Report to Congressional Addressees

April 2024

HIGHER EDUCATION

Education Could Improve Information on Accommodations for Students with Disabilities

April 2024

HIGHER EDUCATION

Education Could Improve Information on Accommodations for Students with Disabilities

Why GAO Did This Study

Research suggests that more students with disabilities are pursuing college than in years past. GAO was asked to review issues regarding accessibility and accommodations for students with disabilities at colleges.

This report examines (1) trends in and characteristics of the population of college students with disabilities, (2) any challenges to accessing education that students with disabilities face in college and how colleges have mitigated them, and (3) the extent to which Education helps mitigate these challenges.

GAO analyzed the most recent data from three of Education's nationally representative surveys. GAO also held eight discussion groups with college students, faculty, and disability services staff and interviewed Education officials. Colleges were selected for institutional variety (e.g., public and private). GAO also reviewed recent academic reports, relevant federal laws, and pertinent guidance documents.

What GAO Recommends

GAO is making two recommendations to Education to (1) encourage state and local educational agencies to disseminate resources about the importance of self-advocacy to obtain accommodations in college, and (2) enable college staff to receive notifications of newly issued guidance and other information about accommodations for postsecondary students with disabilities. Education generally agreed with GAO's recommendations.

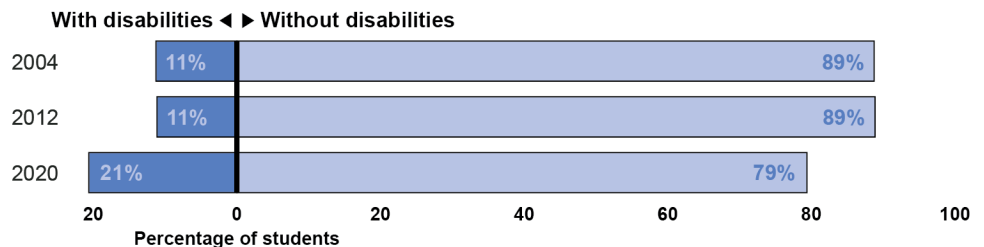View GAO-24-105614. For more information, contact Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov.

What GAO Found

The percentage of college students with disabilities has increased since 2004 according to GAO's analysis of Department of Education data (see figure). The increase is largely driven by more students reporting mental health conditions or attention deficit disorder. Students with disabilities graduated from college at lower rates than those without disabilities. Further, those with disabilities who did graduate were less likely to be employed full-time than peers without disabilities.

Estimated Percentage of College Students by Disability Status, 2004–2020

With disabilities ◀ ▶ Without disabilities

Year	With disabilities	Without disabilities
2004	11%	89%
2012	11%	89%
2020	21%	79%

Percentage of students

Source: GAO analysis of National Postsecondary Student Aid Study data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types. Estimates are within a 1 percent margin of error.

Students with disabilities face several challenges while transitioning to and attending college, according to college disability services staff and students GAO spoke with. For example, some students are unaware of or unprepared for the self-advocacy necessary to request accommodations without help from their parents, who can play a pivotal role in obtaining academic supports in high school. In addition, some students experience reluctance from faculty to provide accommodations. To help mitigate these challenges, college staff reported holding orientation sessions for students on how to request accommodations and training faculty on how to make their courses accessible, among other steps.

Education has also taken steps to help address challenges faced by college students with disabilities. Education provides a range of supports including guidance, technical assistance, grants, and other resources. Education's priorities and federal standards highlight the need for prompt communication of guidance and other information affecting college students with disabilities. However, college staff GAO spoke with identified information gaps. For example:

- Education has issued guidance materials on the importance of self-advocacy for students with disabilities in college, but this information may not reach students transitioning from high school. By encouraging state and local educational agencies to disseminate resources about the need for self-advocacy to assist students who wish to attend college, Education could help ensure that college students with disabilities are prepared to obtain needed accommodations.

- Education does not provide notifications to college staff of newly issued guidance and other information about accommodations for students with disabilities, despite notifications on other topics. As a result, college staff report difficulties staying current on information that could help them support students with disabilities.

United States Government Accountability Office

Contents

Figures

Abbreviations

ADA	Americans with Disabilities Act of 1990
ADD	attention deficit disorder
AHEAD	Association on Higher Education and Disability
B&B	Baccalaureate and Beyond Longitudinal Study
BPS	Beginning Postsecondary Students Longitudinal Study
DSO	disability services office
GPA	grade point average
HEA	Higher Education Act of 1965, as amended
IDEA	Individuals with Disabilities Education Act
IEP	individualized education program
NPSAS	National Postsecondary Student Aid Study
NTACT:C	National Technical Assistance Center on Transition: The Collaborative
OCR	Office for Civil Rights
OPE	Office of Postsecondary Education
OSEP	Office of Special Education Programs
OSERS	Office of Special Education and Rehabilitative Services
pre-ETS	pre-employment transition services
Rehabilitation Act	Rehabilitation Act of 1973
RSA	Rehabilitation Services Administration
SSS	Student Support Services
TPSID	Transition and Postsecondary Programs for Students with Intellectual Disabilities
TRIO	Federal TRIO programs
VR	vocational rehabilitation

GAO U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W.
Washington, DC 20548

April 30, 2024

Congressional Addressees

Research suggests that more students with disabilities are pursuing higher education than in years past. Under federal law, colleges must generally provide equal access to qualified students with disabilities.[1] For example, in certain circumstances, colleges may provide accommodations, such as extending time allowed for taking tests or providing sign language interpreters. Under normal circumstances, accessing accommodations can be challenging for some students. According to reports during the COVID-19 pandemic, new teaching methods introduced challenges for certain students with disabilities even if students had access to adequate technology. In many instances, the Department of Education is responsible for enforcing colleges' compliance with relevant federal disability laws.

We were asked to review issues regarding accessibility and accommodations for students with disabilities at colleges, including any challenges related to the COVID-19 pandemic. We were also asked to describe how Education's grant programs known as the Federal TRIO programs (TRIO) recruit and support students with disabilities.

This report examines (1) trends in and characteristics of the population of college students with disabilities; (2) any challenges to accessing education that college students with disabilities face, including any related to the COVID-19 pandemic, and how colleges have mitigated them; and (3) the extent to which Education helps mitigate these challenges (e.g., through TRIO and other efforts).

To address the first objective, we analyzed nationally representative survey data from Education and reviewed related reports. Specifically, we analyzed data from Education's quadrennial National Postsecondary Student Aid Study (NPSAS) from 2004 through 2020, Beginning Postsecondary Students Longitudinal Study (BPS) from 2017, and

---

[1]In this report, we use the term "colleges" to include other types of postsecondary education institutions such as universities and trade schools.

GAO-24-105614 Higher Education Accessibility

Baccalaureate and Beyond Longitudinal Study (B&B) from 2018.[2] They were the most recent datasets for these studies at the time of our review.

To address the second objective, we conducted two discussion groups with college students with disabilities, five discussion groups with college disability services office (DSO) officials, and one discussion group with faculty. In addition, we visited four colleges and conducted interviews with DSO officials there. We selected colleges to visit and DSO officials to invite to discussion groups that would yield institutional variety (e.g., public and private, 2-year and 4-year, and geographic location). We also reviewed academic reports and interviewed national advocates for college students with disabilities that we selected based on their expertise. Through the discussion groups, site visits, and interviews, we spoke with 39 individuals. Their views are not generalizable.

To address the third objective, we reviewed relevant federal laws and Education documents about relevant grants and other efforts to support college students with disabilities. In addition, we interviewed Education officials and advocates for students with disabilities, and six randomly selected TRIO grantees that support college students with disabilities. We also assessed Education's efforts for communicating key information to these stakeholders against the Department's objectives and applicable federal standards for internal control.[3]

We assessed the reliability of data we received from Education by reviewing relevant documentation and interviewing knowledgeable officials and found them to be sufficiently reliable for the purposes of our reporting objectives.

For each of our reporting objectives, we limited the scope to undergraduate students. See appendix I for more details on our scope and methodology.

---

[2]NPSAS focuses on the characteristics of postsecondary students and how they finance their education. BPS tracks students' paths through college by surveying them at three points in time including 6 years after first starting postsecondary education. B&B tracks degree holders over 10 years.

[3]GAO, *Standards for Internal Control in the Federal Government,* GAO-14-704G (Washington, D.C.: September 2014). We considered principle 15, which states that management should externally communicate necessary quality information to achieve the entity's objectives.

We conducted this performance audit from April 2022 to April 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Legal Protections for College Students with Disabilities

Colleges are prohibited from discriminating against students on the basis of disability under two federal laws. Section 504 of the Rehabilitation Act of 1973 (Rehabilitation Act) prohibits entities that receive federal financial assistance, which includes institutions of higher education, from discriminating against otherwise qualified individuals with disabilities. The Americans with Disabilities Act of 1990 (ADA) also prohibits discrimination based on disability and covers a broad range of schools (with public schools being covered under Title II, and private schools generally covered under Title III).[4]

Colleges are required to provide certain accommodations to qualified students. For example, the regulations implementing the Rehabilitation Act outline categories of accommodations. One category is auxiliary aids (e.g., sign language interpreters). Colleges can also provide other accommodations such as extended time on tests and reduced course loads, as appropriate.

According to Education, colleges are not required to provide accommodations that would fundamentally alter the nature of a program, lower or waive essential academic requirements, or result in undue financial or administrative burdens. Also, colleges are not required to provide personal devices, such as wheelchairs, or personal services, such as assistance with eating.

---

[4]For purposes of Section 504, the Rehabilitation Act generally defines an individual with a disability using the definition of disability from the ADA. 29 U.S.C. § 705(20)(B). The ADA, in turn, defines disability as a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment. In addition, the ADA sets out rules of construction for determining who is an individual with a disability and provides a non-exhaustive list of "major life activities," which includes learning, reading, concentrating, and thinking. See 42 U.S.C. § 12102.

Students with disabilities have different responsibilities in obtaining accommodations in college than they did in obtaining academic supports in K-12. Specifically, the Individuals with Disabilities Education Act (IDEA) requires state educational agencies, other state agencies, or school districts to evaluate children who may have a disability and provide special education and related services to those determined to have disabilities. Generally, once a student graduates from high school, these IDEA requirements no longer apply to them.[5, 6] As a result, once in college, students are responsible for identifying themselves as having a disability, providing documentation of their disability, and requesting accommodations and services.

Although the general procedure for obtaining accommodations is often similar across colleges, the particular steps of the process may vary (see fig. 1). According to Education, colleges are supposed to make individualized determinations regarding appropriate academic adjustments based on each student's specific circumstances.

---

[5]These IDEA requirements generally continue to apply to individuals up to age 21 who have not received a regular high school diploma, as defined by federal regulation. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential.

[6]In addition, there are certain requirements under Education's section 504 regulations that apply to elementary and secondary schools but not colleges. Specifically, school districts have an obligation to identify and locate children who may have a disability and to provide regular or special education and related aids and services to those determined to have disabilities.

Figure 1: Example of the Process for a Student to Obtain Accommodations in College

Register	Review options	Provide documentation	Seek accommodations	Notify professors
Student registers with the school's Disability Services Office (DSO)	Student works with the DSO to determine which accommodations may be needed and which accommodations are available	Student provides documentation of their disability, which may require visiting a qualified professional for: ■ Additional testing ■ Acquiring additional disability documentation	Student formally requests approved accommodations through the DSO	Student discusses how to implement DSO-approved accommodations with professors, as needed

Source: GAO analysis of Department of Education documents and discussions with college officials; GAO (icons). | GAO-24-105614

Note: Although the general procedure for obtaining accommodations is often similar across colleges, the steps of the process may vary.

Education's Role in Supporting College Students with Disabilities

As part of its mission, Education's strategic plan includes an objective to support educational institutions and state systems to raise academic quality and college completion for all students, especially for underserved students such as individuals with disabilities. Education has several offices to help support this objective:

- The Office for Civil Rights (OCR) enforces Section 504 of the Rehabilitation Act and Title II of the ADA.[7] OCR carries out enforcement activities by investigating complaints and initiating compliance reviews, monitoring their resolutions, and providing technical assistance.

- The Office of Postsecondary Education (OPE) formulates federal postsecondary education policy and administers programs that aim to increase access to quality postsecondary education.

- The Office of Special Education and Rehabilitative Services (OSERS) provides an array of supports to parents, individuals, school districts, and states in two main areas pertinent to this study—special

---

[7]The Department of Justice (Justice) and Education share responsibility for investigating complaints relating to elementary, secondary, and postsecondary schools under Title II of the ADA, which applies to public entities; however, according to Education officials, Education generally conducts these investigations. Justice is solely responsible for enforcing Title III of the ADA to ensure that private entities, including private colleges and universities, do not discriminate on the basis of disability. Justice and Education share enforcement jurisdiction if a private school receives federal funding from Education (with Justice having jurisdiction under Title III of the ADA, and Education having jurisdiction under Section 504 of the Rehabilitation Act). Justice also has jurisdiction pertaining to testing entities, such as for college admissions tests and law and medical school exams.

education and vocational rehabilitation (VR)—to help students with disabilities prepare for and participate in postsecondary education.

Services to Help Students with Disabilities Transition to Postsecondary Education and Related Monitoring

IDEA requires that for certain children with disabilities, transition services be included in an individualized education program (IEP)—a written plan that an IEP team develops and then reviews at least once a year.[8] Beginning no later than the first IEP in effect when the student is 16 years old, a student's IEP must include (1) appropriate measurable postsecondary goals based upon age appropriate transition assessments related to education and training, employment, and where appropriate, independent living skills; and (2) the transition services needed to assist the child in reaching those goals.[9] Under IDEA regulations the student must be invited to IEP team meetings when a purpose of the meeting is to consider the postsecondary goals for the child and the transition services needed to assist the child in reaching those goals.

Within OSERS, the Office of Special Education Programs (OSEP) administers IDEA—which authorizes grants to states to provide special education and related services to children with disabilities—and monitors states' implementation of IDEA. OSEP uses 17 measurement tools, called indicators, to annually monitor states' implementation of IDEA. One indicator measures the implementation of IDEA requirements regarding students transitioning from secondary school to postsecondary pursuits including education.

[8]See 20 U.S.C. § 1414. An IEP team is composed of the student's parents and certain teachers, a school district representative, an individual who can interpret the instructional implications of evaluation results, individuals with knowledge or expertise regarding the student (at the discretion of the parent or school district), and the student, when appropriate.

[9]"Transition services" are a coordinated set of activities that (1) are designed to be within a results-oriented process focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities such as postsecondary education; (2) are based on the individual child's needs, taking into account the child's strengths, preferences, and interests; and (3) include instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and when appropriate, acquisition of daily living skills and functional vocational evaluation. 20 U.S.C. § 1401(34).

The Rehabilitation Act requires states to ensure that state VR agencies provide, or arrange for the provision of, pre-employment transition services (pre-ETS) to students with disabilities in need of such services who are eligible or potentially eligible for VR services.[10] Pre-ETS have various components, two of which are counseling on opportunities for enrollment in postsecondary education and instruction in self-advocacy. OSERS's Rehabilitation Services Administration (RSA) helps state agencies operate VR programs.

The Population of College Students with Disabilities Increased but These Students Graduated at Lower Rates than Those without Disabilities

From 2004 to 2020, the Percentage of College Students with Disabilities Increased from 11 Percent to 21 Percent

According to our analysis of Education's data from NPSAS, which focus on the characteristics of postsecondary students and how they finance their education, an estimated 21 percent of all college students had a disability in 2020 compared to 11 percent in 2004.[11] This change occurred as the estimated overall number of students enrolled in college decreased by 15 percent from 20 million students in 2004 to 17.1 million students in 2020. In contrast, the number of students with disabilities increased an estimated 56 percent from 2.3 million students in 2004 to 3.5 million in 2020 (see fig. 2).

[10]The Rehabilitation Act requires states to set aside at least 15 percent of certain federal funds for the provision of pre-ETS.

[11]All estimates presented in this report from NPSAS, BPS, or B&B have a margin of error at the 95 percent confidence level. Unless noted otherwise, all percentage estimates are within 7 percent margin of error, and all estimates of the number of students or other numbers are within 9 percent margin of error. In addition, any differences in estimates presented in this report are statistically significant, unless noted otherwise.

Figure 2: Estimated Number of College Students by Disability Status, 2004-2020
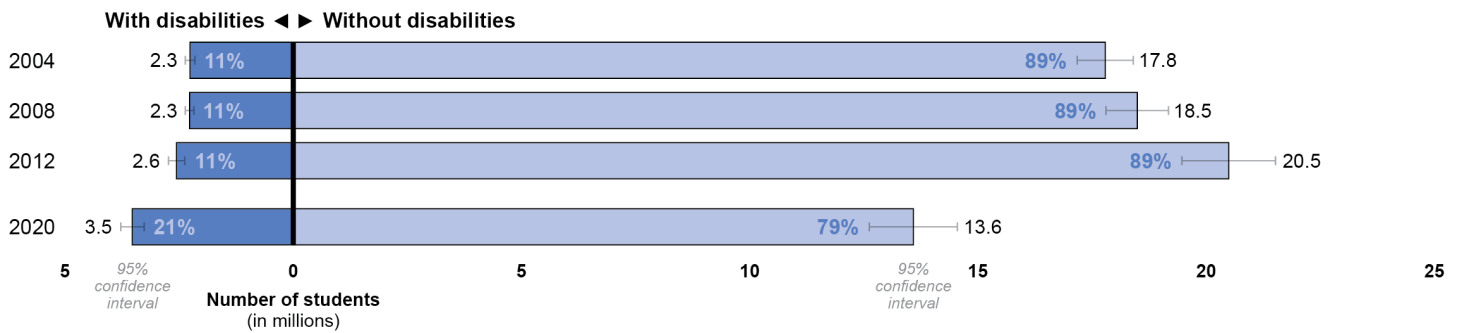
With disabilities ◄ ► Without disabilities

Year	With disabilities		Without disabilities	
2004	2.3	11%	89%	17.8
2008	2.3	11%	89%	18.5
2012	2.6	11%	89%	20.5
2020	3.5	21%	79%	13.6

5   95% confidence interval   0   5   10   95% confidence interval   15   20   25

Number of students
(in millions)

Source: GAO analysis of National Postsecondary Student Aid Study (NPSAS) data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types (e.g., 4-year, 2-year, and less than 2-year). The figure excludes 2016 data because NPSAS changed the definition of disability for that year only and reverted to the prior definition in 2020. All percentage estimates are within 1 percent margin of error, and all estimates of the number of students are within an 8 percent margin of error.

Much of the growth in the population of students with disabilities was driven by an increase in the number of students with behavioral or emotional conditions, such as depression and attention deficit disorder (ADD) (see fig. 3). Combined, students with behavioral or emotional disabilities made up an estimated 69 percent of those with disabilities in 2020—more than double the share in 2004. Within this category, from 2004 to 2020, the number of students with depression and ADD increased by an estimated 226 percent and 188 percent, respectively. Appendix II provides additional data about college students with disabilities by condition.

Figure 3: Estimated Number of College Students with Disabilities by Main Type of Disability, 2004–2020

Number of students (in millions)

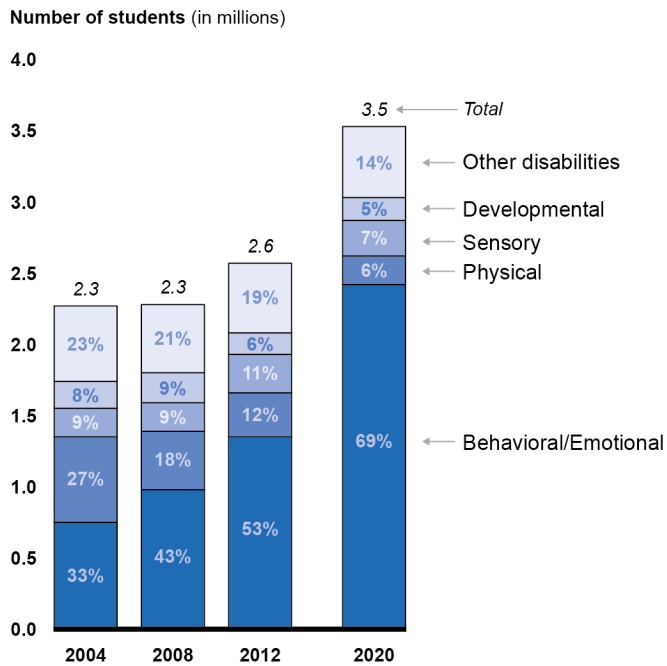| Year	Total	Behavioral/Emotional	Physical	Sensory	Developmental	Other disabilities
2004	2.3	33%	27%	9%	8%	23%
2008	2.3	43%	18%	9%	9%	21%
2012	2.6	53%	12%	11%	6%	19%
2020	3.5	69%	6%	7%	5%	14%

Source: GAO analysis of National Postsecondary Student Aid Study (NPSAS) data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types (e.g., 4-year, 2-year, and less than 2-year). The figure excludes 2016 data because NPSAS changed the definition of disability for only that year and reverted to the prior definition in 2020. The disability types are for an individual's main condition, so a student with multiple disabilities is counted once. "Physical" includes speech or language, orthopedic or mobility, and brain injury impairments. "Developmental" includes specific learning disabilities, dyslexia, and developmental disabilities. "Behavioral/Emotional" includes attention deficit disorder; mental, emotional, and psychiatric conditions; and depression. "Sensory" includes hearing and visual impairments. "Other disabilities" includes other health impairments or problems. All percentage estimates are within a 2 percent margin of error, and all estimates of the number of students are within a 15 percent margin of error.

A factor contributing to the growth in the population of students with disabilities is that more students are being diagnosed with mental health conditions. For example, a 2022 U.S. Department of Health and Human Services study found increases in the proportion of children diagnosed with mental health conditions.[12] Specifically, between 2016 and 2020, the proportion of children aged 3 to 17 diagnosed with anxiety and depression grew by an estimated 29 percent and 27 percent, respectively. One disability professional we interviewed suggested that a

---

[12]Lydie A. Lebrun-Harris, Reem M. Ghandour, Michael D. Kogan, and Michael D. Warren, "Five Year Trends in US Children's Health and Well-being, 2016-2020," *JAMA Pediatrics,* vol. 176, no. 7 (2022), https://doi.org/10.1001/jamapediatrics.2022.0056.

diagnosis prior to college could increase the likelihood of a student registering with their college's disability services office (DSO), especially if the student received academic supports in secondary school. Additionally, individuals may now experience less stigma associated with mental health conditions and therefore be more likely to report having one. For example, a 2021 study found evidence of a significant decrease in public stigma toward depression from 1996 to 2018.[13] The authors concluded that changes were associated with age and generational shifts.[14]

Demographic Characteristics of College Students with Disabilities Were Similar to Students without Disabilities in Several Ways
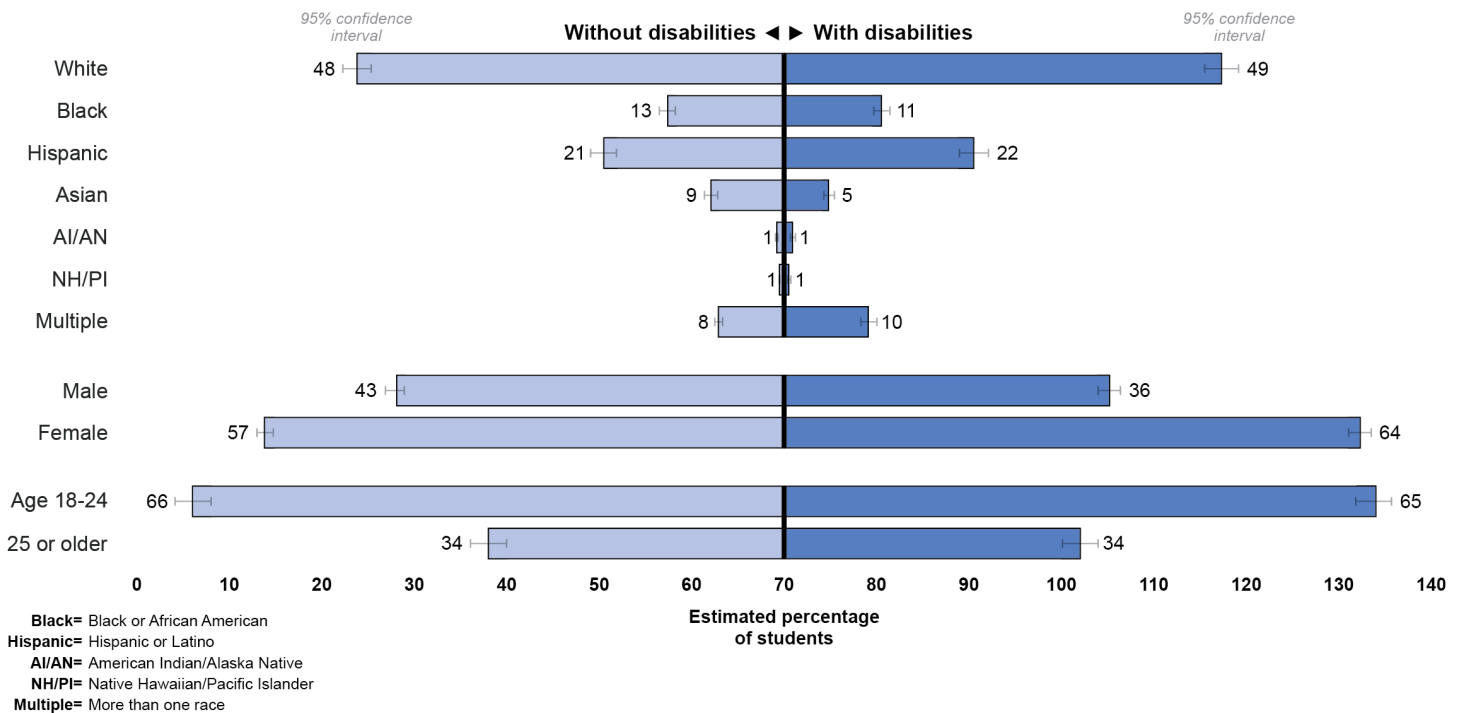
Students with disabilities, generally, resembled those without disabilities in racial and ethnic composition and age, but not sex. For example, in 2020, according to our NPSAS estimates, 49 percent of students with disabilities were White compared to 48 percent without disabilities (see fig. 4). In the same year, an estimated 65 percent of students with disabilities were 18–24 years old compared to 66 percent of those without disabilities. However, students were not similar in sex: 64 percent of students with disabilities were female compared to 57 percent of students without disabilities.[15]

---

[13]Bernice A. Pescosolido, Andrew Halpern-Manners, Liying Luo, and Brea Perry, "Trends in Public Stigma of Mental Illness in the US, 1996-2018," *JAMA Network Open*, vol. 4, no. 12 (2021), https://doi.org/10.1001/jamanetworkopen.2021.40202.

[14]The COVID-19 pandemic also contributed to the rise in mental health challenges among young people. Because the 2020 NPSAS survey was initiated in March 2020, it is possible that the pandemic could have impacted the percentage of students reporting emotional disabilities in that year.

[15]The number of female students reporting disabilities grew by 65 percent between 2004 and 2020 while the number of male students reporting disabilities grew by 31 percent. Much of this growth was driven by increases in reported behavioral or emotional conditions, which increased by 255 percent for female students, for example. We use the term sex for consistency because NPSAS did not collect nonbinary gender data before 2020.

Figure 4: Estimated Percentage of College Students by Disability Status and Race and Ethnicity, Sex, and Age, 2020

95% confidence interval   Without disabilities ◄ ► With disabilities   *95% confidence interval*

Category	Without disabilities	With disabilities
White	48	49
Black	13	11
Hispanic	21	22
Asian	9	5
AI/AN	1	1
NH/PI	1	1
Multiple	8	10
Male	43	36
Female	57	64
Age 18-24	66	65
25 or older	34	34

0 10 20 30 40 50 60 70 80 90 100 110 120 130 140

Estimated percentage of students

Black= Black or African American
Hispanic= Hispanic or Latino
AI/AN= American Indian/Alaska Native
NH/PI= Native Hawaiian/Pacific Islander
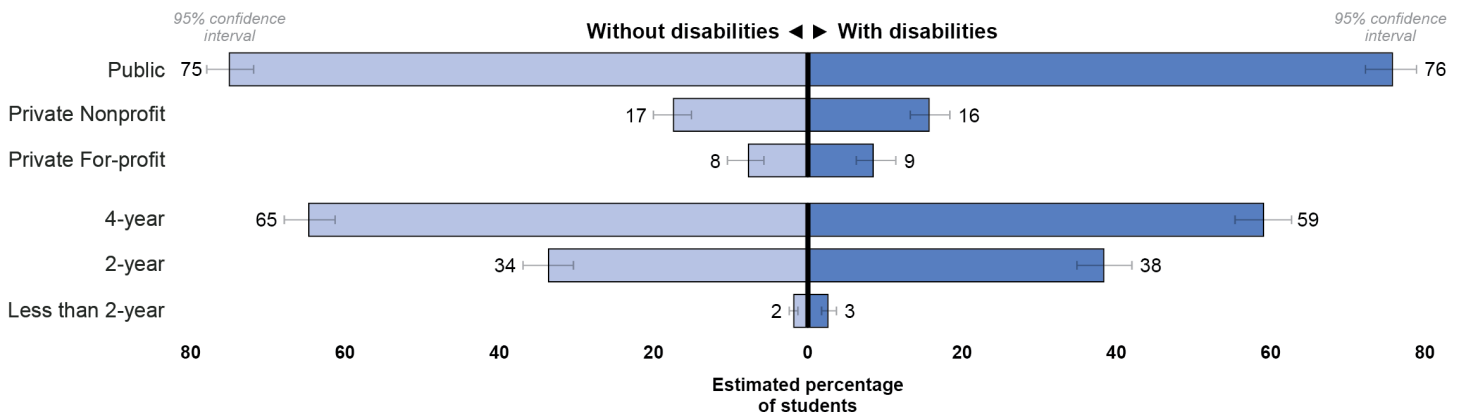**Multiple=** More than one race

Source: GAO analysis of National Postsecondary Student Aid Study (NPSAS) data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types (e.g., 4-year, 2-year, and less than 2-year). All estimates are within a 3 percent margin of error.

Students with and without disabilities were also similar regarding the types of schools they attended—public versus private schools as well as 4-year versus 2-year schools—according to NPSAS data for 2020. Students with disabilities attended public schools at rates similar to students without—at 76 percent and 75 percent, respectively, for example (see fig. 5). Additionally, students in both groups attended 4-year schools and 2-year schools at statistically similar rates. Specifically, an estimated 59 percent of students with disabilities attended 4-year schools compared to 65 percent of students without. Students with and without disabilities also had similar attendance patterns (e.g., full-time versus part-time). For example, approximately 49 percent and 51 percent of both groups attended school full-time, respectively.

GAO-24-105614 Higher Education Accessibility

Figure 5: Estimated Percentage of College Students by Disability Status and Institution Type, 2020

95% confidence interval   Without disabilities ◄ ► With disabilities   *95% confidence interval*

Public	75 / 76
Private Nonprofit	17 / 16
Private For-profit	8 / 9
4-year	65 / 59
2-year	34 / 38
Less than 2-year	2 / 3

80   60   40   20   0   20   40   60   80

Estimated percentage of students

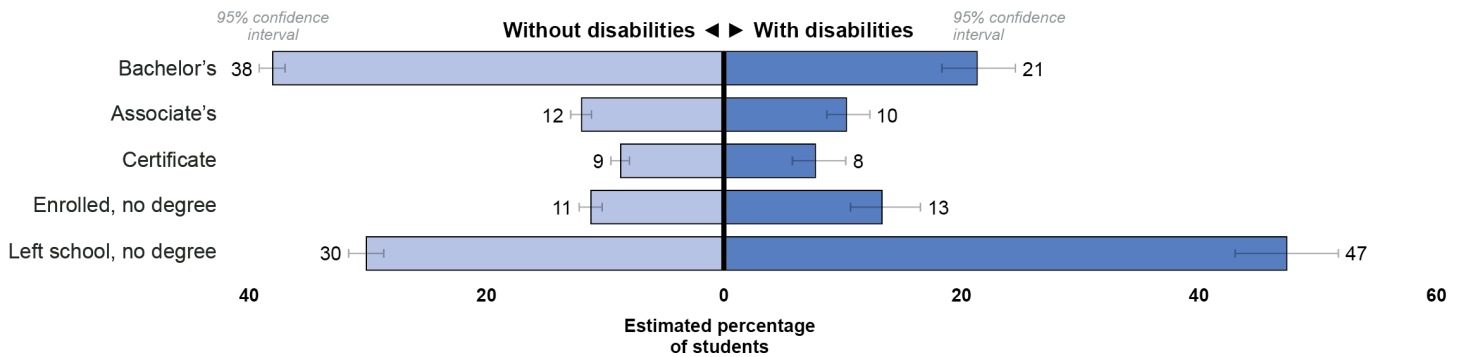Source: GAO analysis of National Postsecondary Student Aid Study data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types. All estimates are within a 7 percent margin of error.

Students with Disabilities Were Less Likely to Graduate from College than Those without Disabilities

Despite some similarities between students with and without disabilities, students with disabilities had different academic outcomes in college. According to our analysis of Education's Beginning Postsecondary Students Longitudinal Study (BPS), students with disabilities left school without obtaining a degree at a higher rate than students without disabilities.[16] The 2017 BPS, which surveyed students who began college during the 2011–2012 school year, indicates that an estimated 47 percent of students with disabilities left school without obtaining a degree, compared to 30 percent of students without disabilities (see fig. 6). Additionally, according to NPSAS data, students with disabilities achieved slightly lower grade point averages (GPA) compared to those without at 3.00 and 3.19, respectively.

---

[16]BPS surveys students at the beginning of their first year of college as well as at the end of their third and sixth years after starting college.

Figure 6: Estimated Percentage of College Students by Disability Status and Degree Attainment through 2016–2017

Source: GAO analysis of Beginning Postsecondary Students Longitudinal Study data. | GAO-24-105614

Note: This figure includes individuals who first began a postsecondary undergraduate program regardless of level in 2011–2012 and measures the cumulative outcome of enrollment through the end of 2016–2017. All estimates are within a 5 percent margin of error.

College Graduates with Disabilities Were Employed at Lower Rates than Those without Disabilities

Students with disabilities who graduated achieved lower employment outcomes than students without disabilities. According to our analysis of Education's Baccalaureate and Beyond Longitudinal Study from 2018, which follows graduating seniors 1, 4, and 10 years after completing their bachelor's degree, students with disabilities were employed full-time at a lower rate than students without disabilities 10 years after obtaining a bachelor's degree—an estimated 73 percent and 78 percent, respectively.[17] Nonetheless, the employment gap between individuals with and without disabilities is smaller among those with a college degree than it is among all working-age adults. According to a report based on American Community Survey data, working-age adults with disabilities were employed at a lower rate than working-age adults without disabilities in 2021: an estimated 41 percent versus 77 percent, respectively.[18]

In addition to lower rates of full-time employment, students with disabilities earned less money than students without disabilities 10 years

---

[17]Students with disabilities had employment outcomes similar to students without disabilities when comparing the rates of those who were employed part-time (12 percent versus 10 percent), out of the labor force (8 percent versus 6 percent), and unemployed (7 percent versus 6 percent).

[18]Paul, S., Rogers, S., Bach, S., & Houtenville, A.J. (2023). Annual Disability Statistics Compendium: 2023. Durham, NH: University of New Hampshire, Institute on Disability. The reported employment data are for individuals ages 18 to 64 residing in the community and not in institutions such as prisons or nursing homes.

after graduating with a bachelor's degree. In 2018, on average, students with disabilities earned approximately $69,000 per year while students without disabilities earned $78,000 per year.

Students with Disabilities Face Challenges Accessing Higher Education, and Colleges Have Developed Different Strategies to Help

Students with Disabilities Face Longstanding Challenges Transitioning to College and Obtaining Accommodations

Students with disabilities face several longstanding challenges while transitioning to and attending college. We discussed several of these challenges in our 2009 report.[19] We heard about challenges from students, faculty, and disability services office (DSO) officials in our discussion groups and site visits. In these conversations, several themes emerged.

Need for self-advocacy. Some students are unaware of or unprepared for the self-advocacy necessary to request accommodations, according to DSO officials and students we spoke with. For example, one student said that some students are unaware that their parents—who play a pivotal role in helping students obtain academic supports in elementary and secondary school—are no longer invited to participate in that process in college. A DSO official explained that some students are not prepared to independently set up meetings and complete the registration process to request accommodations. One official said even after successfully requesting and receiving approval for accommodations, quite a few students who obtain approval for accommodations do not use them. This is because they either did not follow through on the remaining steps in the process or they lacked confidence in discussing options with their professors.

---

[19]We previously reported about challenges colleges face when students with disabilities are uninformed about the need for self-advocacy with respect to obtaining accommodations in college. See GAO, *Higher Education and Disability: Education Needs a Coordinated Approach to Improve Its Assistance to Schools in Supporting Students*, GAO-10-33 (Washington, D.C.: Oct. 28, 2009).

Changes in eligibility for some academic supports. Some students do not understand that in college they may not be eligible for the same academic supports that they received in high school, according to DSO officials and student advocates we spoke with. That is because the relevant provisions of IDEA generally do not apply in college. Two officials said that a large percentage of their students with disabilities assumed that they would receive the same accommodations in college as the academic supports they had received in high school. One official explained that many of their college's students with disabilities do not understand the distinction between academic supports in high school that are in place to facilitate success under IDEA and accommodations in college that are in place to facilitate access to education when IDEA no longer applies. This official added that a lot of the academic supports their students had received in high school, such as retaking tests to improve their grades, are not considered to be appropriate accommodations at the college level.

Obtaining documentation for accommodations. Stakeholders identified three main ways in which students with disabilities can face challenges related to documentation required to obtain accommodations.

1. *Not knowing they need documentation to request an accommodation.* Some students with disabilities are unaware of the potential need to provide their college with documentation of their disability to be approved for accommodations, according to DSO officials and faculty we spoke with. One DSO official said this is the case for the vast majority of their students. Sometimes this issue arises because the onset of the disability such as a mental health condition began during college or had not been previously diagnosed, according to faculty and DSO officials we spoke with. Not only might these students need to obtain documentation of their disability, but newly diagnosed students also might not understand that they may qualify for accommodations in the college setting or know how to request them.

2. *Not having the documentation that their specific college requires.* Some students with disabilities face challenges obtaining approval for accommodations because they lack the type of documentation their colleges require, according to DSO officials and students. According to Education, colleges specify the type of documentation needed and how recent it must be, and requirements can vary from college to college. At one college we visited, psychoeducational or neuropsychological evaluations

used as evidence of a learning disability generally must be no more than 5 years old. Another college we visited does not specify a time frame for evaluations. A DSO official said many of their students believe that their IEP documents will be useful in obtaining accommodations, but that not all IEPs contain the information colleges need.

3. ***Experiencing delays or hardships in obtaining the documentation.*** Students who lack documentation may either experience delays in being granted accommodations while they wait for new or updated evaluations, or they may be unable to obtain the accommodations they seek. Evaluations for disability diagnoses by a qualified professional can be difficult to schedule in a timely way due to increased demand to meet with counselors who are able to diagnose them, according to two DSO officials. Another official explained that difficulty scheduling appointments for an evaluation affects students with newly diagnosed mental health conditions the most. DSO officials we spoke with also said evaluations can be prohibitively expensive. They estimated the cost of evaluations ranges from $1,000 to over $3,000. One of the students we spoke with reported paying for updated testing many times to get accommodations throughout her postsecondary education at multiple colleges.

Faculty reluctance to implement accommodations. Students sometimes face faculty resistance to implementing approved accommodations, in part due to lack of faculty training, according to faculty, students, and DSO officials we spoke with. They said faculty sometimes think that students are trying to cheat or gain an unfair advantage or that the approved accommodation is not legally required. Faculty explained that professors need to balance the provision of accommodations with the integrity of the course and that they could benefit from training in this area. According to faculty we spoke with, some faculty also lack training in how to teach in a universal design environment—one in which individual accommodations may not be needed because the course is designed and delivered to be accessible to all. For example, a professor could provide course materials using several different methods, such as by lecture, in presentation slides, and in writing to accommodate students' different needs.

Providing some accommodations creates an extra workload, which can undermine instructors' willingness to comply, according to faculty, students, and DSO officials. Faculty said the most common

accommodation request is for extended time. DSO officials explained that providing extended time increases faculty workloads when, for example, they need to proctor exams either because their college does not have a testing center or because the center cannot meet all testing needs. One official explained that when students can schedule extended time for tests in their college's testing center, the DSO staff proctor the exams instead of faculty. In addition, one of the students we interviewed attended a college without a testing center and said they had to drop a course because the professor would not schedule the exam using extended time in an alternate location.

DSO officials and faculty we spoke with also cited other reasons why students sometimes face reluctance from faculty in implementing accommodations. One official has found that some faculty members are more accommodating to individuals with physical or visible disabilities and less accommodating to those with less visible disabilities, such as learning or mental health disabilities. Another official said they remind students that they are not required to disclose their disability category to professors because doing so often causes them to challenge the DSO's judgment in approving accommodations, especially for mental health issues. Faculty noted that some fields face limitations in providing certain accommodations because of the nature of the discipline itself. For example, they said that while most disciplines can accommodate poor spelling, nurses are required to spell accurately when recording patients' medical information.

Remote Learning during the Pandemic Presented Challenges for Some Students and Benefited Others

Although students had their classes move online at similar rates during the spring of 2020, a greater percentage of students with disabilities took a leave of absence or withdrew because of the COVID-19 pandemic than those without disabilities.[20] Through our discussions with faculty, students, and DSO officials, we found that remote learning during the pandemic created both challenges and benefits for certain students with disabilities.

Challenges. Some students with disabilities faced challenges learning remotely while college campuses were closed due to the COVID-19 pandemic. Shifting to virtual teaching made learning more difficult for

---

[20]Our analysis of NPSAS 2020 data show that an estimated 5.4 percent of students with disabilities and 3.4 percent of students without disabilities took a leave of absence between January and June 2020 as a result of the pandemic. In addition, an estimated 6.3 percent of students with disabilities and 3.7 percent of students without disabilities withdrew during this time frame as a result of the pandemic.

some students with disabilities, according to DSO officials. Officials we spoke with said certain technology used for remote instruction presented particular challenges. For example, the electronic tools that some faculty used to help mitigate cheating on tests were incompatible with certain assistive technologies students needed. These tools also flagged students as potentially cheating when they were unable to focus on the screen without distractions or breaks because of their disability. Moreover, one official noted that many low-income students at his college, including some with disabilities, did not have access to the technology needed to avail themselves of online classes.

The shift to online learning was particularly challenging for students with visual and auditory disabilities, according to some of the DSO officials we spoke with. One official said it is difficult to accommodate visually impaired students effectively online because so much instructional material is presented visually. Similarly, according to two DSO officials we spoke with, online adaptations for deaf and hard of hearing students are not as effective as in-person communication in which students can use nonverbal cues to fully understand what is being said. One official further explained that sign language interpretation was also more difficult in an online environment when multiple people were talking at once. Auto-generated captioning is another option, but it is not as accurate as in-person communication.

Lack of in-person communication with instructors and access to campus resources presented additional challenges according to several DSO officials we spoke with. For example, students could not access their college testing center for extended time or a distraction-free environment. An official who proctored exams remotely while campuses were closed reported seeing students take exams in a closet because it was the only distraction-free environment at home. Another official said that online classes in which students had to review a prerecorded lecture or other instructional materials on their own time limited students' interaction with instructors. This disproportionately affected students with certain disabilities who needed the in-class presence to be successful.

Many of the challenges students with disabilities faced during the pandemic may have resolved themselves after classes returned to in-person, according to several DSO officials. However, some reported new challenges when campuses resumed in-person classes and students had to readjust to having fewer flexibilities. Several DSO officials we spoke with noted that some students prefer remote learning and requested it as an accommodation when campuses reopened, even though it was not

always possible to provide. One official reported receiving a lot more requests for flexible attendance and extended deadlines when students returned to campus and classes started to become more rigid again. This official also reported initial delays in providing accommodations when in-person classes resumed due to increased demand. Another DSO official explained that some students also faced challenges navigating buildings that suddenly had one entrance and one exit to allow for social distancing but had only one accessible doorway.

Benefits. DSO officials, faculty, and students we spoke with said some students with disabilities benefitted from remote instruction because it made some barriers easier to overcome. For example, note-taking services were easier to provide than before the pandemic because notetakers could attend classes on Zoom. Two of the students we spoke with benefited from remote learning because they had difficulty physically moving around the campus to attend in-person classes.

A few accommodations—like preferential seating in classrooms—were no longer needed when campuses were closed, according to several DSO officials and students. Virtual instruction also made it easier for some students with physical disabilities to attend classes because they were no longer worried about getting into buildings or navigating their campus in the snow. An official said the number of students registered with the DSO decreased when the campus was closed because classes were more flexible online. Another official said remote learning may have helped students who have difficulty paying attention or who have anxiety. Students and DSO officials we spoke with also said that the pandemic helped demonstrate to faculty that online instruction was possible.

Colleges Used a Range of Strategies Such as Outreach and Advocacy to Help Mitigate Key Challenges

DSO officials and students we spoke with identified several strategies college staff have used to help mitigate key challenges faced by students with disabilities. For example, some colleges held orientation sessions to help incoming students learn how to request and use accommodations. In addition, according to DSO officials we spoke with, to enable students with disabilities to use accommodations, some colleges employed flexible approaches to documentation requirements. A college might have approved a student's accommodations, for example, while waiting for updated documentation. Colleges have also taken steps to address faculty reluctance toward accommodations. For example, some DSO staff advocated for students by working one-on-one with faculty to make courses accessible. Table 1 provides illustrative examples of strategies colleges have adopted to address identified challenges.

Table 1: Illustrative Examples of Strategies Some Colleges Used to Help Mitigate Challenges Students with Disabilities Face

Challenge	Strategies some colleges employed to help mitigate challenge
Need for self-advocacy	Disability services offices conducted outreach to new students to explain the services they provide and a student's role in requesting and obtaining accommodations. For example, the disability services offices: - made presentations during new student orientation sessions, encouraging students to contact them if needed; - mailed information about their office to incoming students; and - met with students individually to coach them on self-advocacy and how to obtain accommodations.
Changes in academic supports	Disability services offices used a variety of approaches to educate prospective and current students with disabilities about the differences between academic supports in high school and accommodations in college. For example, staff from disability services offices: - made presentations to prospective students at their high schools and as part of college-based information sessions, - held transition workshops for high school educators and parents of students with disabilities, and - conducted outreach to state vocational rehabilitation agencies and dual-enrollment program officials.
Obtaining documentation for accommodations	Disability services offices used flexible approaches to documentation requirements, including: - determining whether a student's type of disability has changed since the last evaluation before deciding to request more recent documentation. For example, if a student had a previously documented visual impairment, the disability services office might not have requested a more recent optometry report. - allowing students to use accommodations temporarily while they waited for the required documentation. - providing a helpful alternative to a specific request for an accommodation that was not supported by the student's documentation (e.g., provide a reduced distraction environment when documentation did not fully support a request for extended time for exams). Disability services offices referred students to services that can provide new documentation. These services: - allowed the campus counseling center to provide disability documentation, especially for mental health conditions; - employed a specialist to help test and document students' learning disabilities; and - referred students to the local vocational rehabilitation services department for documentation or assistive technology. Disability services offices informed prospective, future, and current students about the college's documentation requirements. For example, staff from offices: - participated in information sessions at local high schools to educate prospective students; - distributed Education's guidance documents, including a brief summary of the differences between high school and college; - sent information about the disability services office's practices, policies, and procedures to incoming students; and - hosted periodic workshops for current students to increase awareness of the disability services office and the services available through the local vocational rehabilitation services department.

Faculty reluctance to implement accommodations	Disability services office staff informed faculty of their legal obligation to provide accommodations and helped them comply. For example, they: • presented information at new faculty orientation; • had a college administrator reinforce the message about legal compliance; • enlisted the support of a few well-respected faculty members in getting buy-in from more reluctant faculty; and • trained faculty on how make their courses accessible. Disability services office staff mediated conflicts between students and faculty. For example, they may have: • talked directly with reluctant faculty to hear their concerns and arrive at a solution; or • elevated the issue of non-compliance to college administrators.
Challenges related to remote learning during the pandemic	Colleges and faculty continued to use beneficial practices and technologies they adopted when campuses were closed. For example, they: • provided resources to help educate faculty and staff on using technology; • increased standardization of information posted online; • added online elements into classes held in person, such as regularly posting readings, lectures, and instructional materials online; and • offered some classes in an online format.

Source: GAO analysis of discussions with college disability services officials and students. | GAO-24-105614

Education Works to Mitigate Challenges Faced by Students with Disabilities, but College Officials Report Gaps in Key Information

Education Uses Several Approaches to Address Challenges Faced by Students with Disabilities Transitioning to and during College

Education works to mitigate challenges students with disabilities face in accessing college through several key approaches, including enforcing relevant federal disability laws, monitoring states, issuing guidance, administering grants to support programs, and providing technical assistance. Some of these efforts focus specifically on the population of students with disabilities transitioning to college.

Enforcing relevant federal disability laws. Education's Office for Civil Rights (OCR) works to protect the rights of students with disabilities by investigating complaints alleging discrimination in violation of relevant federal disability laws. From 2012 through 2021, OCR processed over 1,400 disability-related complaints on average per year against

postsecondary institutions, according to our analysis of its data. Of the complaints that OCR did not dismiss,[21] it resolved nearly half—about 170 per year—by (1) conducting an investigation and determining that a violation occurred, (2) reaching agreement (before completing its investigation) on OCR-monitored changes the institution will make, or (3) helping the parties involved resolve the complaint between themselves before completing its investigation.[22] The following text box describes an example of how OCR resolved one complaint.

Example of How OCR Resolved One Disability-related Complaint

In 2021, Education's Office for Civil Rights (OCR) resolved a complaint alleging that a university discriminated against a student who had requested a disability-related testing accommodation. OCR's investigation yielded concerns that the university applied a blanket prohibition on adjustments to testing conditions as an accommodation. The university agreed to create a policy to ensure that the needs of students with disabilities requesting academic adjustments are assessed on an individual basis.

Source: GAO analysis of Education documents. | GAO-24-105614

Monitoring states. Education oversees states' compliance with IDEA and Rehabilitation Act transition service provisions. Education's Office of Special Education Programs (OSEP) monitors state educational agencies' compliance with requirements related to transition services and other requirements under IDEA.[23] For example, OSEP reviews annual state performance plans and reports, and assesses state performance using state-collected data from school districts, among other information.

---

[21]According to OCR's case processing manual, the office will dismiss a complaint, for example, when the allegation(s), on their face or as clarified, do not include a violation of one of the laws or regulations that OCR enforces.

[22]These resolved complaints most commonly pertained to academic adjustments, which is a broad term that encompasses a variety of accommodations, such as extended time on tests, as well as auxiliary aids and services such as note takers and sign language interpreters.

[23]As stated above, beginning no later than the first IEP in effect when the student is 16, a high school student's IEP must include appropriate measurable postsecondary goals based upon age appropriate transition assessments related to education and training, employment, and when appropriate, independent living skills. The student must be invited to IEP team meetings when a purpose of the meeting will be to consider the postsecondary goals for the child and the transition services needed to assist the child in reaching those goals. The Rehabilitation Act requires states to ensure that VR agencies provide, or arrange for the provision of, pre-ETS to students with disabilities in need of such services who are eligible or potentially eligible for VR services.

Education's Rehabilitation Services Administration monitors state vocational rehabilitation (VR) agencies' compliance with pre-employment transition services (pre-ETS) and other requirements under the Rehabilitation Act.

Issuing guidance and other resources. Education provides guidance related to pertinent legal requirements to help eliminate discrimination on the basis of disability against students with disabilities. These resources focus on different topics and audiences and may take different forms. For example, Education's OCR and the Department of Justice's Civil Rights Division issued a "Dear Colleague" letter on online accessibility issues at postsecondary institutions and resources for college officials and other stakeholders (see text box).

Example of Guidance Document from OCR

In May 2023, Education's Office for Civil Rights (OCR) and the Department of Justice's Civil Rights Division jointly issued a "Dear Colleague" letter on postsecondary online accessibility. The letter described current online accessibility challenges, highlighted enforcement actions that improved online accessibility at postsecondary institutions across the country, and provided resources about federal laws that protect the rights of students with disabilities. According to OCR officials, OCR emailed this letter to higher education officials and disability advocates.

Source: GAO analysis of Education document. | GAO-24-105614

Because of the specialized nature of online accessibility issues, OCR has a team dedicated to providing schools with information on how to make their websites and learning management systems accessible for students with disabilities. In May 2022, OCR helped release a 20-part video series covering topics such as applicable federal laws and how to identify and remediate different types of barriers that can interfere with online accessibility for students with certain disabilities.

Education has also published resources that directly relate to challenges we heard about in discussion groups and interviews about preparing students for the transition to college (see table 2).

Table 2: Department of Education Resources on the Transition of Students with Disabilities to Postsecondary Education

Resource	Published by	Year of latest publication
"Dear Parent" letter on the transition of students with disabilities	Office for Civil Rights	2007
"Dear Colleague" letter on the transition of students with disabilities	Office for Civil Rights	2007
Students with Disabilities Preparing for Postsecondary Education: Know Your Rights and Responsibilities pamphlet	Office for Civil Rights	2011
Transition of Students with Disabilities to Postsecondary Education: A Guide for High School Educators pamphlet	Office for Civil Rights	2011
A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities	Office of Special Education and Rehabilitative Services	2020

Source: GAO analysis of Education documents. | GAO-24-105614

Administering grants to support programs. As part of its mission to broaden access to higher education and strengthen the capacity of colleges and universities, Education's Office of Postsecondary Education (OPE) administers grants that support college students with disabilities. Three different types of such grant programs exist. Collectively, these grants had awards of about $30 million in fiscal year 2022.[24]

- **TRIO Student Support Services (SSS).** SSS grants support disadvantaged college students in completing their degrees. About 4 percent of SSS grants exclusively target college students with disabilities. In fiscal year 2022, 52 such SSS grants collectively had awards of about $14 million and supported approximately 6,000 students with disabilities. SSS grants must provide certain services to participating students including academic tutoring, advice in course selection, and assistance in applying for further education and federal financial aid. According to SSS grantees we interviewed, their programs helped participating students overcome challenges in getting and using accommodations. For more information about SSS and how selected grantees recruit and support students with disabilities, see appendix III.

- **Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID).** TPSID grants support higher

[24]In addition to awarding grants that support college students with disabilities, Education administers grants under IDEA to Parent Training and Information Centers. These centers support parents of children with disabilities by providing training and information to help them improve outcomes for their children. One of the many topics these centers may address is students' transition to postsecondary education.

education institutions in creating or expanding inclusive programs for students with intellectual disabilities. With an emphasis on socialization and individualized support, participating students with intellectual disabilities may, for example, audit courses with students without intellectual disabilities. In the last 5 years, TPSID programs served 2,245 students at 57 campuses implementing 27 model demonstration grants. In fiscal year 2022, TPSID-related grants, including one that provided for a coordinating center, totaled $13.8 million.

- **National Center for Information and Technical Support for Postsecondary Students with Disabilities.** This grant program provides for the National Center for College Students with Disabilities, which maintains an online information "clearinghouse" and resource library. This clearinghouse is a resource for current and future college students with disabilities, family members, and others on topics such as paying for college, planning inclusive events, and working with DSOs. The center also advises a national, student-run advocacy organization for students with disabilities with chapters and affiliates across the country. In fiscal year 2022, the center was awarded $1.98 million for use over 4 years.

Providing technical assistance. In addition to resources that it issues broadly, Education provides direct technical assistance and funds a technical assistance center. OCR responds to specific requests for technical assistance in postsecondary contexts. Such assistance has generally taken the form of presentations that provide an overview of OCR and explain postsecondary institutions' obligations under relevant federal disability laws. Examples of audiences for these presentations have included undergraduate students from a university in Washington, administrators and faculty at a technical community college in North Carolina, and the Association on Higher Education and Disability chapter in Utah.

Education also funds a technical assistance center to support states in providing services to students with disabilities transitioning to college. Specifically, OSEP and RSA jointly fund the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). This center's overarching goal is to assist state educational agencies, local educational agencies, VR agencies, and VR service providers in implementing evidence-based and promising practices to ensure that students with disabilities graduate prepared for success in postsecondary education and employment, according to Education officials. NTACT:C

officials explained that they identify specific technical assistance or training needs through internal monthly meetings with staff and technical assistance providers, all of whom work closely with states.

NTACT:C has developed a variety of instructional materials state agencies can use to train their local counterparts on compliance issues and other key information. One of these materials is a checklist—called the Indicator B13 Checklist—that IEP teams can use to guide and document their compliance with the IDEA transition services requirements. Another document, called "Differences Between Secondary and Postsecondary Education," summarizes various differences between secondary and postsecondary education for students with disabilities (see table 3).

Table 3: Key Instructional Materials Related to the Transition of Students with Disabilities to Postsecondary Education Available on the NTACT:C Website

Document title and description	Year published
Postsecondary Education & Training Preparation Toolkit This toolkit contains information and resources about effective practices in postsecondary education and training. It is intended as a resource for students with disabilities, families, service providers, and educators to help them consider options and plan for access and success.	Updated in 2023
NTACT:C Indicator B13 Checklist This document contains a checklist that individualized education program (IEP) teams can use to guide and document their compliance with the Individuals with Disabilities Education Act (IDEA) transition services requirements.	Updated in 2020
Toolkit for Collecting Quality Data for Indicator B13 This toolkit contains information on collecting, verifying, and reporting Indicator B13 data to stakeholders. It also discusses additional steps states can take beyond compliance.	2018
Differences Between Secondary and Postsecondary Education This two-page document highlights differences between obtaining academic supports in high school and accommodations in college.	2017
Summary of Performance Packet This packet contains sample forms and other resources to help IEP teams support students who are graduating or aging out from IDEA-based services.	2016

Source: GAO analysis of National Technical Assistance Center on Transition: The Collaborative (NTACT:C) documents. | GAO-24-105614

NTACT:C uses a variety of methods to disseminate these instructional materials. They are posted on NTACT:C's website, and NTACT:C officials said the center hosts communities of practice and holds webinars to disseminate its materials to state agencies.

College Officials Report That Students with Disabilities Transitioning to College Would Benefit from More Information on Self-Advocacy

According to DSO officials we spoke with, some students lack information and need instruction on self-advocacy as they transition to college. As noted above, college students with disabilities can face challenges obtaining needed accommodations when they lack an understanding of how their role in self-advocacy changes from high school to college. For example, one college official reported students being unprepared to set up meetings for themselves or complete the registration process with the disability services office. Another reported that despite their college's many efforts to disseminate information on their disability-related services, some students assumed that her office was aware of students' disabilities coming into college. Therefore, these students did not request or receive accommodations. This official cited the lack of self-advocacy as a major problem.

Education has issued guidance materials that explain the importance of self-advocacy for students with disabilities in college, but this information may not reach those students transitioning from high school. In 2020, Education published *A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities*. The guide mentions the need for students with disabilities to request accommodations in college. It also links to a pamphlet Education issued in 2011 to help students with disabilities transition from high school to college: *Students with Disabilities Preparing for Postsecondary Education: Know Your Rights and Responsibilities*. However, as evidenced by the accounts of DSO officials we spoke with, this information may not reach IEP teams and the students they support.

Further, the Education-approved checklist that IEP teams can use to guide transition-related efforts does not address the importance of self-advocacy to obtain accommodations in college. Specifically, the Indicator B13 checklist is a tool to help state and local educational agencies evaluate whether IEP teams guide and document the required discussions with students with disabilities about their postsecondary goals and navigate this transition. The checklist contains eight components for IEP teams to address. The components of the checklist address various transition-related requirements related to a student's IEP. However, because the checklist is designed to help IEP teams meet transition services requirements under IDEA, none of the eight components nor related instructions on how to implement the checklist prompt IEP teams to inform students about the need for self-advocacy with respect to obtaining accommodations in college.

Education has highlighted the need to provide students with disabilities preparing to transition to adulthood with the information, services, and supports needed to achieve their goals.[25] In addition, according to federal internal control standards, an organization's external communication, such as guidance materials, should be conveyed in a way that helps the entity achieve its objectives and address related risks.[26]

Education officials noted that encouraging IEP teams to inform students with disabilities who may pursue college about the importance of self-advocacy to obtain accommodations in college is worthwhile. However, the officials explained that Education does not have the authority to require IEP teams to inform students of this. They stated that it would be possible for Education to communicate through state and local educational agencies the importance of IEP teams discussing self-advocacy as part of their planning for transition services. Doing so could help ensure that students with disabilities who pursue college are prepared to obtain needed accommodations.

Education's Online Guidance Covers Accommodations for Students with Disabilities, but College Officials Report Difficulties Staying Current on Key Information

Education maintains online guidance and other resources related to students with disabilities but does not provide DSOs an efficient way to stay current on information related to accommodations for college students with disabilities. Through OCR, Education maintains separate web pages on a variety of issues such as disability discrimination protections, certain disability-related case resolutions, and OCR policy guidance. Education also maintains a publicly available, searchable database of resolutions of disability-related complaints.

Education does not have a way for DSO staff to receive alerts of newly issued guidance and other information specifically about postsecondary education for students with disabilities. For example, Education does not enable users of its case resolutions database to receive an alert when it has issued a new case resolution related to postsecondary education for students with disabilities.

Although DSO officials we spoke with found some of Education's online information generally helpful, they reported difficulties staying current on

---

[25]U.S. Department of Education, Office of Special Education and Rehabilitative Services, *A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities* (Washington, D.C.: 2020).

[26]GAO-14-704G, 62.

the information provided on Education's web pages due to the volume of information and their own high caseloads. For example, based on our analysis of the case resolutions database, OCR adds on average about nine postsecondary disability discrimination cases per month. In addition, with the rising number of students with disabilities, DSO staff face high caseloads. One DSO director cited caseloads of up to 700-800 registered students per counselor. In six of nine meetings with DSO officials, they mentioned the difficulty of staying current on relevant guidance and case resolutions. Several of these officials wanted a way to be notified about new information, such as through an opt-in email.

DSO officials further explained that not having the most recent information negatively affects students because DSOs issue policies that do not reflect the latest output from OCR. For example, one official cited an outdated flexible attendance policy that resulted in some students not receiving approval for appropriate accommodations.

Education's priorities and federal standards highlight the need for prompt communication of guidance and other information affecting college students with disabilities. Education's strategic plan includes an objective to support educational institutions among others to raise academic quality and college completion for all students, especially for underserved students such as individuals with disabilities. In addition, according to federal internal control standards, management should communicate with external parties and select appropriate methods for the communication in light of various factors including whether the information is readily available to the audience when needed.[27]

Education officials cited reasons for not providing the public a way to receive notifications of newly issued guidance and other information about accommodations for postsecondary students with disabilities. According to Education officials we interviewed, opt-in emails generally require additional resources to create content to engage subscribers. However, other federal agencies offer alternatives that do not provide additional content. For example, the Department of Justice allows users to opt in to receive an email when new information is available on specific web pages such as ADA.gov or related news. Further, Education has a way for the public to opt in to receive news related to other topics. For example, it issues separate electronic notifications on topics such as early

---

[27]GAO-14-704G, 63.

learning, special education and rehabilitative services, and vocational rehabilitation.

Education officials also cited the emergence of social media as an increasingly common news source. OCR uses social media and has posted on higher education accessibility. Despite the broad reach of social media, a minority of OCR's posts pertain to disability-related news and even fewer about disability in a higher education context, according to our analysis. As such, many DSO staff may choose not to receive news from OCR via social media.

By providing a way for DSO staff to receive electronic notification of newly issued guidance and other information related to accommodations for college students with disabilities, Education would help ensure DSOs apply its latest guidance. Moreover, doing so would enable Education to communicate efficiently with potentially thousands of DSO staff.[28] It could also preempt one-off questions and complaints that it would otherwise expend resources to address.

Conclusions

Education has worked to ensure equal access to higher education for students with disabilities through multiple efforts, such as assisting colleges with online accessibility and funding academic support services for students with disabilities. However, as the COVID-19 pandemic highlighted, the ever-growing population of college students with disabilities faces diverse challenges.

Many students in this growing population are not prepared to self-advocate for accommodations. By taking steps to encourage state and local educational agencies to assist IEP teams in informing students with disabilities who may pursue postsecondary education about the importance of self-advocacy in obtaining accommodations, Education would help ensure that more students are prepared to obtain needed accommodations in college.

College DSO staff are key to ensuring students with disabilities receive equal access to education. These staff apply Education's guidance, work

[28]The exact number of individuals who would likely opt to receive information from OCR on this topic is unknown. According to Education's most recent data, there are approximately 6,000 higher education institutions in the United States. Many of these institutions employ multiple individuals whose work is focused on the rights of students with disabilities. Education has maintained similarly sized or smaller email distribution lists for other stakeholders such as charter school officials and college presidents.

directly with students to understand their circumstances, and approve accommodations as appropriate. However, many DSO staff have difficulty staying current on relevant information from Education related to accommodations for students with disabilities in higher education. By enabling DSO staff to receive electronic notification of newly issued guidance and other information related to accommodations, Education would be communicating efficiently to those who are best positioned to apply the information. In addition, such notifications may preempt one-off questions and complaints that Education would otherwise expend resources to address.

Recommendations for Executive Action

We are making the following two recommendations to Education:

The Secretary of Education should encourage state and local educational agencies to disseminate resources to assist IEP teams in informing students with disabilities who are considering postsecondary education about the importance of self-advocacy in obtaining accommodations in college. (Recommendation 1)

The Secretary of Education should ensure that the Assistant Secretary for Civil Rights provides DSO staff a way to receive electronic notification of newly issued guidance and other information related to accommodations for students with disabilities in higher education, similar to its existing notifications on other education-related topics. (Recommendation 2)

Agency Comments

We provided a draft of this report to Education for review and comment. In its comments, reproduced in appendix IV, Education generally concurred with our recommendations. Education also provided technical comments, which we incorporated as appropriate.

Regarding our first recommendation, Education agreed with the spirit and purpose of the recommendation and said that it is prepared to encourage state and local educational agencies to inform students with disabilities who are transitioning from high school about the importance of self-advocacy as they consider postsecondary education. However, in a meeting to discuss this recommendation, Education officials explained that our original recommendation to amend the Indicator B13 checklist to include an item on self-advocacy might cause confusion because the checklist is used to guide compliance with requirements for IEP teams. They noted that there is no requirement that IEP teams cover self-advocacy. Education suggested that we focus the recommendation on the dissemination of resources on self-advocacy for students with disabilities who are considering college. To avoid potential confusion, we

modified the recommendation by removing the reference to the B13 checklist. Further, we clarified that state and local educational agencies would disseminate the resources to IEP teams, who would share the information with students.

Regarding our second recommendation, Education concurred and described plans to create an opt-in email distribution list about guidance and other information related to accommodations for students with disabilities in higher education.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report will be available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or curdae@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.

Elizabeth H. Curda
Director, Education, Workforce, and Income Security Issues

List of Addressees

The Honorable Patty Murray
Chair
The Honorable Susan Collins
Vice Chair
Committee on Appropriations
United States Senate

The Honorable Ron Wyden
Chairman
The Honorable Mike Crapo
Ranking Member
Committee on Finance
United States Senate

The Honorable Bernard Sanders
Chair
The Honorable Bill Cassidy, M.D.
Ranking Member
Committee on Health, Education, Labor and Pensions
United States Senate

The Honorable Gary C. Peters
Chairman
The Honorable Rand Paul, M.D.
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Robert P. Casey Jr.
Chairman
Subcommittee on Children and Families
Committee on Health, Education, Labor and Pensions
United States Senate

The Honorable Margaret Wood Hassan
Chair
Subcommittee on Emerging Threats and Spending Oversight
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Tom Cole
Chairman
The Honorable Rosa L. DeLauro
Ranking Member
Committee on Appropriations
House of Representatives

The Honorable Cathy McMorris Rodgers
Chair
The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
House of Representatives

The Honorable Mark E. Green, M.D.
Chairman
The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable James Comer
Chairman
The Honorable Jamie Raskin
Ranking Member
Committee on Oversight and Accountability
House of Representatives

The Honorable Jason Smith
Chairman
The Honorable Richard Neal
Ranking Member
Committee on Ways and Means
House of Representatives

The Honorable Chris Van Hollen
United States Senate

Appendix I: Objectives, Scope, and Methodology

This report examines (1) trends in and characteristics of the population of college students with disabilities; (2) the challenges to accessing education that college students with disabilities face, including any related to the COVID-19 pandemic, and how colleges have mitigated them; and (3) the extent to which the Department of Education helps mitigate these challenges (e.g., through the Federal TRIO programs and other efforts).

This appendix provides details of the data sources used to answer these questions, the analysis we conducted, and any limitations to our analysis. Our scope excluded graduate students but included all types of postsecondary institutions, including non-degree granting schools such as vocational schools.

Data Analysis to Describe the Population of College Students with Disabilities

To describe what is known about the population of college students with disabilities, including the types of conditions they have, we analyzed multiple data sources from Education's National Center for Education Statistics. We selected these sources because they focus on the population of postsecondary students and afford the opportunity to look at changes in the population over time. For each source, we analyzed the most recent data available.

National Postsecondary Student Aid Study (NPSAS). To describe characteristics of the population of college students with disabilities, we analyzed data from NPSAS, a nationally representative study of students enrolled in postsecondary education. NPSAS data come from institutional records, government databases, and interviews with students. Specifically, we analyzed NPSAS data collected every 4 academic years from 2003–2004 through 2019–2020.[1] We excluded data from 2015–2016 because the data on students with disabilities are not comparable to other years. In 2015–2016, Education changed how NPSAS queried about disabilities that year then reverted to its prior method in 2019–2020.

NPSAS collects information on student characteristics from a nationally representative sample of students in postsecondary education, including those with disabilities. Specifically, we analyzed data on the number and rate of undergraduates with disabilities, the types of disabilities they have, the types of schools they attended, and how these numbers have

---

[1]Education collects NPSAS data and the study's longitudinal offshoots by academic year. Consistent with its naming convention, unless specified otherwise in this report, we refer to the studies by the end year. For example, we refer to the NPSAS study that collected data from the 2019–2020 academic year as the 2020 NPSAS.

changed over time. We examined differences between undergraduate
students with disabilities and undergraduate students without disabilities
in terms of demographic characteristics, attendance intensity (e.g., full-
time vs. part-time), and grade point average.

Beginning Postsecondary Students Longitudinal Study (BPS). To
describe the outcomes of college students with disabilities relative to
college students without disabilities, we analyzed data from BPS, a
nationally representative, longitudinal study of individuals who began
postsecondary education. Specifically, we analyzed 2017 data from the
BPS, which tracks students' paths through college by surveying them at
three points in time, including at the end of the sixth year after first
starting postsecondary education. We examined enrollment persistence
and degree attainment for students with disabilities versus those without
disabilities.

Baccalaureate and Beyond Longitudinal Study (B&B). To describe
longer-term labor market outcomes of college students with disabilities
relative to other students, we analyzed data from B&B, a nationally
representative, longitudinal study that tracks degree holders over 10
years. We analyzed B&B data from 2018, the most recent year available.
For B&B, we examined how income levels and employment status
compare between students with versus without disabilities. We also
analyzed how employment status varies by the type of disability.

Because the NPSAS, BPS, and B&B data are based on probability
samples, we calculated estimates using sample weights provided by
Education that reflect the sample design. All estimates presented in this
report from NPSAS, BPS, or B&B have a margin of error at the 95
percent confidence level. Unless otherwise noted, all percentage
estimates are within a 7 percent margin of error, and all estimates of the
number of students or other numbers are within a 9 percent margin of
error. In addition, any differences in estimates presented in this report are
statistically significant, unless noted otherwise.

To assess the reliability of these three data sources, we reviewed related
documentation and interviewed relevant agency officials. We determined
that the data were reliable for our purposes of describing the
characteristics and outcomes of college students with disabilities.

Description of Challenges for College Students with Disabilities

To describe challenges that college students with disabilities face in accessing learning, including any related to the COVID-19 pandemic, we used multiple methods: reviewing academic reports and conducting discussion groups, site visits, and data analysis. The information we gathered from discussion groups, site visits, and interviews with stakeholders is not generalizable, but the approach enabled us to corroborate participant perspectives.

Academic reports and other relevant documents. We reviewed academic reports written between 2016 and 2022 to identify challenges postsecondary students with disabilities face.[2] We used this review to inform the categories of topics we addressed during discussion groups and site visits. Following the discussion groups, we reviewed selected studies in depth to help corroborate testimonial evidence. We assessed the quality of these selected studies by evaluating their research methods and determined that they were sufficiently reliable for our use. We also reviewed relevant agency reports.

Discussion groups. We conducted separate discussion groups with a variety of stakeholders including college disability services office (DSO) officials, students with disabilities, and faculty. Specifically, we conducted five discussion groups of DSO officials who attended the Association on Higher Education and Disability's (AHEAD) annual conference in July 2022. AHEAD is a nationwide organization that provides professional development resources for staff and faculty at postsecondary institutions on topics related to higher education experiences for individuals with disabilities. We invited conference registrants to participate in these discussion groups to ensure institutional variety in terms of geographic location and type (e.g., 2-year and 4-year as well as public and private non-profit). Twenty DSO officials participated in these groups. We also held two discussion groups with three students with disabilities in each. Students were identified based on their participation in national student advocacy organizations (i.e., Disability Rights, Education Activism, and Mentoring, and Partners for Youth with Disabilities). In addition, we held one discussion group with three college faculty representatives selected based on their familiarity with accessibility issues.

---

[2]To identify reports, we searched several databases including ProQuest and Scopus for scholarly work on challenges for postsecondary students with disabilities. Our search terms included types of disabilities (e.g., learning disability), supports (e.g., academic accommodations), and other key context (e.g., higher education, pandemic).

Site visits and interviews. We conducted site visits to four colleges where we interviewed DSO officials and toured their accommodated testing centers. We selected the four colleges based on the factors described above for discussion group participants to ensure institutional variety. We also interviewed national advocates for college students with disabilities selected based on their expertise. Through the site visits and interviews, we spoke with 10 individuals. As we did with the discussion groups, we used the site visits and interviews to obtain input on the challenges students with disabilities face and to inform our assessment of Education's mitigation efforts (see below).

Data analysis. We also examined the percentage of undergraduates, by disability status, who experienced enrollment disruptions through June 2020 due to the COVID-19 pandemic using 2020 NPSAS data. NPSAS student surveys in 2020 began in March, just as the COVID-19 pandemic began affecting students' educational experiences. We used items that were added to the student survey in April to collect data about the early impact of COVID-19 pandemic on students between January 1 and June 30, 2020.

Assessment of Education's Efforts to Mitigate Student Challenges

To identify and assess Education's efforts to mitigate the challenges that college students with disabilities face, we used multiple methods.

- **Interviews with Education officials.** To identify and assess how Education mitigates challenges students with disabilities face in accessing college, we interviewed officials from its Office of Postsecondary Education (OPE), Office for Civil Rights (OCR), Office of Communications and Outreach, and Office of Special Education and Rehabilitative Services (OSERS). We also interviewed officials from OSERS's Office of Special Education Programs and Rehabilitation Services Administration to learn about efforts to mitigate transition-related challenges experienced by new college students with disabilities.

- **Review of Education documentation and relevant federal disability laws.** We reviewed Education documents related to Education's efforts to help ensure access to higher education for students with disabilities. For example, we reviewed Education's internal policy manuals about complaint processing as well as guidance about the transition to postsecondary education for students with disabilities. In addition, we reviewed information about pertinent grants and other efforts to support college students with disabilities. We also reviewed relevant federal disability laws and regulations. For

example, we reviewed regulations related to Section 504 of the Rehabilitation Act and academic adjustments.

- **Interviews with stakeholders.** To gain additional insight into how Education mitigates challenges that students with disabilities face in accessing college, we interviewed stakeholders, including relevant Education grantees knowledgeable about accessibility issues for higher education students with disabilities. Specifically, we interviewed officials from AHEAD as well as the National Technical Assistance Center on Transition: The Collaborative, for their perspectives. In addition, we interviewed officials from six TRIO Student Support Services (SSS) grants to learn how they recruit and support students with disabilities. To ensure different perspectives, we randomly selected three SSS grants that exclusively serve students with disabilities and three that serve both students with disabilities and students without disabilities. The views from these interviews are not generalizable but provided insights and opportunity for corroboration.

- **Discussion groups and site visits.** We used the discussion groups and site visits described above to also inform our assessment of Education's efforts to mitigate accessibility challenges faced by college students with disabilities. Specifically, we used the discussion groups with DSO officials at the AHEAD conference and site visits to get additional perspectives about Education's efforts. Similarly, we used our discussion groups with students with disabilities and faculty to discuss Education's efforts. The views from these discussions are not generalizable but provided insights and opportunity for corroboration.

- **Data analysis.** To help describe Education's efforts, we analyzed OCR enforcement data as well as OPE grant awards. Specifically, we analyzed OCR's case processing data on postsecondary, disability-related complaints closed from 2012 through 2021. We used these data to report the number of complaints that OCR resolved and to determine the most common issue that generated complaints. In addition, we analyzed OPE's award data for grants designed to support college students with disabilities. For example, we analyzed SSS grant award data to report the funding level for this program and the number of students funded to be served in fiscal year 2022. To assess the reliability of these data, we performed electronic testing, interviewed knowledgeable officials, and reviewed relevant documentation. We determined that the data were reliable for our purposes of describing the nature of complaints filed on behalf of

college students with disabilities from 2012 through 2021, as well as SSS grants OPE awarded for fiscal year 2022.

We assessed Education's efforts against its stated goals (e.g., ensure equal access to education) and applicable federal internal control standards. We conducted this performance audit from April 2022 to April 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Additional Data on College Students by Disability Type

Table 4: Estimated Percentage of College Students with Disabilities by Type, 2004–2020

	2004	2008	2012	2020
Hearing impairment	5%	6%	7%	4%
Blindness or visual impairment	4%	3%	4%	4%
Speech or language impairment	0%	1%	0%	1%
Orthopedic or mobility impairment	25%	16%	9%	3%
Specific learning disability or dyslexia	8%	9%	5%	4%
Attention deficit disorder (ADD)	11%	19%	22%	21%
Health impairment or problem	17%	6%	3%	2%
Mental, emotional, or psychiatric condition	9%	11%	14%	21%
Depression	13%	13%	17%	27%
Developmental disability	1%	1%	1%	1%
Brain injury	1%	2%	2%	2%
Other	6%	15%	16%	12%

Source: GAO analysis of National Postsecondary Student Aid Study (NPSAS) data. | GAO-24-105614

Note: "College students" includes undergraduates from postsecondary institutions of all types (e.g., 4-year, 2-year, and less than 2-year). The disability types are for an individual's main condition, so a student with multiple disabilities is counted once. The table excludes 2016 data because NPSAS changed the definition of disability for only that year and reverted to the prior definition in 2020. All percentage estimates are within 2 percent margin of error.

Table 5: Estimated Percentage of College Students by Disability Type and Race and Ethnicity, 2020

	No disability	Physical	Developmental	Behavioral/ emotional	Sensory	Other
White	48%	47%	46%	53%	40%	39%
Black or African American	13%	15%	14%	10%	13%	15%
Hispanic or Latino	21%	19%	24%	20%	29%	28%
Asian	9%	6%	3%	5%	7%	6%
American Indian or Alaska Native	1%	2%	—	1%	0%	2%
Native Hawaiian/other Pacific Islander	1%	—	—	0%	3%	1%
More than one race	8%	11%	9%	10%	7%	11%

Source: GAO analysis of National Postsecondary Student Aid Study data. | GAO-24-105614

Note: A dash indicates that no students were identified as part of the estimate. "College students" includes undergraduates from postsecondary institutions of all types (e.g., 4-year, 2-year, and less than 2-year). The disability types are for an individual's main condition, so a student with multiple disabilities is counted once. "Physical" includes speech or language; orthopedic or mobility; and brain injury impairments. "Developmental" includes specific learning disabilities or dyslexia and developmental disabilities. "Behavioral/emotional" includes attention deficit disorder; mental, emotional, or psychiatric conditions; and depression. "Sensory" includes hearing and blindness or visual impairments. "Other" includes other health impairments or problems. All percentage estimates are within a 6 percent margin of error.

Table 6: Estimated Percentage of College Students by Disability Type and Degree Attainment, 2016–17

	No disability	Physical	Developmental	Behavioral/ emotional	Sensory	Other
Attained bachelor's degree	38%	18%	23%	22%	26%	18%
Attained associate's degree	12%	10%	13%	9%	14%	11%
Attained certificate	9%	7%	11%	7%	6%	10%
No degree, still enrolled	11%	10%	13%	15%	12%	11%
No degree, not enrolled/left without return	30%	54%	40%	47%	43%	49%

Source: GAO analysis of Beginning Postsecondary Students Longitudinal Study data. | GAO-24-105614

Note: This table includes individuals who first began a postsecondary undergraduate program regardless of level in 2011–2012 and measures the cumulative outcome of enrollment through the end of 2016–2017. The disability types are for an individual's main condition, so a student with multiple disabilities is counted once. "Physical" includes speech or language; orthopedic or mobility; and brain injury impairments. "Developmental" includes specific learning disabilities or dyslexia and developmental disabilities. "Behavioral/emotional" includes attention deficit disorder; mental, emotional, or psychiatric conditions; and depression. "Sensory" includes hearing and blindness or visual impairments. "Other" includes other health impairments or problems. All percentage estimates are within a 20 percent margin of error.

Table 7: Estimated Percentage of College Graduates Employed Full-Time 10 Years after Completing a Bachelor's Degree by Disability Type, 2018

	No disability	Physical	Developmental	Behavioral/ emotional	Sensory	Other
Employed full-time	78%	66%	69%	70%	76%	74%

Source: GAO analysis of Baccalaureate and Beyond Longitudinal Study data. | GAO-24-105614

Note: The disability types are for an individual's main condition, so a student with multiple disabilities is counted once. "Physical" includes speech or language; orthopedic or mobility; and brain injury impairments. "Developmental" includes specific learning disabilities or dyslexia and developmental disabilities. "Behavioral/emotional" includes attention deficit disorder; mental, emotional, or psychiatric conditions; and depression. "Sensory" includes hearing and blindness or visual impairments. "Other" includes other health impairments or problems. All percentage estimates are within an 18 percent margin of error.

Appendix III: Additional Details on Education's TRIO Student Support Services

This appendix provides details on the background and purpose of the Federal TRIO programs (TRIO), as well as information on how the TRIO Student Support Services (SSS) programs recruit and serve college students with disabilities.

The Federal TRIO programs are authorized under the Higher Education Act of 1965, as amended (HEA), and are administered by the Department of Education's Office of Postsecondary Education. The purpose of the TRIO programs is generally to promote achievement in postsecondary education among disadvantaged students. While TRIO programs primarily serve low-income individuals who are or would be first-generation college students, two programs—SSS and Veterans Upward Bound—also target individuals with disabilities. For example, the HEA states that part of the program design for the SSS program—one of the largest TRIO programs—is to foster an institutional climate supportive of students with disabilities. While the majority of SSS grants are classified as "regular" grants, meaning they serve low-income and first-generation students as well as students with disabilities, a smaller percentage of grants exclusively serves students with disabilities (see table 8).

Table 8: Funding Amount and Number of Students Served by TRIO Student Support Services Regular and Disability-Focused Grants, Fiscal Year 2022

	Regular grants	Grants exclusively serving students with disabilities
Number of grants	954	52
Percent of total SSS grants	82%	4%
Funding	$312,164,954	$14,252,202
Number of students funded to serve	183,478	6,088

Source: GAO analysis of Department of Education grant award information. | GAO-24-105614

Note: Education classifies "regular" Student Support Services (SSS) grants as those serving low-income and first-generation students as well as students with disabilities. In fiscal year 2022, Education also awarded SSS grants that exclusively served specific populations like students with disabilities. The remaining types focused on veterans; English as a second language learners; students in a science, technology, engineering, or mathematics field; and students preparing to be teachers.

Students must meet certain requirements to be eligible to participate in SSS. To participate, students must be enrolled at a grantee institution (or accepted for enrollment in the next academic term at that institution), have a need for academic support to successfully pursue a postsecondary education program, and be at least one of the following: a low-income individual, a first-generation college student, or an individual

with a disability.[1] Students must also be U.S. citizens or nationals or meet the residency requirements for federal student financial assistance.

The SSS grantees we interviewed recruited students with disabilities in several ways.[2] The three grantees that exclusively served students with disabilities recruited them primarily through their college's disability services office (DSO). Officials from one of these programs also hung flyers around campus, but said most recruitment occurs via referrals from DSO counselors. Of the three regular grantees we interviewed, one of them recruited students with disabilities through referrals from the DSO in addition to referrals from faculty and visiting classrooms to discuss the program. Another recruited students at the school's freshman orientation by asking every incoming student to fill out an application. Eligible students, such as those who indicated that they had an approved plan for accommodations in high school, received a follow-up from the program. The official from the remaining regular program did not actively recruit students with disabilities but said most students who join come on their own. Additionally, the grantees we interviewed posted applications online for interested students to complete. Five of the six applications asked students their disability status. The remaining application indicated on the form that the program was specifically for students with disabilities.

SSS grantees must provide certain services to students. Required services include academic tutoring, assistance with postsecondary course selection, financial literacy training, and assistance with transferring from 2-year to 4-year schools or to graduate programs, among others. All of the SSS grantees we interviewed said they supported students by providing the services required of them.

SSS grantees are also permitted to provide additional services that are not required by law. Each of the SSS grantees we interviewed provided such services. For example, two grantees provided cultural enrichment opportunities for students. For one of the grantees, this meant planning a trip for students to see a play, which, according to the SSS director, would

---

[1]For more information on the Federal TRIO programs including SSS, see GAO, *Department of Education: Additional Data Collection Would Help Assess the Performance of a Program Supporting College Students with Disabilities*, GAO-23-105551 (Washington, D.C.: Feb. 15, 2023).

[2]To gain an understanding of how TRIO SSS programs identify and support students with disabilities, we interviewed officials from six SSS grants. We randomly selected three regular grants and three grants that exclusively serve students with disabilities. Results from these interviews are not representative of all TRIO SSS grants but provide examples of how SSS grants support students with disabilities.

likely be a first-time experience for many students in the program. Another offered experiential training opportunities for students, such as a biology workshop hosted over a weekend.

Additionally, five of the six grantees we interviewed offered peer mentoring in which students were paired with returning or upper-class students for mentorship and guidance. At one of the SSS programs, peer mentors were trained to work with students in areas of concern, such as organizational strategies, decision-making and study skills, and time and life management. The director of another program said the purpose of their peer mentoring program was developing student leadership. In this program, a student's peer mentor would assist them with pursuing leadership roles in areas of interest, such as student government. The SSS director told us that students were more likely to participate in the discretionary services. For a complete list of required and discretionary services, see table 9.

Table 9: Legally Required and Discretionary Services to Be Provided to Students through TRIO Student Support Services Grants

Required services	Discretionary services

• Academic tutoring, directly or through other services provided by the institution, to enable students to complete postsecondary courses, which may include instruction in reading, writing, study skills, mathematics, science, and other subjects
 	
• Advice and assistance in postsecondary course selection
 	
• Information on both the full range of federal student financial aid programs and benefits (including Federal Pell Grant awards and loan forgiveness) and resources for locating public and private scholarships
 	
• Assistance in completing financial aid applications, including the Free Application for Federal Student Aid
 	
• Education or counseling services designed to improve the financial and economic literacy of students, including financial planning for postsecondary education
 	
• Activities designed to assist participants enrolled in 4-year institutions of higher education in applying for admission to, and obtaining financial assistance for enrollment in, graduate and professional programs
 	
• Activities designed to assist students enrolled in 2-year institutions of higher education in applying for admission to, and obtaining financial assistance for enrollment in, a 4-year program of postsecondary education
	• Individualized counseling for personal, career, and academic matters provided by assigned counselors
	
	• Information, activities, and instruction designed to acquaint participating students with the range of career options available to them
	
	• Exposure to cultural events and academic programs not usually available to disadvantaged students
	
	• Mentoring programs involving faculty, upper-class students, or a combination thereof
	
	• Securing temporary housing during breaks in the academic year for—
	    o Students who are or formerly were homeless children and youth; and
	    o Foster care youth
	
	• Programs and activities that are required, and most programs and activities that are discretionary, that are specially designed for students who have limited English proficiency, students from groups that are traditionally underrepresented in postsecondary education, students who are individuals with disabilities, students who are homeless children and youth, students who are foster care youth, or other disconnected students
	
	• Other activities designed to meet the purposes of the Student Support Services program

Source: 34 C.F.R. § 646.4. | GAO-24-105614

SSS grantees may also support students with disabilities by helping them overcome challenges related to acquiring accommodations. For example, one official, whose program served only students with disabilities, told us the program's most popular service was "enhanced academic advising." This included advising for topics such as speaking with professors, who, according to officials we interviewed, might be reluctant to accommodate students with disabilities. Another disability-only SSS grantee, which operated out of the school's DSO, said their staff had 20 to 40 hours of training per year on disability rights, enabling staff to help inform students of their rights in college.

The three regular grantees we interviewed discussed referring students to the DSO for accommodations. For example, one program director told us that some students who join the SSS program under the low-income or first-generation criteria may be reluctant to self-report an "invisible disability," such as a mental health condition. The director said they encourage these students to register with the DSO because it helps the SSS program be more successful in providing accommodations and support. Another director told us that if students in the SSS program have a disability, the program helps them get the accommodations and services they need by referring them to the DSO to register for accommodations.

UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202

April 9, 2024

Ms. Elizabeth Curda
Director
Education, Workforce, and Income Security Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Curda:

Thank you for providing the U.S. Department of Education (Department) the opportunity to review the U.S. Government Accountability Office's (GAO's) draft report titled, "Higher Education: Education Could Improve Information on Accommodations for Students with Disabilities (GAO-24-105614)."

We appreciate GAO's work on examining resources and challenges for students with disabilities as they transition from high school to postsecondary opportunities. We also appreciate GAO's consideration of our comments below on the draft GAO report recommendations. As the Assistant Secretaries for the Office of Special Education and Rehabilitative Services (OSERS) and the Office for Civil Rights (OCR), we are pleased to respond to the two recommendations below as they respectively relate to the work of the OSERS and OCR within the Department.

Recommendation 1: The Secretary of Education should work with the Department's technical assistance partner (NTACT:C) to amend the Indicator B13 checklist by adding a question and related instructions to capture whether students with disabilities who may pursue college are informed about their need for self-advocacy with respect to obtaining accommodations in college.

Response: The Department concurs with the spirit and purpose of GAO's recommendation and is prepared to encourage state and local educational agencies (SEAs and LEAs) to inform children with disabilities under the Individuals with Disabilities Education Act (IDEA) who are graduating high school and considering postsecondary education options, particularly college, about their need for self-advocacy and potential accommodations in college. To address this recommendation, the Office of Special Education and Rehabilitative Services (OSERS) proposes to identify and disseminate to SEAs and LEAs resources on self-advocacy and how to inform children with disabilities under IDEA who are transitioning out of high school and considering postsecondary education options, such as college.

Toward this end, the Department suggests that GAO clarify its recommendation to focus on encouraging and disseminating resources on self-advocacy and the higher education process to SEAs and LEAs to assist children with disabilities under the IDEA who are considering postsecondary education options, particularly college.

1

Recommendation 2: The Secretary of Education should ensure that the Assistant Secretary for of Civil Rights provides [Disability Services Office] DSO staff a way to receive electronic notification of newly issued guidance and other information related to accommodations for students with disabilities in higher education, similar to its existing notifications on other education-related topics.

Response: The Department concurs with GAO's recommendation. To address the recommendation, the Office for Civil Rights (OCR) will work with the Department's Office of Communications and Outreach to create an opt-in email distribution list for receiving notifications of guidance and other information related to different aspects of OCR's work, including a separate opt-in list for those interested in accommodations for students with disabilities in higher education. Individuals will be able to subscribe to these lists through the Department's website, similar to other Department subscription lists.

We appreciate GAO's work on identifying opportunities to improve the postsecondary transition process for students with disabilities in understanding, as they explore postsecondary options, the need for self-advocacy and how accommodations work in higher education. We also appreciate the opportunity to comment on the draft report and GAO's consideration of our comments as the report is finalized.

Sincerely,

/s/   /s/

Glenna Wright-Gallo   Catherine E. Lhamon
Assistant Secretary   Assistant Secretary for Civil Rights
Office of Special Education and
Rehabilitative Services

2

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact	Elizabeth H. Curda, (202) 512-7215 or curdae@gao.gov
Staff Acknowledgments	In addition to the individual named above, Erin Godtland (Assistant Director), Joel Green (Analyst in Charge), Jennifer Cook, Katie Hickman, Gina Hoover, John Mingus, and David Reed made key contributions to this report. In addition, key support was provided by James Bennett, Peter Choi, Sara Daleski, Steven Flint, Alex Galuten, Michael Murray, Nhi Nguyen, Jessica Orr, and Lindsay Shapray.