
The journey toward Universal Design for Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland

Introduction

Universal Design for Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland, a report to be launched later in 2017, brings together two years of research and consultation in relation to Universal Design for Learning (UDL) and a review of the provision of reasonable accommodations (RA's) for students with disabilities in Higher Education (HE) in Ireland. There is some misunderstanding of the term UDL amongst academics in particular and many equate UDL with the built environment. There are a number of different terms used in different areas of the literature, and in different geographical regions e.g. inclusive learning approaches or Universal Design for Learning. In this paper, to ensure an understanding of UDL by all stakeholders the term **Inclusive Learning** will be used and is taken to include those terms.

AHEAD in Ireland and the Disability Adviser Working Network (DAWN) set out to review all reasonable accommodations provided in third level education to ensure all were fit for purpose and consistent across the sector. The aims of the project shifted as the work progressed through the stages outlined below. A re-balancing exercise was proposed with the source of support for students with disabilities provided by Higher Education Institutions (HEIs) through mainstreaming and inclusive learning practice wherever possible being identified as a primary goal. The provision of disability supports were identified and defined to meet the needs of those students who cannot be accommodated fully in an inclusive education setting.

There is an increasing emphasis within HEIs on developing inclusive learning practices. This is due to a number of internal and external drivers, including educational policy, anti-discrimination legislation, increased diversity of student populations, and a growing recognition that traditional methods of teaching, learning and assessment require a thorough review. Ensuring that HEIs develop inclusive learning approaches requires a positive engagement in the process from all participants in the HE sector, including statutory bodies such as the Higher Education Authority (HEA) and more specifically lecturers/teachers, teaching and learning developers and access/disability support professionals within HEIs.

Enabling all students, in particular those with disabilities, to participate fully and succeed within HE represents a considerable challenge for all involved. It is fair to say that where teaching, learning and assessment processes become inclusive and transparent, the more likely it is that all students, including those with disabilities, will be able to engage and participate at the highest level. However, even when inclusive learning environments are in place there will always be some students who require extra adaptations to the current arrangements. Reasonable accommodations, for example, have been developed at all levels within the education system to ensure that students with disabilities will not be educationally disadvantaged in comparison to their non-disabled peers. **The report AHEAD and DAWN will launch later in 2017** will allow for a clearer understanding of how inclusive learning practices and the provision of reasonable accommodations can work together to ensure students

with disabilities are accepted as full students of the third level education institution in as an inclusive environment as possible whilst always accommodating students additional disability needs.

Drivers for Inclusive Learning

Equality of opportunity in HE has been a national priority addressed through the work of the HEA in Ireland, and significant progress has been made in widening access and participation for students with disabilities through successive National Access Plans. The HEA reported that the number of students with disabilities to be 6% of the overall student body (HEA, 2015, p. 36). Reasonable accommodations are essential to the retention and progression of this specific student cohort, and should address barriers in all aspects of academic, professional practice and workplace settings.

In December 2015, the National Access Plan 2015 - 2019 announced an overarching objective which observed a need to

ensure that the student body entering, participating in and completing higher education at all levels reflects the diversity and social mix of Ireland's population. (HEA, 2015, p. 14)

Two principles identified in this plan speak directly to how HEI's provide RAs to students with disabilities in higher education:

1. The mainstreaming of equity of access policies within HEIs; and,
2. The impact of funding and student financial supports on participation and completion rates.

Together with continuing reductions in European Social Fund- Fund for Students with Disabilities (ESF-FSD) per-capita allocation to HEIs, future outcomes would suggest a significant increase in students with disabilities requiring RAs with no capacity nationally to increase the overall budget. It seems timely, therefore, to examine the purpose and efficacy of Inclusive Learning and RAs and to consider how these might function within the future landscape of HE.

Stages in developing the proposed Inclusive Learning model

Stage 1: Research

September 2015, **A Review of Reasonable Accommodations for Students with Disabilities in Higher Education in Ireland** (Doyle, 2016), highlighted the need for the following key actions at a macro and a micro level:

1. HEIs to fulfill longstanding recommendations from HEA by committing to a planned programme of Universal Design for Learning.
2. Funding bodies provide greater flexibility in financing reasonable accommodations for students whose status means that they do not meet funding criteria, but whose needs are no less important. This includes students who are pursuing parttime programmes.

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3. Policymakers to acknowledge and respond to the difficulties experienced by HEIs in meeting participation targets without matched funding to support this initiative.

Specific recommendations were made for national guidelines to streamline the process of implementing reasonable accommodations including:

- Evidence of Disability
- Needs Assessment Process and Disclosure
- Documentation for Funding Reasonable Accommodations
- Provision of Human and Technological Support
- Support for Specific Student Cohorts
- Accommodating Work and Professional Placements
- Developing Policies and Guidelines

Stage 2: Constructing the Inclusive Learning Practice Guidelines

Based on the research findings, the AHEAD DAWN Working Group worked collaboratively to develop standards and for allocation of reasonable accommodations for students with disabilities in HE. This led to the development of an Inclusive Learning and Guidelines Report, and the first draft was completed in May 2016.

Stage 3: Reasonable Accommodations Pilot

A field trial in term one of 2016-2017 was carried out with 7 HEIs: Dublin Institute of Technology, Dundalk Institute of Technology, Institute of Technology, Tralee, National University of Ireland, Maynooth, National University of Ireland, Galway, Trinity College Dublin, University College Cork. Participants submitted feedback each month.

Stage 4: Implementation of Inclusive Learning Practice Guidelines

This document outlines the changing roles and responsibilities of all stakeholders and explains the various steps that HEIs should take to implement inclusive learning in all DAWN HEIs. These interim outputs have now been included in the report to be published in 2017.

Theoretical framework: Inclusive Learning

Inclusive learning and teaching in higher education refers to the ways in which pedagogy, curricula and assessment are designed and delivered to engage students in learning that is meaningful, relevant, and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others (Hockings, April 2010).

Inclusive learning practices such as UDL and its principles are recognised by AHEAD, DAWN and the HEA (2015, p. 21) as a model of best practice. They begin with the expectation that the curriculum will be accessed by a diverse group of students, with varying levels of skill and ability. Inclusive Learning approaches provide a set of principles for designing curricula to meet the needs of the greatest number of students, reducing the need for costly and time consuming adaptations at a later stage. Just as an architect considers accessibility when designing a

building to avoid retro-fitting accessibility solutions, course designers can design curricula to reduce the need for future RAs. This would include consideration of the ways in which information is presented, and the means by which students can demonstrate knowledge, skills, and acquisition of learning outcomes.

The National Access Plan 2015 – 2019 (HEA, 2015) commits, through the National Forum for Teaching and Learning, to researching how teaching and related supports for students can be reflected as part of the overall strategy of each institution. The forum is also charged with leading a seminar series to advise on the best academic supports from target access groups (2015, p. 29). The two principles identified in the National Access Plan, detailed earlier, speak directly to a re-examination of reasonable accommodations in HE.

Despite these directives, Inclusive Learning is seldom referred to within HEI strategic plans other than in broad reference to universally accessible campuses. Challenges in meeting these principles have been identified in the research findings, and the literature review, in the report. Fundamentally, decreases in funding to support the needs of students with disabilities together with an increase in participation rates, means that a focus on Inclusive Learning is now essential (AHEAD, 2015). Adopting this strategy makes economic sense and would permit Disability Service Offices to focus on solutions to support students with complex needs.

The role of Disability Service staff in Higher Education might be usefully focused on assisting and supporting institutional centres of teaching and learning, to introduce and implement the principles of Inclusive Learning in all aspects of course design and delivery.

A whole HEI approach is required to ensure that students with disabilities have equal access to the full range of services and facilities in the institution. Incorporating the principles of Inclusive Learning into all aspects of the institution will meet a wide diversity of needs and will accommodate the vast majority of students. There are instances, however, when a student's needs cannot be accommodated through mainstreamed services and individual supports and interventions must be provided to facilitate the students' participation.

In preparation – the Trinity Inclusive Curriculum (TIC Project)

To support the move to a changing pedagogy, in October 2008, the Trinity Inclusive Curriculum (TIC) project commenced with HEA Strategic Innovation Funding for 3 years, with the aim of responding to the increasing diversity of the student population through the promotion of appropriate inclusive practices.

The term 'Curriculum' has caused challenges as there is no single definition of the concept and this has led to misunderstandings regarding the scope of the project. Often curriculum is defined as 'what the individual teaches' (i.e. the content of a programme). Fraser and Bosanquet (2006) note two curriculum orientations, product orientation (content) and process orientation. TIC follows the process orientation, using Fraser and Bosanquet's definition C of curriculum as 'the students' experience of learning', where the lecturer (and the institution as a whole) provides a framework for learning that responds to students' needs to create an effective learning environment for all students.

Inclusive practices follow the principles of UDL to respond to the needs of all learners within a community. TIC has developed a series of innovative resources for use by teaching staff both within Trinity College Dublin and externally, including a resource website collating good practice guidelines for inclusive teaching and assessment,

and an online tool comprising self-evaluation questionnaires aimed at lecturers (and other teaching staff, e.g. teaching assistants).

While TIC has generally been favourably received, there is a reluctance, particularly at school and institution level as distinct from individual level, to have it formally embedded into HEI practice. An analysis of the TIC programme indicated that, whilst those closely associated with the project found themselves evolving towards a continuous spectrum view of the student body, Schools and the overall institution were still leaning on a traditional/nontraditional distinction. Such a distinction, it has been argued, is the root cause of the difficulties associated with embedding.

The Benefits of Inclusive Learning

The expectation that the curriculum will be designed to be sufficiently variable to be accessed by a diverse group of students, with varying levels of skill and ability. Inclusive Learning provides a set of principles for designing curricula to meet the needs of the greatest number of students. It brings considerable benefits to the institution such as:

- Improved teaching, learning and assessment
- Increased student satisfaction
- Cost and time efficiency
- Clarity of programme objectives and deliverables
- Increased employment outcomes
- Improved student recruitment and retention
- Assurance and accountability
- Flexible for taught courses, e-learning, research
- Reputational benefit
- International best practice embedded

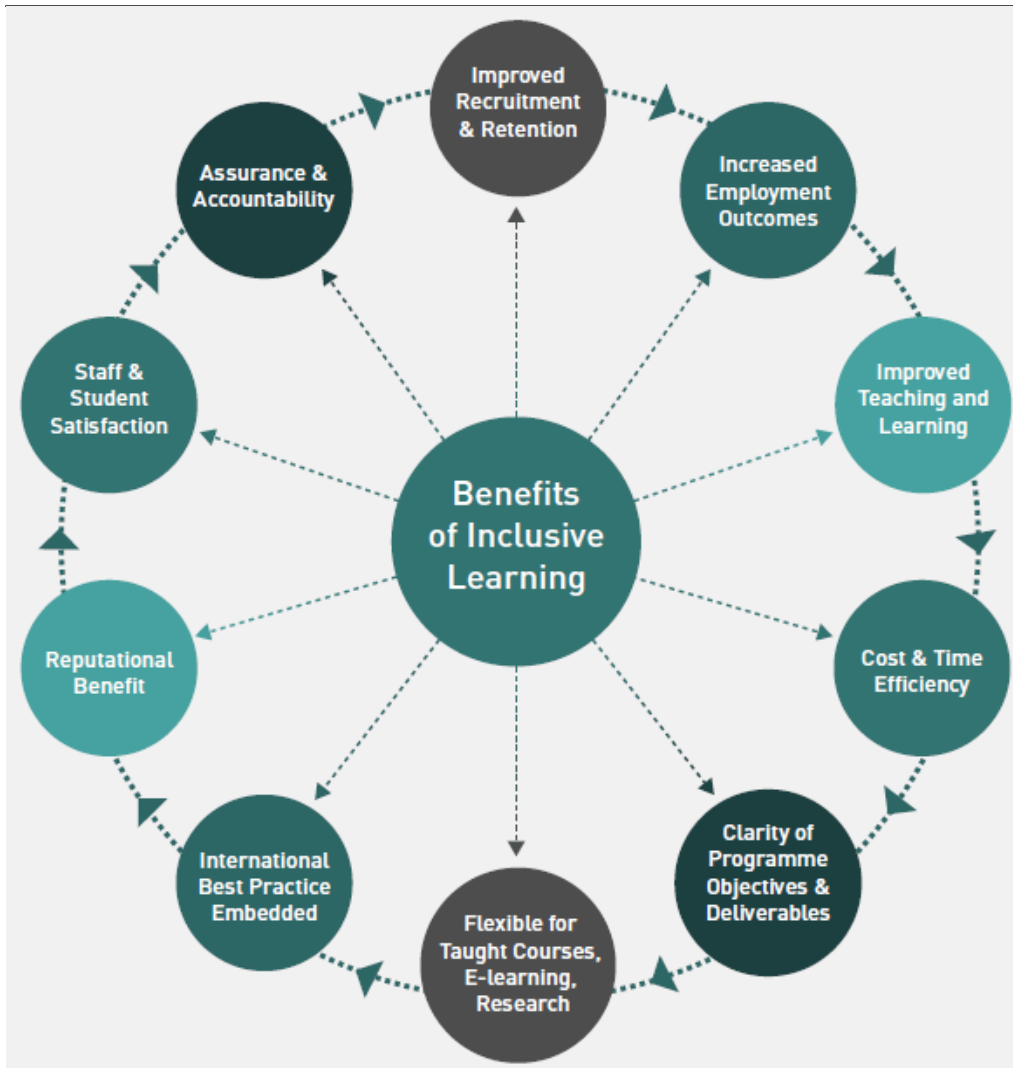


Figure 1: Benefits of an

inclusive approach to teaching, learning, and assessment

Benefits of Inclusive Learning

- Improved Recruitment & Retention
- Increased Employment Outcomes
- Improved Teaching and Learning
- Cost & Time Efficiency
- Clarity of Programme Objectives & Deliverables
- Flexible for Taught Courses, E-learning, Research
- International Best Practice Embedded
- Reputational Benefit
- Staff & Student Satisfaction
- Assurance & Accountability

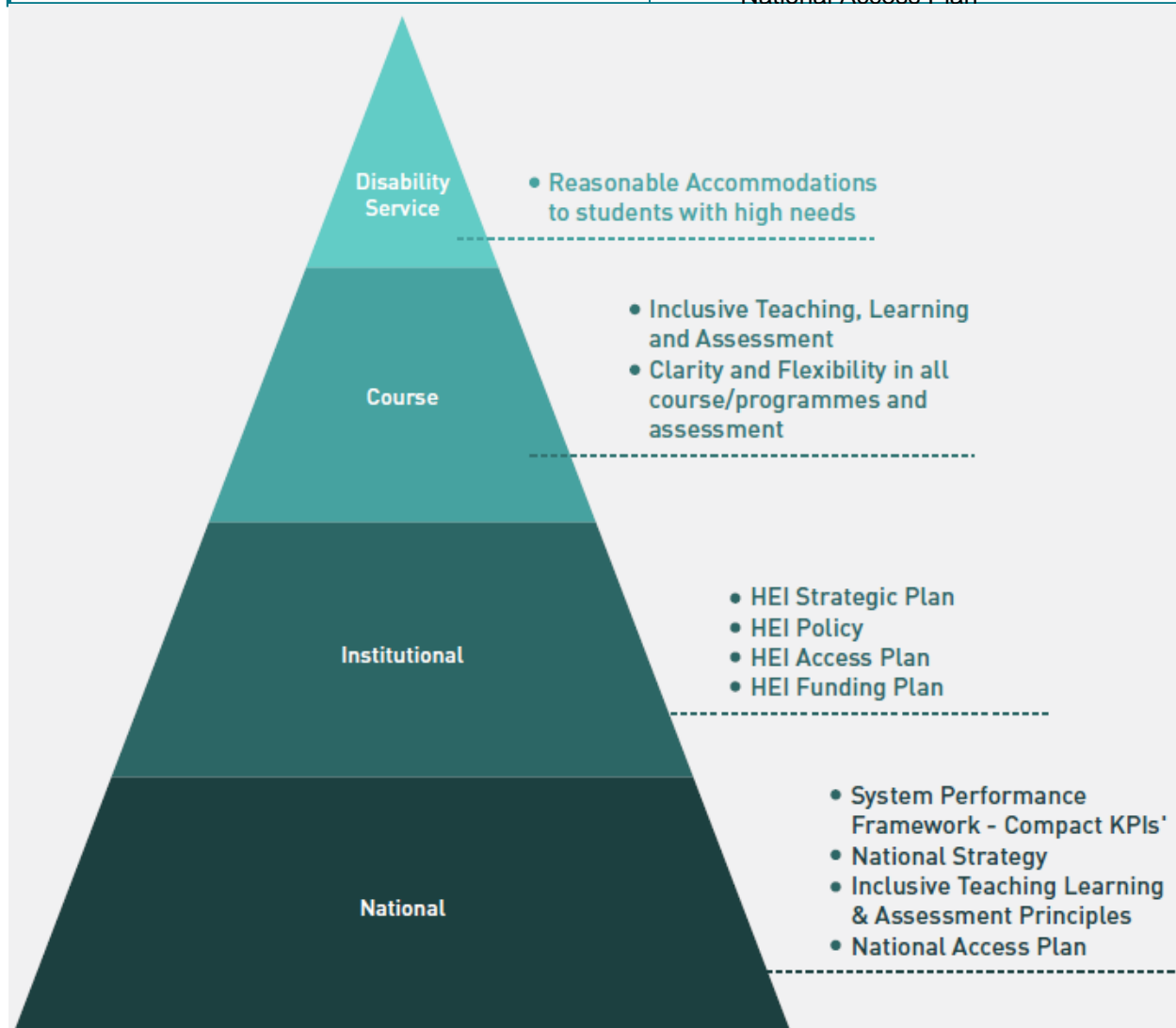
The benefits of an inclusive approach in figure 1 are taken from the final report of the Trinity Inclusive Curriculum (2012) and UK Government report, Inclusive Teaching and Learning in Higher Education as a route to Excellence January 2017.

HEIs may evidence their commitment to an inclusive approach to teaching learning and assessment in a variety of ways. A model for implementing the transition to UDL practices is provided in the following section.

Proposed Model of Inclusive Learning

AHEAD and DAWN proposes a model of inclusive learning practice (Figure 1), informed by discussions with the HE sector, to illustrate how HEIs should organise and deliver provision for all students with disabilities.

Disability Service	Reasonable Accommodations to students with high needs
Course	<ul style="list-style-type: none"> • Inclusive Teaching, Learning and Assessment • Clarity and Flexibility in all course/programmes and assessment
Institutional	<ul style="list-style-type: none"> • HEI Strategic Plan • HEI Policy • HEI Access Plan • HEI Funding Plan
National	<ul style="list-style-type: none"> • System Performance Framework - Compact KPIs' • National Strategy • Inclusive Teaching Learning & Assessment Principles • National Access Plan



Figure

2: Proposed model of inclusive practice in HE in Ireland.

This model allows for a whole HEI response to inclusive practice as outlined in the HEA National Access Plan. Working at three distinct levels, its purpose is to ensure that all stakeholders are identified, the key areas that they need to work upon are outlined, and suggestions on inclusive practice are explained.

National / HEA Level

As already identified, the National Access Plan 2015 - 2019 announced an overarching vision on equity, diversity and funding arrangements.

Together with the on-going review ESF-FSD allocation to HEIs, future outcomes would suggest a significant increase in students with disabilities requiring inclusive learning strategies and RAs, juxtaposed with a significant decrease in the financial wherewithal to do so. It seems timely, therefore, that the HEA prioritise these objectives and to examine the purpose and efficacy of Inclusive Learning and RAs and to consider how these might function within the future landscape of HE. Through the System Performance Framework and other funding measures within the HEA, they need to act as an influencer to ensure changes lead to a more inclusive learning environment.

HE Institutional level

The benefits for HEIs in developing and embedding a comprehensive approach to inclusive practice can be significant, making a long and lasting difference to opportunities for students with disabilities and for HEIs. There is a need for strong, effective and committed leadership, with the pace of progress determined by the level of engagement and leadership provided by senior teams. They must drive and deliver change to address the many and varied extrinsic and intrinsic barriers faced by students with disabilities.

Course level

It is increasingly recognised that it is inequitable and unsustainable to support students through provision of specialist supports that sit outside mainstream provision.

The HEA emphasises the need to implement more inclusive and integrated approaches in the National Access Plan 2015- 19, and specifically state that 'equity of access policies should be mainstreamed into the everyday life of higher education institutions to enhance the quality of the learning experience and progression outcomes for all students'. (p. 18)

The challenge of designing educational environments that are open to all students and in which all students can participate, is a complex one. This requires the design of curricula, teaching practices, assessment methods, services and physical environments that can accommodate the range of needs within a diverse student body. Goal 1.5 of the National Access Plan 2015 - 2019 is to mainstream the delivery of equity of access in HEIs to 'enhance the quality of the learning experience and progression outcomes for students' (HEA, 2015, p. 26). A diversified student body leads to diversified student teaching, learning and assessment needs. Implementing inclusive practices should represent the first line of accessibility rather than the application of specialist supports, reasonable accommodations, and retroactive strategies to overcome barriers found within traditional teaching and learning methodologies.

Disability Support level

The role of Disability Service staff in HE clearly sits in the provision of RAs to students with disabilities who seek support whilst in HE. The pyramid approach shows clearly that Disability Service staff should work at the apex providing specialist supports to the few students who require them. Most students in an inclusive learning educational environment will be able to manage their education, once inclusive practices are thought through and implemented. This will enhance their educational experience.

Disability Service staff are responsible for promoting inclusive practices, and should provide guidance on what these are, and who should provide them. Provision of RAs is based upon an assessment of need, the over-arching tenet of which is personcentered planning (AHEAD, 2012; Ritchie, Sanderson, Kilbane, & Routledge, 2003). It is essential, therefore, that guidelines adhere to this principle, and recognise the individuality of reasonable accommodations.

The Universal Design for Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland report identifies a way forward and comprises three parts:

Part 1 of this report establishes the rationale for adopting a Universal Design for Learning (UDL) Model of higher education in Ireland. Higher Education has changed dramatically over the past ten years in particular in terms of its student profile. There is now a significant diversity of students participating with over 40% of students from a non-traditional background including a continuing increase in the number of students with disabilities.

As part of this profile students with disabilities constitute 5.2% of the total student population in 2015/16, (AHEAD 2017) a participation rate that has doubled in the last 5 years.

This change has taken place at a time of significant decreases in funding available to HEIs to support the change management initiative required if this diverse student is to have a quality experience in higher education. The report proposes that the sector consider a model of Inclusive Learning as a solution to the inclusion of all students and makes a commitment to engaging with the necessary change initiative. An Inclusive Learning model involves the entire college. This involves all faculties, mainstream teaching, study supports and other functions working collaboratively and in a connected way with disability support services to improve the experience of all students.

As an interim step towards an Inclusive Learning model, the report envisages a system of integrated supports within HEIs which incorporate good mainstream teaching and learning practices for inclusion; mainstream study supports; the reasonable accommodations made available through Disability Support Services and supports available through other functions such as Careers. The report is backed up with accompanying guidelines for the provision of reasonable accommodations through disability Support and was developed in collaboration with DAWN HEI members and AHEAD.

Part 2 includes comprehensive guidelines on implementing Inclusive Learning at a national, institutional, course and Disability Service level, together with examples of good practice such as the Trinity Inclusive Curriculum (TIC) Project, and HEI case studies. This model is aligned with Universal Design for Learning and endorsed within the National Access strategic plans regarding teaching & learning policies. It sets out inclusivity in four key areas:

- the physical environment,
- academic skills and support for student learning

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- technology
 - student services.

A number of high level recommendations are made that will allow for Inclusive Learning principles and practices to be integrated in all HEI's, these are:

- The HEIs should adopt and develop an inclusive/ mainstreaming systematic approach to widening participation, equality and diversity, and improve student retention and success through a series of inclusive change programmes and associated research, publications and events.
- The System Performance Framework subscribed to by all HEIs should underpin the Equality of Access agenda through a clear description of indicators and evidence of inclusive teaching and learning indicators of good practice.
- HEI Access Plans & ESF FSD Service Plans should show clear plan for mainstreaming of teaching, learning and assessment supports, development of an infrastructure that will ensure HEI wide approach is taken.
- Review of the Access Allocation in the Recurrent Grant Funding Model needs to take account of any changes in the ESF FSD and data used to determine HEI allocations.
- The Taskforce responsible for the design, development and implementation of a new model for allocating ESF FSD funding should refer to this report for guidance on changes required to allow for improved efficiencies in allocation of funding and mainstreaming of some disability activities in all HEI's.

Specific guidelines are provided for implementing inclusive teaching, learning, study supports and assessment practices in all aspects of the curriculum and curriculum delivery, including work placements. Consideration is also given to confidentiality and disclosure, support to Erasmus and international students, and streamlined procedures for registering and assessing the needs of students with disabilities, across all HEIs.

Part 3 of the report sets out detailed guidance on the mainstreaming of supports, and provision of individual reasonable accommodations where this is not possible. Template forms and policies are provided to support staff and to ensure endure that procedures are streamlined across all DAWN HEIs.

Conclusion

Inclusive Learning principles are fairly new concepts in higher education. Inclusive learning at its simplest is good practice in teaching, learning and assessment for all students. This means that we have to change how we think about educational practice in order to give all students the same opportunities to learn. A shift away from thinking of inclusive learning as being a disability issue to a more inclusive teaching, learning and assessment environment will be required. There is in place a strategic framework of policy and quality standards within HEIs, the challenge now is to deliver on these policies and to ensure that inclusive learning practices are embedded across the whole institution.

The HEA play a key leadership role in actively encouraging the development of an inclusive/ mainstreaming approach to inclusion. This can happen effectively through the framework of performance compacts and engaging in further dialogue with the stakeholder groups to identify key indicators of minimum practice to be embedded in mainstream functions across the entire institution. Such a change requires leadership, vision and management to be sustainable and requires the commitment of senior management within HEIs to not only promote the vision of

inclusive practice but to embed it with quality systems that are monitored. The report **Universal Design for Learning and the Provision of Reasonable Accommodations to Students with Disabilities in Higher Education in Ireland 2017**, shortly to be published, will assist a range of professionals involved in bringing about these changes.

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