July 14, 2025

John B. King, Jr.
Chancellor
State University of New York
SUNY System Administration
State University Plaza
353 Broadway
Albany, NY 12246

Re: Oversight of Disability Services
Report 2025-F-7

Dear Chancellor King:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by officials of the State University of New York to implement the recommendations from our initial audit report, *Oversight of Disability Services* (Report 2021-S-42).

Background, Scope, and Objective

The State University of New York (SUNY) is the largest comprehensive system of public higher education in the nation, comprising 64 institutions (14 of which are University Centers and Doctoral Degree Granting Institutions), including research universities, academic medical centers, liberal arts colleges, community colleges, colleges of technology, and an online learning network. In the fall 2023 semester, SUNY served approximately 367,500 students. During the 2023-24 academic year, 39,740 students self-reported a disability at the campuses.

SUNY's System Administration (SUNY Administration) provides support to the Campus Coordinators of Disability Services (Coordinators) on all campuses. The Coordinators meet with students who experience disability-related barriers with regard to any aspect of college life (e.g., physical environment, housing, parking, communication, dietary needs, academic requirements). Students with disabilities meet with their Coordinator to identify needs, provide appropriate disability documentation, and arrange for reasonable accommodations. Accommodations may include but are not limited to test-taking modifications, note-taking assistance, print materials in an alternative format, auxiliary aids, assistive technologies, and auxiliary services. Campuses must report all students (undergraduate and graduate) who self-identify as experiencing one or more disabilities and are enrolled in at least one credit-carrying course to the State Education Department (SED) for them to be included in the Higher Education Data System (HEDS), which is used to collect and distribute information annually on the status of higher education in New York State.

Each fiscal year, SUNY Administration develops a Master Capital Plan that identifies construction and rehabilitation projects with the goal to protect, maintain, preserve, and modify

its physical plant to comply with health and safety codes, including the ADA (Americans with Disabilities Act) Standards for Accessible Design. Additionally, campuses have their own Facility Master Plan that evaluates existing space inventories, usage, and condition to accommodate need. Both the Master Capital Plan and campuses' Facility Master Plans incorporate projects to address accessibility.

The objective of our initial audit, issued August 9, 2023, was to determine whether SUNY had adequately provided access to campuses, programs, and services to students with disabilities. The audit covered the period from July 2018 through June 2021 and our observations of accessibility through October 2022. The audit found that the six campuses reviewed (Binghamton University, Maritime College, Stony Brook University, SUNY Morrisville, SUNY Cobleskill, and SUNY Oneonta) provided academic accommodations, outreach, and training to students and staff about their services and received no complaints regarding discrimination based on a student's disability. However, the audit also found SUNY Morrisville failed to adequately document that some students didn't complete the disability self-reporting process and there were inconsistencies in how campuses reported students with disabilities to SED within HEDS. Additionally, while the six campuses were ADA-compliant, we identified 170 areas where accessibility could be improved. Many of these areas were related to the height of certain amenities or fixtures such as bathroom sinks, mirrors, and soap dispensers.

The objective of our follow-up was to assess the extent of implementation, as of May 2025, of the four recommendations included in our initial audit report.

Summary Conclusions and Status of Audit Recommendations

SUNY officials have made significant progress in addressing the problems we identified in the initial audit report. Of the report's audit recommendations, all four have been implemented.

Follow-Up Observations

To SUNY Administration:

Recommendation 1

Continue to work with SED to provide training and education to campuses to accurately and consistently report data on students with disabilities.

Status – Implemented

Agency Action – SUNY has worked with SED to train and educate campuses to more accurately and consistently report data for students with disabilities. In February 2024 and April 2025, SUNY hosted presentations by SED staff focusing on campuses' reporting of students with disabilities to SED. In addition, SUNY hosted a multi-day SUNY Disability Professionals conference in January 2025 where officials from SUNY's Institutional Research Office presented on students with disabilities data. Furthermore, the agenda for SUNY's Institutional Research Community meeting in January 2025 also included the topic of student disability data reporting.

To Campuses:

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<u>Recommendation 2</u>

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Maintain sufficient documentation for students with disabilities who don't follow through with the process to obtain accommodations.

Status – Implemented

Agency Action – SUNY Morrisville has improved its documentation for students who do not follow through with requests to obtain accommodations. SUNY Morrisville was identified in our original audit for not adequately documenting that certain students did not complete the disability self-reporting process. Due to this lack of documentation, we couldn't determine if these students should have received accommodations. During our follow-up visit to SUNY Morrisville, we saw evidence in the students' files of follow-up outreach, such as emails and phone calls to those who had not completed the self-reporting process. We also saw evidence documenting outreach and follow-up that ultimately led students to complete the process and obtain an accommodation plan. Additionally, SUNY Morrisville is working on implementing a new system that will help electronically manage the process for tracking student disabilities and accommodations.

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<u>Recommendation 3</u>

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Accurately and consistently report students with disabilities in accordance with SED requirements.

Status – Implemented

Agency Action – Binghamton University (Binghamton) has improved the accuracy and consistency of its reporting of students with disabilities to SED. Binghamton was identified in our original audit for not reporting students with disabilities to SED until an accommodation plan was created, rather than when a student self-identified as having a disability as required. A follow-up analysis of data reported to SED shows that the number of students with disabilities reported by Binghamton has increased. This supports that Binghamton now includes those students with a disability but without an accommodation plan, whom it had previously excluded from its reporting. For the 2021-22 academic year, Binghamton reported 1,457 students with disabilities to SED. The number reported increased to 2,112 for the 2022-23 academic year and to 2,310 for 2023-24. In addition to this analysis, during our follow-up visit to Binghamton, we identified students who had not received an accommodation plan but were included in the number reported to SED.

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<u>Recommendation 4</u>

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Continue to actively evaluate and improve accessibility and incorporate the potential improvement areas identified where feasible.

Status – Implemented

Agency Action – SUNY continues to evaluate and incorporate improvements to accessibility where feasible. For the campuses in our initial audit, a list of funded capital projects that were started or scheduled to start in August 2023, after our audit report was issued, included various renovation and rehabilitation projects of buildings, elevators, and

walkways. Among the projects listed were eight that specifically referenced ADA or accessibility improvements and one to conduct an ADA study of a campus.

Major contributors to this report were Brian Krawiecki, Charles Lansburg, Matthew Helfant, and Melissa Persaud.

We thank the management and staff of SUNY and its campuses for the courtesies and cooperation extended to our auditors during this follow-up.

Very truly yours,

Theresa Podagrosi
Audit Manager

cc: Amy Montalbano, State University of New York