

Compliance Isn't Enough: Examining University Accommodation Processes in Light of ADA Title II/Section 504 Toward Intentional Student Support

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Abstract

This practice paper presents a synthesis of university web-published accommodation processes into three prototypes with evaluation of their alignment with the Americans with Disabilities Act (ADA) Title II/Section 504. Based on the findings, a concise website checklist is provided to support accessible implementation in engineering programs. Accommodation processes shape the learning experience of disabled engineering students and influence how they view themselves as engineers. In this paper, we examine the types of formal accommodations offered by US universities, assess the extent to which information is publicly accessible, and evaluate alignment with Title II of the ADA as amended and Section 504 of the Rehabilitation Act of 1973 as amended. Using an exploratory content analysis approach, we analyzed disability services webpages from 25 institutions nationwide and inductively identified recurring configurations of the processes that emerged from those webpages. Overall, three accommodation process prototypes, each indicating varying levels of student responsibility and differences in organizational approach and transparency, were identified: (1) Student-Driven Manual, which asks students to self-advocate and connect accommodations with courses and instructors; (2) Institutional Portal-Based, which uses a university portal to streamline requests, status, and guidelines; and (3) Pre-Approval Interactive, which includes multiple meetings with service staff to ensure a comprehensive review before approving accommodations. These web-published steps were then evaluated against ADA Title II (§35.130, §35.160) and Section 504 (§104.44, §104.4). While initial steps for implementing accommodations were often visible on public pages, other aspects, including differing timelines and varying visibility of collaboration among students, disability services, and faculty raise questions about whether posted processes and policies meet the spirit of federal mandates.

Introduction

Many institutions describe disability access as a shared responsibility, yet in practice students often carry the burden of deciding when to disclose, how to request support, and how to navigate each step. Barriers such as identity concerns, limited information, and negative experiences with faculty can reduce students' use of disability services and accommodations [1]. Disability services websites are often the first place that students (and faculty) look for process expectations, but prior work shows that what is publicly posted online varies substantially across institutions. A survey of 118 disability services sites found differences in how offices describe documentation, eligibility, and basic procedures for receiving accommodations [2]. A larger website review focused on experiential learning found that information on accommodations for activities outside classrooms was often missing or incomplete [3]. Together, these researchers found inconsistent process guidance posted publicly across institutions.

This inconsistency matters in engineering. Engineering courses often include high stakes assessments, teamwork, labs, and strong expectations about professional performance. Accommodations are intended to protect equal access to and opportunities for learning and

assessment, yet requesting them can feel like a burden in engineering settings where students may seek acceptance and full participation [4], [5]. In a recent engineering education study, researchers examined student attitudes and perceived norms toward disability and accommodations [6]. The researchers found more negative attitudes related to disability acceptance and disability disclosure. Examining the qualitative findings, these researchers uncovered concerns about being perceived as faking a disability and reluctance to disclose disability, which may help explain why some students hesitate to seek support in engineering settings.

In this practice paper, we focus on what institutions communicate about the accommodation process through the information published on public web pages. We synthesize accommodation process information from 25 U.S. institutions, describe three recurring process prototypes based on step order and role visibility, and identify gaps that can create uncertainty for students and faculty. One gap is the limited visibility of time expectations across steps, which can make planning difficult for students. These differences in what institutions make publicly available are not merely matters of website style; the availability shapes how clearly students and faculty understand, anticipate, and coordinate the accommodation process.

ADA Title II, as amended in 2008, and Section 504 of the Rehabilitation Act of 1973, as amended through the Workforce Innovation and Opportunity Act of 2014, provide the policy lens for interpreting what is presented on websites. Title II applies to public entities and addresses nondiscrimination and effective communication duties in programs and services [7]. Section 504 applies to recipients of federal financial assistance and addresses equal access to and opportunities in public spaces and nondiscrimination and academic adjustments for qualified students [8]. We do not claim legal compliance based only on websites; instead, we assessed whether posted steps show visible alignment with key expectations that are relevant to access and fair and equal process and opportunities. We also contribute a short website checklist designed for disability services and academic units that highlights process elements that should be easy to find and understand, with guidance on steps, role responsibilities, and time expectations.

Literature Review

Accommodation processes in higher education are shaped by more than written policies; they depend on how students interpret eligibility, decide whether to disclose, and initiate requests, as well as how disability services and faculty respond across multiple steps and settings [1], [9], [10], [11]. Researchers have found institutional practices vary in how students enter the system and what happens after intake, including differences in how requests are routed, what information is required, and how roles are communicated to students and instructors [12], [13]. These differences shape what students can understand about the accommodations process and how clearly expectations are communicated before they ever contact a disability resource office.

Researchers examining institutional websites have found that public process guidance varies. For instance, researchers reported variation in how offices describe documentation, eligibility, and basic procedures. They also reported many sites did not include information that could help students understand prior school plans and transition materials [2]. Researchers also identified differences in the accessibility of process information through site structures [14]. In a larger

website review, researchers focused on experiential learning and reported that information about accommodations for activities outside classrooms was often missing or inconsistent across institutions and identified gaps in how processes were communicated across settings [3]. Together, this body of work supports the treatment of webpages as an important object of analysis because online infrastructure and public information access shape what users find and do [2], [3], [14].

Engineering adds an important context for interpreting why visibility and role clarity may be especially consequential. Engineering programs are often characterized by rigorous performance expectations that can heighten concerns about competence, professionalism, and sense of belonging [4], [5]. In such environments, students may weigh the benefits of accommodations against social and academic risks, and they may avoid requests if they anticipate stigma or believe that asking for accommodations will be seen as not fitting engineering norms [6], [15]. As a result, the same website ambiguity that might be inconvenient elsewhere can become another barrier in engineering, where students may need clear, process-level reassurance about steps, timelines, and responsibilities to feel confident initiating requests and following through to implementation.

The analysis presented in this paper focuses on policy expectations most relevant to how accommodation processes are communicated and carried out. The Americans with Disabilities Act (ADA) Title II emphasizes nondiscrimination in program administration (§35.130) and effective communication duties (§35.160); under Section 504, it emphasizes nondiscrimination (§104.4) and academic adjustments in postsecondary education (§104.44) [7], [8]. These provisions provide concrete criteria for interpreting which process elements should be visible and actionable not only for students but also for faculty, administrators, and other university staff.

Implementation is where these policy expectations are enacted, even after approval. The effectiveness of accommodations depends on timely coordination, clear communication, and consistent follow-through across disability services and instructors [16], [17]. Breakdowns often occur during handoffs—such as when students must deliver letters, discuss implementation details with instructors, or apply accommodations in specific courses or course activities—especially when webpages do not make steps, roles, and timelines visible [18], [19], [20]. In short, website visibility matters because it reduces ambiguity about what happens next and who is responsible.

Methods

In this study, we used an inductive qualitative content analysis of university accommodation websites to examine how disability services present accommodation process information on public webpages and resource documents. To guide our work, we asked the following research questions:

1. How do public disability services web pages present the accommodation process in terms of core steps and key roles?
2. To what extent do the posted steps show visible alignment with ADA Title II (§35.130, §35.160) and Section 504 (§104.4, §104.44), based on publicly available web page content?

The dataset included 25 U.S. institutions with active disability services websites. These institutions span multiple states and reflect variation in institutional context, including community colleges, public universities, and private universities. These 25 institutions were drawn from the institutional set described as part of a broader National Science Foundation-funded CAREER project, Innovation for Inclusion (I²), exploring accessible ecosystems for engineering students with disabilities in higher education (Award No. 2340778). *Figure 1* shows the geographic distribution of the sampled institutions across U.S. states. Institutions were de-identified to maintain the analytic focus on recurring process patterns rather than institution-by-institution comparison.

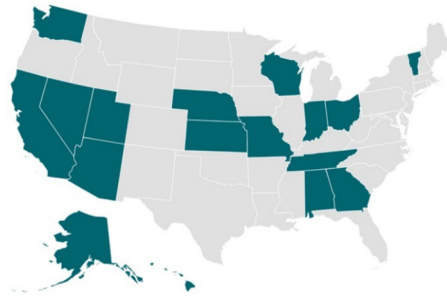


Figure 1. Geographic distribution of the 25 sampled institutions across U.S. states.

To scope the content analysis, we examined the main webpage that presented the accommodation process and any subpages and documents linked from it. Because many sites did not present the full workflow in one place, the process was inferred through a synthesis of distributed process cues across pages and attached files [21]. Linked guidance documents were included when they contained additional steps or requirements not stated on the pages [21]. The analysis therefore examined publicly available representations of the accommodation process rather than verifying internal practices beyond what institutions made visible online.

Website search and data capture

For each institution, one member of the research team began at the disability services landing page and navigated to the main process page. Internal links from the main process page were then followed to identify subpages that contained additional process information. Copies of the relevant pages and linked documents were saved and recorded where key process cues appeared across the site. During review, several key sources of information were recorded such as the ordering of publicly stated steps and associated timelines and the nature by which communication frequency, type, and responsibility were presented for students, disability services staff, and faculty [21].

Analytic procedure

Using an inductive content analysis approach, we compared synthesized process cues across institutions to identify recurring patterns in how the accommodation process was presented [22]. Prototype development focused on the ordering of major actions, the process for initiating accommodation requests as emphasized on the site, and how stakeholder roles were made visible. Through iterative comparison, three prototypes were synthesized and represented as flowcharts reflecting the most common sequence of actions and role cues in posted materials.

Because some institutions combined features across prototypes, hybrid cases were documented and categorized based on the clearest step sequence that could be inferred from the webpages. These prototypes are further discussed in the Findings section.

After the prototypes were established, we interpreted the visible features of each prototype using ADA Title II and Section 504 as a policy lens. This mapping technique focused our analysis on the alignment of each prototype with the Title II nondiscrimination in program administration (§35.130) and effective communication duties (§35.160), and Section 504 nondiscrimination (§104.4) and academic adjustments in postsecondary education (§104.44) [7], [8]. Guided by established content analysis procedures [21], [22], we identified which prototype features appeared to support these expectations and which features appeared to create gaps in public process communication, based on what was visible in posted materials [23]. This analytic step produced prototype-level observations reported in the findings, including how request mechanisms and role-visibility patterns may support or constrain effective communication and equitable access in practice.

Transparency and analytic consistency

Website review, extraction, and coding were conducted by one member of the research team. To support transparency, that researcher maintained structured notes and saved page copies that linked synthesized steps and policy mapping notes to source webpages or linked documents, consistent with guidance for document analysis and qualitative content analysis reporting [21], [22].

Findings

Prototype synthesis

Across 25 U.S. institutions, three recurring prototypes captured how accommodation processes were presented through public webpages and linked guidance documents: Student-Driven Manual - Type 1 (n = 6), Institutional Portal-Based - Type 2 (n = 11), and Pre-Approval Interactive -Type 3 (n = 2). A final category, Hybrid (n = 6) was identified when an institution's posted materials blended features across the other three prototypes. A summary table of prototype assignments across the 25 institutions, referenced using identified labels (I01–I25), is provided in Appendix A.

Student-Driven Manual - Type 1: This accommodation prototype foregrounds student responsibility and self-advocacy throughout the accommodations process. Public materials often frame the workflow as a sequence of student-initiated actions, followed by approval and course-level follow through that students must manage each term. A key strength of this presentation is that it can make student actions visible and concrete, especially when the website lists clear steps and artifacts such as forms and accommodation letters. However, the workflow can appear manual and coordination heavy, particularly when websites provide few cues about timing and limited guidance for how instructors and staff coordinate implementation after approval.

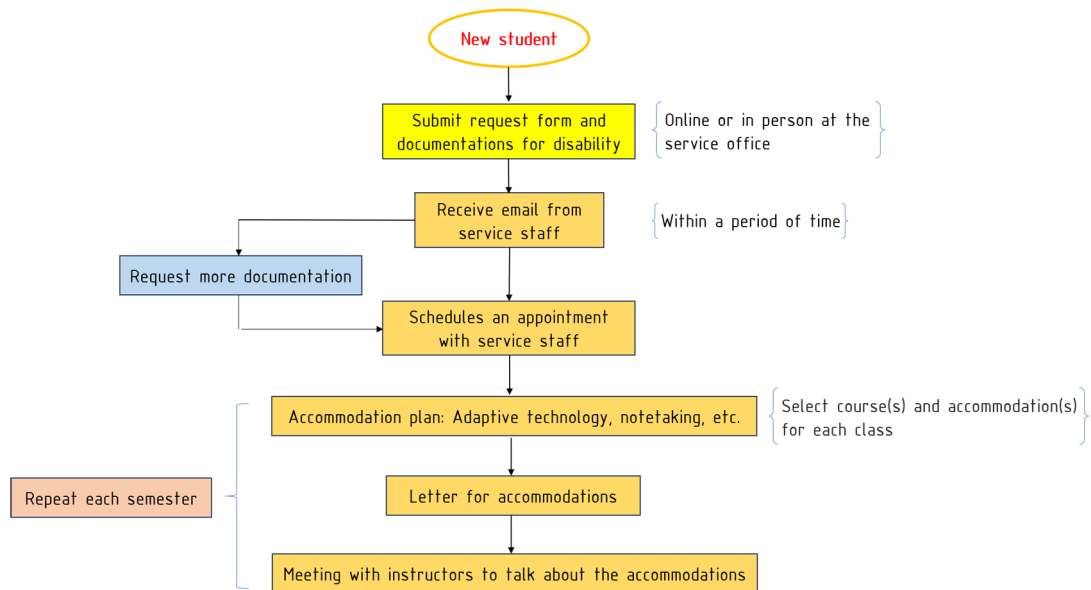


Figure 2. Student-Driven Manual (Type 1)

Institutional Portal-Based - Type 2: This accommodation prototype emphasizes an online system as a central mechanism for initiating requests and managing accommodations. Key strengths of this presentation are increased anonymity, reduced potential stigma, particularly for students initiating first-time requests, and greater continuity of accommodation offerings and implementation across courses and terms. However, the degree of public detail provided on websites tends to vary across institutions. In many cases, websites will highlight the existence of a system but provide limited visibility into intermediate steps, communication pathways/accessing the system, or what students and instructors should expect after submitting a request in the system.

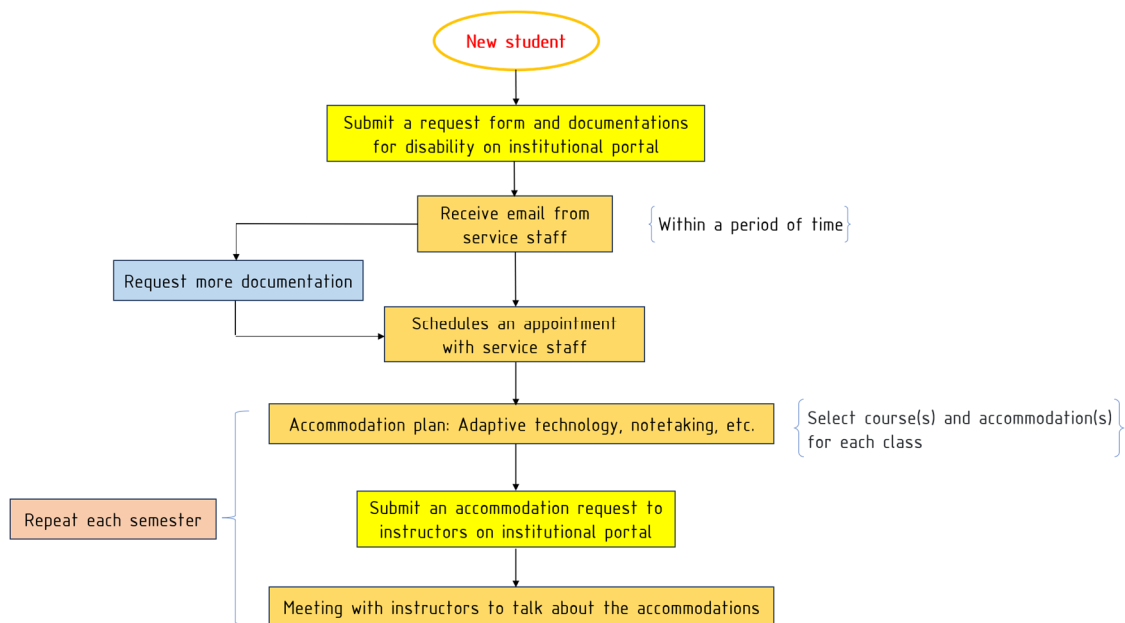


Figure 3. Institutional Portal-Based (Type 2)

Pre-Approval Interactive - Type 3: This accommodation prototype emphasizes multiple interactions with service staff prior to approval. A strength of this presentation is that staff involvement is made visible through repeated touchpoints that suggest individualized review and clarification. At the same time, websites do not consistently make timelines, post-approval implementation steps, or faculty-facing guidance equally visible within the same process narrative.

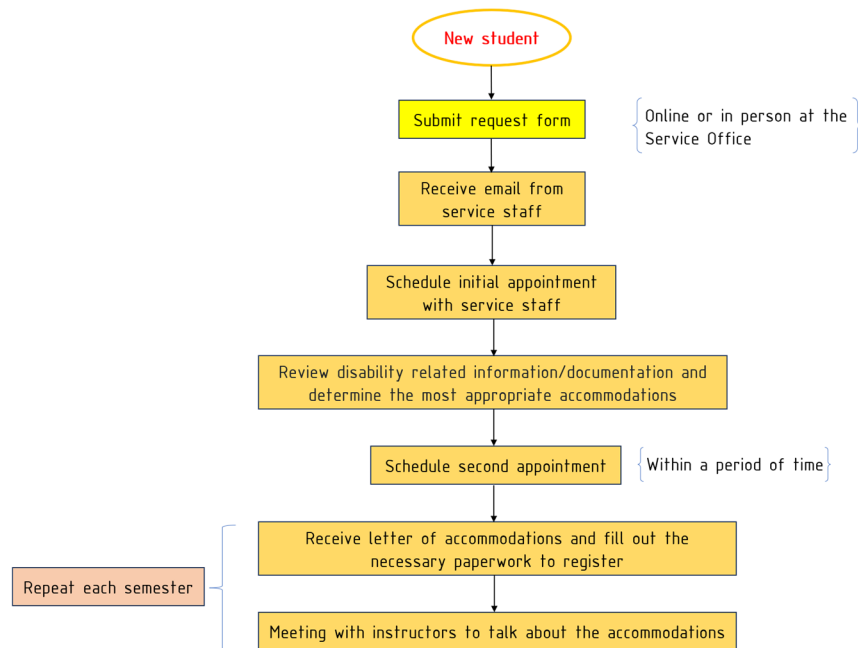


Figure 4. Pre-Approval Interactive (Type 3)

Hybrid presentations: This accommodation prototype combines features across the three previously-described prototypes rather than aligning cleanly with one type. These cases blend system-based request elements with manual implementation cues, or combine meeting-based review cues with system-based management cues. Hybrid cases were documented and categorized based on the clearest step sequence that could be inferred from the website and corresponding linked documents.

Policy lens interpretation: Themes in what websites make visible

The three prototypes indicate that disability services websites do more than describe procedures; they also influence what is made visible, what remains less clear, and how coordination is expected to occur across roles. Using ADA Title II and Section 504 as an interpretive lens, we identified the following themes that indicate to what extent a posted process reflects the spirit of these federal policies and to identify areas for improved communication and access.

Theme 1: Entry points are usually visible, but the pathway is not equally transparent (§35.130; §104.4)

Across prototypes, most institutions provide a visible way to start the process, such as a form, a system-based request option, or instructions to contact disability services. These entry points make access mechanisms visible, which aligns with nondiscrimination expectations in Title II

and Section 504 (§35.130; §104.4) [7], [8]. However, transparency about what happens after the first step varies by prototype. Type 2 often highlights a centralized system that can streamline entry, yet intermediate steps are not always explained in publicly available text. Type 1 more often presents concrete student actions across the term, but the pathway appears to depend on student follow up. Type 3 makes staff involvement visible through repeated interactions before approval, which can support the spirit of nondiscrimination in program administration (§35.130) by signaling individualized consideration rather than a one-step decision [7]. However, the information available on the websites does not consistently make downstream steps equally transparent, which can leave students feeling uncertain about what happens with their accommodations after initial interaction.

Theme 2: Communication handoffs across roles are under-specified on public webpages (§35.160)

Title II includes effective communication duties that matter when websites serve as a public-facing channel for process information (§35.160) [7]. Across prototypes, student-facing communication is generally emphasized, yet cross-role handoffs are less consistently visible. For example, a website may tell students to share accommodation letters with instructors, but not explain whether disability services office also notifies instructors, or how instructors should ask implementation questions. Type 3 most clearly signals ongoing staff–student communication through meetings, and Type 2 often implies structured communication through an online system. In contrast, Type 1 frequently relies on students to carry communication forward at the course level. Across all three prototypes, the information available on webpages rarely makes staff–faculty communication channels explicit, even though implementation often depends on instructor understanding and timely coordination with students and staff. When handoff pathways are unclear, instructors may rely on informal norms and students may carry the burden of explaining needs, which can weaken effective communication channels in practice.

Theme 3: Academic adjustments are stated, but faculty implementation guidance is inconsistent across institutions (§104.44; §35.130)

Section 504 emphasizes academic adjustments in postsecondary education (§104.44) [8]. Across all three prototypes, websites commonly state that accommodations will be approved and implemented, yet faculty-facing guidance varies across institutions. Posted materials inconsistently explain how instructors receive accommodation information, what instructors should do when course-specific questions arise, and how instructors should communicate with disability services when implementation questions occur. In many cases, instructor information is briefly described, scattered across several pages, or entirely absent, while student-facing steps are described in greater detail. This inconsistency matters because academic adjustments depend on instructor action in classrooms and learning environments (§104.44), and differing implementation can also shape how programs are administered in practice, which connects to Title II’s nondiscrimination expectations in program administration (§35.130) [7], [8].

Theme 4: Time expectations are a cross-cutting visibility gap (§35.160; §104.44)

Across prototypes, many websites list steps without stating time expectations for review, documentation follow up, or activation of accommodations. This gap can constrain effective

communication (§35.160) because students and instructors may not know when coordination should occur [7]. It can also affect academic adjustments (§104.44) when uncertainty delays implementation or makes planning difficult for students [8]. This omission appeared in different ways across prototypes. As a result, time expectations emerged as a shared constraint in how public webpages support effective communication and predictable access.

Based on the prototype synthesis and policy-lens themes, we developed a short website checklist to help institutions improve what is publicly visible about the accommodation process. The checklist is organized around three priorities: (a) clarity of the full step sequence, (b) time-related information where feasible, and (c) role clarity and implementation support, including a faculty guide and a service–faculty consultation channel. In this way, the checklist is intended not only to improve website transparency, but also to support clearer coordination among students, disability services, and faculty during accommodation initiation and implementation. The full checklist is provided in Appendix B.

Discussion and Implications

Categorized as prototypes, we captured meaningful differences in how institutions structure and communicate accommodations pathways. These differences are not only in process presentation but also shape the clarity of roles, steps, and follow-through. This framing is especially useful in engineering programs where students may be concerned about the social and professional risks of requesting and utilizing accommodations and where unclear implementation expectations can increase hesitation [15], [24]. For example, the Pre-Approval Interactive Prototype (Type 3) makes staff–student interaction visible prior to approval, which can be read as a cue of individualized consideration consistent with nondiscrimination expectations in program administration (§35.130) [7]. Rather than treating scattered webpages as isolated information, synthesizing them into prototypes helps visualize the current public-facing processes and makes cross-role handoffs and missing information easier to detect. This, in turn, supports a policy-lens interpretation of where the posted guidance shows apparent alignment with key criteria and where recurring gaps or miscommunications appear.

These gaps provide opportunities for improvement and informed the development of the accommodation website checklist, moving this study from a descriptive synthesis of webpage content toward an applied tool for website, and ultimately accessibility – improvement. The checklist (Appendix B) offers a low-cost, actionable set of items institutions can publish and apply to previously-published material to make steps, timing cues, and role handoffs easier to understand and follow across stakeholder groups (e.g., students, families, staff, faculty, administrators, etc.). In engineering contexts, this tool may be especially useful for strengthening faculty guidance in courses, labs, and other applied settings where accommodation implementation may require clearer role expectations and earlier coordination.

Limitations

This study includes a few methodological limitations. First, this work is based on publicly available web content. Webpages can and likely will change over time, and posted information at the time of publication may not accurately reflect changes in university accommodation policy and practice. Second, because the sample focuses on U.S. institutions and publicly-available

process communication, the findings should be read as patterns in and improvements for accommodation website presentation, rather than claims about accommodation communication effectiveness for all students or all institutional contexts.

Future Work

A next step is to explore how website clarity is reflected in lived experience. Interviews with students, disability services staff, and faculty will examine whether the gaps identified here affect how students navigate the process and how faculty interpret and implement accommodations in engineering courses. In postsecondary education, students with disabilities may be working with professionals outside the university system who are providing support services such as rehabilitation counselors and community service providers. Interviews with these professionals will also further understanding of the accuracy and accessibility of website content. Moreover, prior engineering- and STEM-focused work suggests that disclosure concerns and interactions with instructors can strongly shape students' experiences, so these perspectives are essential for interpreting how web guidance functions in practice [4], [25].

A second direction for future research is a design and infrastructure study of institutional websites. Future work can examine how accommodation resources are organized across pages, links, and documents, and whether users can locate key process information through a logical sequence without missing critical details. This direction treats accessibility, navigation, and content organization as part of online infrastructure and can identify practical website design features that make accommodation information easier to find and support clearer access to the process [26]. Section 508 of the Rehabilitation Act of 1973 as amended can be integrated into this work by examining whether posted materials are provided in accessible formats and whether the presentation supports access for users who rely on assistive technologies such as screen readers [27].

Conclusions

In this practice paper, we synthesized publicly posted accommodation process information from 25 U.S. institutions into three recurring accommodations process prototypes. Using ADA Title II and Section 504 of the Rehabilitation Act of 1973 as amended as a policy lens, our analysis identified where these prototypes show visible alignment with expectations related to nondiscrimination, effective communication, and academic adjustments, and where recurring gaps remain in what websites make visible. We found institutions often provide a clear entry point but process transparency varies across later steps, especially in time expectations, faculty-facing implementation guidance, and staff–faculty communication cues.

As a result, we propose a checklist to address these prototype-level gaps by translating our findings into scalable, practical guidance to be used at institutions to refine public-facing webpages. Together, the prototypes, policy-lens interpretation, and checklist can be used to provide a practical basis for improving how accommodation processes are presented to students, faculty, and others. This information can be used with particular relevance for engineering contexts where clearer faculty guidance and process communication can help shape more navigable and coordinated pathways to access and participation.

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Appendix A. Prototype Classification of Institutions

	Accommodation processes for disability services			
	Type 1	Type 2	Type 3	Note
Institution ID				
I01	x			
I02		x		
I03		x		
I04			x	
I05	x	x		Use type 2 → 1
I06		x		
I07	x	x		Use type 2 → 1
I08		x		
I09		x		
I10		x		
I11		x		
I12	x			
I13	x			
I14	x			
I15	x			
I16	x	x		Use type 2 → 1
I17	x		x	Use type 3 → 1
I18		x		
I19		x		
I20	x			
I21		x	x	Use type 3 → 2
I22		x		
I23		x		
I24		x	x	Use type 3 → 2
I25			x	

Appendix B. Accommodation Process Website Checklist (Yes/No)

- ☐ 1. The page shows the full step order: intake → review → decision → accommodation plan → letter → instructor notification → student–instructor meeting → implementation.
- ☐ 2. Pre-letter timelines are published (numbers appear) for eligibility review, accommodation plan creation, and letter release.
- ☐ 3. Post-letter timelines are published (numbers appear) for scheduling the student–instructor meeting and for implementation start.
- ☐ 4. “Start here” is concrete (exact submission method stated: portal/form/email).
- ☐ 5. Documentation basics are stated (accepted types/recency).
- ☐ 6. Instructor notification method and channel are stated, and a recommended timeframe is given for the student to meet each instructor.
- ☐ 7. A public Faculty Implementation Guide is linked on the process page (brief, actionable steps for using approved accommodations in classes/labs).
- ☐ 8. A public Service–Faculty Consultation Channel is provided for course-specific questions about understanding and applying approved accommodations.
- ☐ 9. A Student–Instructor Meeting Guide is provided with suggested talking points including course needs, how the accommodations will be used.
- ☐ 10. A single, clearly labeled contact channel for students appears on the page (email/phone/portal message).