies that only students with an intellectual disability receive Title IV aid under the HEA provisions for students with intellectual disabilities. Records must be retained for seven years.

The definition of ID in the HEA is in the glossary. It includes obtaining a record from a local educational agency that the student is or was found eligible for special education services under IDEA. If the educational record does not identify the student as having an intellectual disability, then the institution must obtain documentation as outlined in the HEA regulations and described in Student Services Standard 1.

Required for Review

- Provide documentation that only students with intellectual disability are receiving federal student aid.
- Explain the process used for verification of intellectual disability.
- Indicate where records are stored and for how long the records are retained.

“These standards will be used to validate and strengthen programs and provide guidelines for colleges and universities considering establishing high - quality programs. The model standards will be valuable for institutions of higher education and accrediting agencies, as well as students with ID and their families.”

ACCREDITATION WORKGROUP MEMBERS

WORKGROUP PHOTO AT THE MEETING HELD ON SEPTEMBER 11, 2019



(L-R): Cate Weir, Shedita Alston (U.S. ED), Jon Fansmith, Deborah Amsden Micklos, Meg Grigal, Denise Rozell, Stephanie Smith Lee, Stephan Smith, Carol Britton-Laws, Elise McMillan, Chrisann Schiro-Geist, Wilbert Francis, Madeleine Will, Debra Hart, Tracy Rand
(Not Pictured): David Mank, Rachel Quenemon, Jenni Sandler, Terri Shelton

Stephanie Smith Lee, Chair

Senior Policy Advisor, National Down Syndrome Congress

Stephanie Smith Lee has over thirty years of public policy expertise, including senior Congressional staff positions. Since her daughter, Laura, was born with Down syndrome in 1982, she has led successful disability advocacy efforts at the local, state, and Federal levels. As the Director of the US Office of Special Education Programs, she was responsible for the implementation of IDEA, the federal special education law. As Co-Chair of the Inclusive Higher Education Committee, she led the successful effort to obtain federal financial aid and authorize model programs for postsecondary students with ID. She continues to lead efforts to expand inclusive postsecondary education as IHEC Co-Chair and Senior Policy Advisor for the National Down Syndrome Congress.

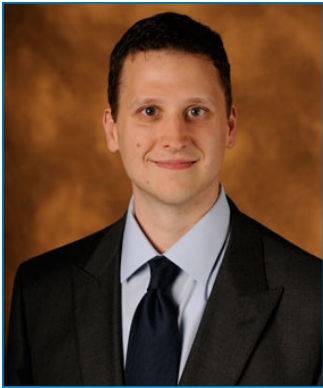


Carol Britton Laws, Ph.D., M.S.W., FAAIDD

Clinical Associate Professor in Disability Studies; Executive Director, Destination Dawgs Inclusive Postsecondary Education; Institute on Human Development and Disability/UCEDD, College of Family and Consumer Sciences, University of Georgia, Athens, GA

Dr. Carol Britton Laws is the Training Director for the Institute on Human Development and Disability where she instructs in, and coordinates, UGA's Disability Studies Certificate program. She is the founding Director of UGA's inclusive postsecondary education program: Destination Dawgs. Prior, she chaired the National Alliance of Direct Support Professionals accreditation and credentialing workgroup where she led the development of accreditation processes for educational programs for direct support professionals. She earned her doctorate in social work from UGA in 2012. She earned her MSW from Rutgers University in non-profit and public administration in 2007. She is a Fellow of the American Association for Intellectual and Developmental Disabilities. She lives in Athens, Georgia.





Jonathan S. Fansmith, M.A.

Director, Government Relations, Division of Government and Public Affairs, American Council on Education (ACE), Washington, DC

Jonathan S. Fansmith represents ACE and its members on matters related to the federal budget and appropriations process, with a particular focus on student aid. He serves on the Executive Committee of the Committee for Education Funding, a 100-member coalition of national education associations, and coordinates the efforts of the Student Aid Alliance, a coalition of over 80 higher education organizations. Fansmith also serves on the board of directors of the Foundation for Education Investment and the advisory board of the National Association of Graduate and Professional Students. Fansmith earned a B.A. in history from Georgetown University and an M.A. in government from The Johns Hopkins University. He held positions in the academic and nonprofit sectors before joining ACE.



Wilbert L. Francis, M.B.A.

Project Director, Open the Doors to College, UCLA Tarjan Center, Los Angeles, CA

Wilbert Francis is a candidate for the Ed.D. in Educational Leadership with a specialization in community college and postsecondary education from San Diego State University. He directs the postsecondary education initiative at UCLA's Tarjan Center. His most recent experiences include consultation to the California Community Colleges Chancellor's Office and training and technical assistance to build the capacity of California's 114 community colleges to support students with intellectual and developmental disabilities. His research includes the identification of factors that contribute to academic success (e.g., persistence, certificate and degree completion, and transfer) and job attainment of individuals with intellectual and developmental disabilities.



Meg Grigal, Ph.D.

Co-Director, Think College; Principal Investigator, National Coordinating Center; Senior Research Fellow, Institute for Community Inclusion, University of Massachusetts Boston, MA

Meg Grigal, Ph.D., is a Senior Research Fellow at the Institute for Community Inclusion at University of Massachusetts Boston and Co-Director of Think College. Dr. Grigal serves as principal investigator on a variety of projects focused on research, policy, and practice in transition and inclusive higher education for people with intellectual disability. She has co-authored three books, a variety of book chapters, journal articles, and research briefs and report. Dr. Grigal's research and training has expanded higher education options for students with intellectual disabilities throughout the US and internationally.



Debra Hart, M.S.

Co-Director, Think College; Co-Principal Investigator, National Coordinating Center; Director, Education and Transition Team, Institute for Community Inclusion, University of Massachusetts Boston, MA

Debra has over 30 years of experience working with youth and adults with disabilities, families, faculty, and professionals that support youth in accessing inclusive secondary and postsecondary education, as well as competitive employment. Since 1997, she has directed 5 federal grants designed to create access to postsecondary education for youth with intellectual disability. Debra has authored many publications on the topics of transition and postsecondary education, including coauthoring Think College: Postsecondary Education Options for Students with Intellectual Disabilities with Meg Grigal.

David Michael Mank, Ph.D.

Professor Emeritus, Indiana University, Bloomington, IN

David Michael Mank, Ph.D., is Professor Emeritus at Indiana University. He is formerly the Director of the Indiana Institute on Disability and Community, Indiana's University Center for Excellence on Disabilities. As a writer and researcher, Dr. Mank has an extensive background in the education and employment for persons with disabilities. He has authored or coauthored dozens of articles and book chapters. His interests also include transition from school to work and community living.



Elise McMillan, J.D.

Co-Director, Vanderbilt Kennedy Center for Excellence in Developmental Disabilities; Director of Community Engagement and Public Policy; Senior Associate, VUMC Department of Psychiatry and Behavioral Sciences

As the Co-Director of the Vanderbilt Kennedy University Center for Excellence in Developmental Disabilities (UCEDD), Elise McMillan has more than 25 years' experience in leading programs and projects that support individuals with intellectual and developmental disabilities, their families, and their communities. She provides leadership on several programs including Tennessee Disability Pathfinder, Tennessee Works Partnership, Next Steps at Vanderbilt and Tennessee's Inclusive Higher Education Alliance. She is an attorney, Senior Associate in the Vanderbilt University Medical Center Department of Psychiatry and Behavioral Sciences, and the past president of The Arc US. She and her husband are the parents of three young adults including a son with Down Syndrome.



Deborah J. Amsden Micklos, M.S., CFCS

Research Coordinator, Center for Research Use in Education, University of Delaware, Newark, DE

Debbie Amsden Micklos has been a family and consumer sciences (FCS) educator, supporting students in transitioning from secondary to postsecondary educational opportunities. She also served as a consultant to the Delaware Department of Education and led the initiative to develop content standards for FCS programs, differentiating classroom activities, and preparing career and technical educators for their role in IEP meetings. She teaches the FCS Methods class at the University of Delaware, preparing FCS teachers to have inclusive classrooms. In her role with Think College, Debbie identifies resources on career competencies that transcend secondary and postsecondary educational experiences in her role on the Student Outcomes Subcommittee.



Rachel Quenemoen

Senior Research Associate, Retired, National Center on Educational Outcomes, University of Minnesota

Rachel Quenemoen is an educational sociologist who is focused on research-to-practice efforts, and specializes in building consensus and capacity among practitioners and policymakers. The broad goal of Ms. Quenemoen's research and technical assistance has been to facilitate educational reform change processes, with the specific goal that students with disabilities are included in and benefit from reform efforts. To that end, she has conducted research and worked alongside practitioners and policymakers to identify feasible yet rigorous approaches that include all students with disabilities in educational opportunities at the local, state, regional, and national levels, in order to improve their lifelong outcomes.





Tracy Rand

Managing Director, Office of Specialized Services, Bergen Community College, Paramus, New Jersey

Tracy has a background in special education and disability advocacy, with over 30 years' experience working with children and adults with disabilities. In addition to her role as Managing Director for Bergen Community College's Disability Services office she is the founding Director for the Turning Point program, an inclusive postsecondary program for students with intellectual disabilities and has served as the Principal Investigator and Project Director for the college's 2010 and 2015 Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) grants.



Denise M. Rozell, J.D.

Director of Policy Innovation, Association of University Centers on Disabilities (AUCD)

Denise Rozell is the Director of Policy Innovation at AUCD working primarily on issues encompassing post-secondary education, transition, employment, health care, long term services and supports, and independent living. Denise has close to thirty years of experience in disability policy at the federal and state level working on almost all issues and legislation affecting individuals with disabilities beginning with the Americans with Disabilities Act. Denise holds a bachelor's degree from Occidental College in Los Angeles and a juris doctorate from the School of Law at the University of California Berkeley.



Jenni Sandler, M.Ed.

Associate Dean, Accessibility Resources, Highline College, Seattle, WA

Jenni Sandler is Associate Dean for Accessibility Resources at Highline College in Seattle, WA. She has been at Highline since 2001 where she has worked with campus and community partners to develop the ACHIEVE Program. Jenni has a Masters Degree in Adult Education from Seattle University where she focused on Universal Design for Learning and higher education coursework and program development for underrepresented adult learners.



Chrisann Schiro-Geist, Ph.D.

Professor and Director, Institute on Disability, University of Memphis, TN

Dr. Schiro-Geist has had several decades of experience as a university faculty member and administrator and has been involved in Specialized Accreditation for most of those years. She has been involved in the Inclusive Post Secondary Education movement since 2011 and served as the Principal Investigator of a Transition Program for Students with Intellectual Disabilities (TPSID) from 2015-2020.

Terri L. Shelton, Ph.D.

Vice Chancellor for Research and Engagement, Carol Jenkins Mattocks Distinguished Professor, University of North Carolina at Greensboro, Greensboro, NC

In her role as UNCG's chief research officer, Dr. Shelton oversees the advancement of research, research administration, research integrity, technology transfer, interdisciplinary, campus-wide research centers, and community and economic engagement. She was part of the team that in 2007 launched UNCG's first, and only 4-year postsecondary certificate program for individuals with intellectual disabilities, Beyond Academics, and continues to be actively involved in its oversight, program improvement, and sustainability. She has received close to \$35 million in contracts and grants and is the author of over 80 publications including *Assessing Attention-Deficit Hyperactivity Disorder* and the monograph, *Family-Centered, Community-Based, Coordinated Care for Children with Special Health Care Needs*.



Stephan Smith

Executive Director, Association on Higher Education and Disability

In addition to serving as the chief staff officer at AHEAD, Stephan Smith has taken on increasingly complex roles in local, state, and national arenas advocating for the total and equitable inclusion of people with disabilities in education and the workplace. Additionally, he serves on numerous national and international advisory boards and executive councils related to people with disabilities, education, employment, transition, social justice, and civil equity. In his role with Think College, Stephan facilitates communication and collaboration between college programs for students with ID and programs that support students with disabilities.



Cate Weir, M.Ed.

Project Coordinator, National Coordinating Center; Program Director, Institute for Community Inclusion, University of Massachusetts Boston, MA

Cate has spent her career working towards the inclusion and full participation of individuals with intellectual disabilities, starting with supporting people to move out of state institutions. She has spent the last fifteen years working to ensure that students with intellectual disability have the opportunity to attend college in states throughout the US. She has served as the project coordinator for the Think College National Coordinating Center since its inception in 2010, where she coordinates all project activities, including technical assistance, training, dissemination, and data collection.



Madeleine Will, M.A.

Co-Founder, Coalition to Promote Self-Determination, Washington DC

Madeleine Will has more than thirty-five years of experience successfully advocating for individuals with intellectual disabilities and their families. Since her adult son, Jonathan, was born with Down syndrome, she has led successful disability policy efforts at the local, state, and federal levels. She served as the Assistant Secretary of the Office of Special Education and Rehabilitative Services under President Reagan, an adjunct professor at Georgetown University, Vice President of the National Down Syndrome Society, and Chair of the President's Committee for People with Intellectual Disabilities. In 2007, Madeleine founded the Collaboration to Promote Self-Determination, a network of national disability organizations pursuing a modern alignment of services, supports, and especially employment for persons with intellectual and developmental disabilities.



In Memoriam

Roberta (Bobbie) L. Derlin, Ph.D.

Associate Provost Emeritus, New Mexico State University,
representing the National Advisory Committee on Institutional
Quality and Integrity (NACIQI)



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GLOSSARY OF TERMS

Access	For purposes of these standards, “access” means full participation with individual supports.
Competitive Integrated Employment (CIE)	<p>From the Workforce Innovation and Opportunity Act (WIOA)</p> <p>The term “competitive integrated employment” has the meaning given the term in section 7 of the Rehabilitation Act of 1973 (29 U.S.C. 705), for individuals with disabilities. (29 U.S.C. §3102 (11))</p> <p>From the Rehabilitation Act of 1973: The term “competitive integrated employment” means work that is performed on a full-time or part-time basis (including self-employment)</p> <p>(A) for which an individual</p> <p>(i) is compensated at a rate that</p> <p>(I)(aa) shall be not less than the higher of the rate specified in section 206(a)(1) of this title or the rate specified in the applicable State or local minimum wage law; and</p> <p>(bb) is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or</p> <p>(II) in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and</p> <p>(ii) is eligible for the level of benefits provided to other employees;</p> <p>(B) that is at a location where the employee interacts with other persons who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and</p> <p>(C) that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.</p> <p>(29. U.S.C. §705 (5))</p>
Comprehensive Transition and Postsecondary Program (CTP)	<p>From the Higher Education Opportunity Act of 2008 (HEOA)</p> <p>(1) Comprehensive transition and postsecondary program for students with intellectual disabilities</p> <p>The term “comprehensive transition and postsecondary program for students with intellectual disabilities” means a degree, certificate, or nondegree program that meets each of the following:</p> <p>(A) Is offered by an institution of higher education.</p> <p>(B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.</p> <p>(C) Includes an advising and curriculum structure.</p> <p>(D) Requires students with intellectual disabilities to participate on not less than a half-time basis as determined by the institution, with such participation focusing on academic components, and occurring through 1 or more of the following activities:</p> <p>(i) Regular enrollment in credit-bearing courses with nondisabled students offered by the institution.</p> <p>(ii) Auditing or participating in courses with nondisabled students offered by the institution for which the student does not receive regular academic credit.</p> <p>(iii) Enrollment in noncredit-bearing, nondegree courses with nondisabled students.</p> <p>(iv) Participation in internships or work-based training in settings with nondisabled individuals.</p> <p>(E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible.</p> <p>(20 U.S.C. §1140 (1))</p>

Developmental disability	<p>From the Developmental Disabilities Assistance and Bill of Rights Act</p> <p>The term “developmental disability” means a severe, chronic disability of an individual that:</p> <ul style="list-style-type: none"> (i) is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) is manifested before the individual attains age 22; (iii) is likely to continue indefinitely; (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity: <ul style="list-style-type: none"> (I) Self-care. (II) Receptive and expressive language. (III) Learning. (IV) Mobility. (V) Self-direction. (VI) Capacity for independent living. (VII) Economic self-sufficiency; <p>and</p> <ul style="list-style-type: none"> (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated. <p>(42 U.S.C. §15002 (8)(A))</p>
Higher Education Act (HEA)	<p>The Higher Education Act of 1965 (HEA; P.L. 89-329) was legislation signed into United States law on November 8, 1965, in order to provide funding to colleges and universities, financial aid to students, and to create a National Teacher Corp. It has been reauthorized eight times, most recently as the Higher Education Opportunity Act of 2008. (HEOA; P.L. 110-315)</p>
Inclusion	<p>From the Developmental Disabilities Assistance and Bill of Rights Act:</p> <p>The term “inclusion”, used with respect to individuals with developmental disabilities, means the acceptance and encouragement of the presence and participation of individuals with developmental disabilities, by individuals without disabilities, in social, educational, work, and community activities, that enables individuals with developmental disabilities to-</p> <ul style="list-style-type: none"> (A) have friendships and relationships with individuals and families of their own choice; (B) live in homes close to community resources, with regular contact with individuals without disabilities in their communities; (C) enjoy full access to and active participation in the same community activities and types of employment as individuals without disabilities; and (D) take full advantage of their integration into the same community resources as individuals without disabilities, living, learning, working, and enjoying life in regular contact with individuals without disabilities. <p>(42 U.S.C. §15002 (15))</p>
Inclusive Program of Study	<p>An “inclusive program of study” refers to the courses, expectations, and requirements needed for program completion. It must meet the HEOA requirements for a Comprehensive Transition Program, including meeting the definition of a student with an intellectual disability. (See Student Services Standard 1.) An individual student’s course of study within the program will be determined through a person-centered plan.</p>

<p>Institution of Higher Education (IHE)</p>	<p>From the Higher Education Opportunity Act of 2008 (HEOA) §1001. General definition of institution of higher education (an) Institution of higher education For purposes of this chapter, other than subchapter IV, the term “institution of higher education” means an educational institution in any State that-</p> <p>(1) admits as regular students only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate, or persons who meet the requirements of section 1091(d) of this title;</p> <p>(2) is legally authorized within such State to provide a program of education beyond secondary education;</p> <p>(3) provides an educational program for which the institution awards a bachelor’s degree or provides not less than a 2-year program that is acceptable for full credit toward such a degree, or awards a degree that is acceptable for admission to a graduate or professional degree program, subject to review and approval by the Secretary;</p> <p>(4) is a public or other nonprofit institution; and</p> <p>(5) is accredited by a nationally recognized accrediting agency or association, or if not so accredited, is an institution that has been granted pre-accreditation status by such an agency or association that has been recognized by the Secretary for the granting of pre-accreditation status, and the Secretary has determined that there is satisfactory assurance that the institution will meet the accreditation standards of such an agency or association within a reasonable time. (20 U.S.C. §1001(a))</p> <p>(b) Additional institutions included For purposes of this chapter, other than subchapter IV, the term “institution of higher education” also includes:-</p> <p>(1) any school that provides not less than a 1-year program of training to prepare students for gainful employment in a recognized occupation and that meets the provision of paragraphs (1), (2), (4), and (5) of subsection (a) of this section; and</p> <p>(2) a public or nonprofit private educational institution in any State that, in lieu of the requirement in subsection (a)(1), admits as regular students individuals-</p> <p>(A) who are beyond the age of compulsory school attendance in the State in which the institution is located; or</p> <p>(B) who will be dually or concurrently enrolled in the institution and a secondary school. (20 U.S.C. §1001(b))</p>
<p>Person-Centered Planning (PCP)</p>	<p>Person-centered planning is used to develop and monitor attainment of student goals based on the student’s vision for their future. The student-focused plan is developed at the beginning of their educational experience and is updated throughout their postsecondary education.</p> <p>Students control who participates in their planning activities and students’ interests, preferences, desires, short and long-term goals are evident in:</p> <ul style="list-style-type: none"> • Course selection • Career development experiences • Campus activities • Social connections • Housing • Student planning involves family input when desired by the student. <p>A student-focused process is used (i.e., STAR, PATH, Lifecourse, etc.) and documented.</p>

Satisfactory Academic Progress (SAP)	<p>Federal definition of SAP: A required measurement of a student’s academic progress towards their academic goal. Progress must be measured by both grade-based (qualitative) and time/pace of completion (quantitative) standards. For programs lasting one year or less, SAP must be assessed at the end of each payment period. For programs lasting more than one year, SAP must be assessed annually (corresponding with the end of a payment period). SAP must be measured cumulatively. For the purposes of these standards, SAP must also address qualitative and quantitative measurement of student progress in the areas of socialization, independent living and career development.</p>
Student with an intellectual disability	<p>From HEOA</p> <p>The term “student with an intellectual disability” means a student-</p> <p>(A) with a cognitive impairment, characterized by significant limitations in-</p> <p>(i) intellectual and cognitive functioning; and</p> <p>(ii) adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and</p> <p>(B) who is currently, or was formerly, eligible for a free appropriate public education under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.]. (20 U.S.C. §1140 (2))</p>
Student with ID not identified in K-12	<p>The HEOA regulations, under Authority: 20 U.S.C. 1088, 1099c, 1141) PART 668—STUDENT ASSISTANCE GENERAL PROVISIONS, §668.233 Student eligibility, describe the responsibility of the institution in determining if the student is, or was, eligible for special education and related services under IDEA, and how to determine if the student has an intellectual disability if the student was not so identified under IDEA:</p> <p>In the discussion section of the regulations, further clarification is provided:</p> <p style="padding-left: 40px;">In the preamble to the NPRM, the Department stated that an institution, as the party responsible for determining students’ eligibility for the Federal Pell, FSEOG, and FWS programs, would be allowed to accept the most recent documentation, even if it is more than a few years old. To further clarify, we do not believe it is appropriate to require in these regulations that the documentation submitted by the student have a minimum or maximum age, as long as the information used is the best available under the circumstances.</p>

Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID)

From HEOA: An institution of higher education (or consortium) receiving a grant... shall use the grant funds to establish a model comprehensive transition and postsecondary program for students with intellectual disabilities (TPSID) that—

(c) The institution obtains a record from a local educational agency that the student is or was eligible for special education and related services under the IDEA. If that record does not identify the student as having an intellectual disability, as described in paragraph (1) of the definition of a student with an intellectual disability in § 668.231, the institution must also obtain documentation establishing that the student has an intellectual disability, such as—

(1) A documented comprehensive and individualized psycho-educational evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional; or (2) A record of the disability from a local or State educational agency, or government agency, such as the Social Security Administration or a vocational rehabilitation agency, that identifies the intellectual disability. (Approved by the Office of Management and Budget under control number 1845-NEW4) (Authority: 20 U.S.C. 109

(d) (1) serves students with intellectual disabilities;

(2) provides individual supports and services for the academic and social inclusion of students with intellectual disabilities in academic courses, extracurricular activities, and other aspects of the institution of higher education's regular postsecondary program;

(3) with respect to the students with intellectual disabilities participating in the model program, provides a focus on-

(A) academic enrichment;

(B) socialization;

(C) independent living skills, including self-advocacy skills; and

(D) integrated work experiences and career skills that lead to gainful employment;

(4) integrates person-centered planning in the development of the course of study for each student with an intellectual disability participating in the model program;

(5) participates with the coordinating center established under section 1140q(b) of this title in the evaluation of the model program;

(6) partners with one or more local educational agencies to support students with intellectual disabilities participating in the model program who are still eligible for special education and related services under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.], including the use of funds available under part B of such Act [20 U.S.C. 1411 et seq.] to support the participation of such students in the model program;

(7) plans for the sustainability of the model program after the end of the grant period; and

(8) creates and offers a meaningful credential for students with intellectual disabilities upon the completion of the model program.

(20 U.S.C. §1140g)

APPENDICES

Appendix A: Acronym Key

Appendix B: Field Test Survey Instructions

Appendix C: List of all TPSID Grantees from October 2010 through 2020

Appendix A: Acronym Key

ABLE Act	Stephen Beck, Jr., Achieving a Better Life Experience Act
ADA	Americans with Disabilities Act
CHEA	Council for Higher Education Accreditation
CIE	Competitive Integrated Employment
CTP	Comprehensive Transition and Postsecondary Program (for students with intellectual disabilities)
E-App	E-application
ED	US Department Of Education
FERPA	Family Educational Rights and Privacy Act
FSA	Federal Student Aid
HEA	Higher Education Act
HEOA	Higher Education Opportunity Act The Higher Education Opportunity Act (HEOA) was enacted on August 14, 2008, and reauthorizes the Higher Education Act of 1965, as amended (HEA)
ID	Intellectual Disability
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
IHE	Institution of Higher Education
IHEC	Inclusive Higher Education Committee
IPSE	Inclusive Postsecondary Education Programs
LEA	Local Education Agency
MOU	Memoranda of Understanding
NACIQI	National Advisory Committee on Institutional Quality and Integrity
NCC	National Coordinating Center
OMB	Office of Management and Budget
OPE	Office of Postsecondary Education in the US Department of Education
OSERS	Office of Special Education and Rehabilitative Services in the US Department of Education
PCP	Person-Centered Plan
Pre-ETS	Pre-Employment Transition Services
RISE Act	Respond, Innovate, Succeed and Empower Act
RSA	Rehabilitation Services Administration
SAP	Satisfactory Academic Progress
SLO	Student Learning Outcomes
SPD	School Participation Division
TPSID	Transition and Postsecondary Education Programs for Students with Intellectual Disabilities
UDL	Universal Design For Learning
VR	Vocational Rehabilitation
WIOA	Workforce Innovation and Opportunity Act

Appendix B: Field Test Survey Instructions

Accreditation Standards Survey Instructions

Thank you so much for your time in completing this survey.

In this field test, you are asked to read each standard and consider whether or not your program meets the standard, and to describe or provide evidence if available.

It is important to remember that the goal of the field test is NOT to evaluate your program, and will not lead to any formal accreditation. Rather, we conduct this field test to evaluate the PROCESS and to collect information that will assist us in developing a clear and usable Accreditation Self Study process with meaningful guidance and model standards.

This survey consists of thirty-seven (37) Model Accreditation Standards in ten areas. Our best estimate at this time is that it will take 8-12 hours to fully complete the survey, including the collection of evidence. You are able to work on it and save your work so that you may complete it in several sessions if necessary.

As a field tester for this survey, you are asked to read each standard and respond to the question “Do you meet this standard?” For some standards, you may be asked additional questions. You are asked to provide evidence of how each standard is addressed within your program, and to make any comments about the standard and what guidance you think would be helpful to accompany the standard. If you have specific recommendations for guidance to accompany a standard, please share it in the comments box. Comments are appreciated, but optional.

Also of note—we offer in this pilot the option to indicate “Not sure/unclear” as a response choice for the question “Does the program meet this standard?” This is an option for the pilot only, to indicate that the standard is unclear or you are unsure how you would be able to ascertain if your program meets the standard. Please offer explanation for that choice in the comments box.

Do not spend an extensive amount of time on any survey item. If you do not know how to answer an item, leave it blank.

Provision of Evidence

There are three ways to provide evidence that your program meets a standard:

1. Insert or describe the evidence in the text box.
2. Upload a Word document or PDF using the file upload feature in the survey. If you upload a document, provide only the relevant information related to the standard.
3. Provide hyperlinks to evidence that can be found online, for example on your program website. If you use this option, be sure to identify specifically where the information may be found at the link location.

Evidence Exceptions for the Field Test

For an actual accreditation process, evidence would be required for every standard. However, for the field test, we ask that you provide what you think is the best evidence you currently have to indicate that your program meets the standard. If providing evidence is extremely time consuming or onerous, you can indicate in the text box what you would provide as evidence under actual accreditation conditions, or let us know that you have no evidence at hand.

Thank you for agreeing to be a field tester in this important process. Your time is very much appreciated and will certainly have an important impact in the development of a viable accreditation process.

Appendix C: List of All Transition and Postsecondary Education Programs for Students With Intellectual Disabilities (TPSID) Grantees and Associated Programs from 2010-2020 (N=125)

AK	University of Alaska Anchorage
AL	Jacksonville State University
AL	University of Alabama
AL	University of South Alabama
AZ	The University of Arizona
AZ	Northern Arizona University
AZ	Coconino Community College
CA	Taft College
CA	UCLA
CA	California State University Fresno
CA	University of California (Davis)
CO	Colorado State University
CO	Front Range Community College
DE	University of Delaware
FL	University of South Florida St. Petersburg
FL	Florida Atlantic University (formerly hosted at Lynn U.)
FL	Florida International University (Panther LIFE and PLUS)
FL	University of Central Florida
FL	Florida State College at Jacksonville
FL	University of Central Florida
FL	Atlantic Technical College
FL	Indian River State College
FL	McFatter Technical College
FL	Tallahassee Community College
GA	Georgia State University
GA	Albany Technical College
GA	Columbus State University
GA	East Georgia State College
GA	University of Georgia
GA	Georgia Southern University
GA	University of West Georgia
HI	University of Hawaii at Manoa
HI	Honolulu Community College
HI	Leeward Community College
HI	Windward Community College
HI	Kapiolani Community College
HI	Maui College
HI	Hilo Community College
HI	Kauai Community College
IA	University of Iowa
IL	University of Illinois
IN	Franklin College
IN	Indiana University
IN	Huntington University
IN	Indiana Wesleyan University
IN	Indiana University Purdue University
IN	Vincennes University at Vincennes
IN	Vincennes University Jasper Campus
IN	Indiana Purdue University Ft. Wayne
KS	University of Kansas
KY	Murray State University
KY	Northern Kentucky University
KY	University of Kentucky
LA	LSU Health Sciences Center
LA	Delgado Community College
MI	Calvin University
MN	Central Lakes College
MN	Ridgewater College
MO	University of Missouri Kansas City
MO	University of Missouri St. Louis
NC	Alamance Community College
NC	Western Carolina University
NC	Central Piedmont Community College
NC	College of Albemarle
NC	Western Piedmont CC
NC	Appalachian State University
ND	Minot State University
NH	University of New Hampshire
NJ	Bergen Community College
NJ	Camden County College
NJ	Bergen Community College
NJ	College of New Jersey
NJ	Georgian Court University
NY	Kingsborough Community College
NY	Keuka College
NY	University of Rochester
NY	Monroe Community College
NY	Roberts Wesleyan College
NY	College of Staten Island
NY	CUNY Borough of Manhattan Community College
NY	Hostos Community College
NY	Queens College
NY	Syracuse University
OH	Kent State University
OH	Marietta College
OH	Ohio State University
OH	University of Cincinnati
OH	Youngstown State University
OH	University of Toledo
OH	Columbus State Community College
OH	Edison State Community College
OR	Portland State University
PA	Mercyhurst University
PA	Millersville University
PA	Penn State Harrisburg
PA	Temple University
PA	Lehigh Carbon Community College
PA	Widener University
PA	Arcadia University
PA	Gwynedd Mercy University
PA	Duquesne University
PA	West Chester University
PA	Lock Haven University
PA	Saint Joseph's University
RI	Rhode Island College
SC	College of Charleston
SC	University of South Carolina
TN	University of Tennessee
TN	Lipscomb University
TN	University of Memphis
TN	Vanderbilt University
TN	East Tennessee State University
TX	Houston Community College
TX	HCC Northwest (Spring Branch)
TX	University of North Texas
TX	Texas A&M University - San Antonio
TX	Texas A&M University
UT	Utah State University
UT	Utah Valley University
VA	Virginia Commonwealth University
VT	Johnson State College
VT	University of Vermont
WA	Highline College
WA	Spokane Community College
WA	Washington State University

