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## **AN APPROACH FOR DEVELOPING NATIONAL GUIDELINES FOR POSTSECONDARY SUPPORT SERVICES PROGRAMS**

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### **Abstract**

This paper presents a case for developing standards for specialized support programs serving deaf students in postsecondary institutions. A step-by-step plan for producing standards for the evaluation, development, and accreditation of these programs is outlined. Criteria for forming flexible standards which (1) account for variations in program size and type and (2) enhance support services which make postsecondary education more accessible for deaf students are clarified. The importance of teamwork between postsecondary specialists and generalists to link standards for special service programs to the process of accrediting regular institutions of higher education is emphasized. An example of accrediting a special college for deaf students is discussed. Results from a process of setting priorities for future actions in developing program standards which emerged from a professional conference are reported. Expected benefits of these standards to enhancing program quality are described.

nation's 3,700 colleges and universities are 150 specialized postsecondary programs serving deaf students. Two factors make these programs "special." One is the students themselves, most of whom have an early onset of severe to profound deafness which is frequently accompanied by difficulties in learning to develop competencies in English (Schroedel & Watson, 1991). The other factor is the unique programmatic support services provided for these students to access and complete their postsecondary training. Furthermore, these special programs operate in many ways similar to yet dissimilar from campus service programs for students without disabilities. As will be explained, these joint conditions of special programming within general institutions of higher education pervade any discussion of standards for these service programs.

Since the number of these special postsecondary programs increased from 1 in 1965 to 150 in 1991, issues related to program quality have become as important as those on program quantity. A particular concern is the lack of uniform and consistent standards to assess the caliber of support services and competencies of service providers. To clarify this issue, there are

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Special education for deaf students occupies a vital place in general higher education. Among the

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two other aspects of postsecondary education where new standards are not needed. First, academic accreditation is not a problem since most of the host institutions for the 150 special programs are certified by regional accreditation associations. Second, certification of career preparation and vocational training fields is a separate topic because these occupational instruction areas are accredited by their own specific trade or professional associations.

### Why Are National Standards Needed?

Several existing conditions underlie the need for more contemporary program standards for special support services. One is the fact that present postsecondary standards and guidelines are either outdated, incomplete, or irrelevant to programs with deaf students. The 1973 guidelines developed by the Conference of Educational Administrators Serving the Deaf (CEASD), for example, provide a blueprint for establishing, but not operating, such programs (Stuckless, 1973). These criteria were helpful when special postsecondary programs rapidly expanded during the 1970s and 1980s, but are less applicable today. The Section 504 regulations, in turn, identify some support services needed by students with disabilities in higher education, but are otherwise limited in their scope of coverage (U.S. Department of Education, 1980). Furthermore, court decisions testing the 504 regulations have generated few legal precedents helpful to postsecondary educators of deaf students (Charmatz, 1986). While the periodical editions of College and Career Programs for Deaf Students amply describe the 150 specialized programs, almost 60% of these programs cannot meet the basic criteria for full description in these guides (Rawlings, Karchmer, & DeCaro, 1988; Rawlings, Karchmer, DeCaro, & Allen, 1991; Rawlings, Karchmer, DeCaro, & Egelston-Dodd, 1986). The Association for Higher

Education and Disabilities (AHEAD) collaborated with the Council for the Advancement of Standards (1986) to develop a set of criteria for campus student service programs; however, these are too general for support service programs for deaf students.

Another reason for forming national standards comes from the need for programs to be accountable to the consumers of their support services. Deaf students, their parents, and vocational rehabilitation counselors consider the reputation of a program, the adequacy of support services, and a student's prospects for obtaining a good education or vocational training before selecting it (El-Khiami, 1987; Schroedel & Watson, 1991). All of these factors point to the importance of program quality. More relevantly, a national survey of vocational rehabilitation counselors, secondary and postsecondary educators, as well as leaders and advocates of deaf people was conducted to assess their opinions on issues in the postsecondary training of deaf students. Among the more than 300 survey respondents 84% supported program accreditation and 75% supported national standards for these programs (Schroedel & Watson, 1991). Other analyses of these results found no significant differences between the viewpoints of postsecondary educators and other groups of survey participants on these two topics (Innes, 1985). These findings suggest that there is a national baseline of support among key groups in favor of standards and accreditation to ensure the quality of support services at special postsecondary programs.

### Key Principles for Developing Standards

A pivotal first step in the development of national standards is selecting the general principles by which specific guidelines for program quality will evolve. What are the keystones for constructing these standards? Among all the

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characteristics of special postsecondary programs analyzed by researchers that of program size, as indicated by the number of deaf students on campus, had the strongest influence upon the availability of support services. If the criterion of an enrollment of at least 30 deaf students is used to ensure the provision of major support services, then only 20% of the 150 postsecondary programs would meet this requirement (Armstrong, Schneidmiller, White, & Karchmer, 1983; DeCaro, Karchmer, & Rawlings, 1987; Rawlings & King, 1986). Furthermore, larger programs are more likely to have more accessible campus services, as this is measured by the percentages of deaf students using these services (Schroedel & Watson, 1991). However, it is important to point out that the smaller programs are integral units in the nation's system of specialized postsecondary education for deaf students. They provide local access for those students who prefer to remain near home, educate the majority of part-time deaf students, and are an important bridge for students at two points of transition: from high school into postsecondary training and from two-year programs to four-year programs (Schroedel & Watson, 1991; Watson, Schroedel, & El-Khiami, 1988).

These patterns present a dilemma: whereas larger programs are more likely to have a wider range of support services and staff specialists, smaller programs also perform important functions in the postsecondary education of deaf youth. How can national standards accommodate this dilemma? Several approaches can be taken to adjust national standards to fit this diversity of programs. One would be to have different sets of standards for small, medium, and large sized programs. Another would be to include an element of flexibility in these standards so that smaller programs could be expected to provide reasonable accommodations without "undue hardship."

Another principle is adapting national standards for support services at several types of host institutions. One set of standards, for example, will be more applicable to rehabilitation facilities that assist deaf students who need extensive remedial academic instruction, psycho-social adjustment services, and supervised housing. These standards could be adapted from those set by the Council on Accreditation of Rehabilitation Facilities. Another quite different set of standards will be more appropriate for four-year colleges and universities which primarily provide interpreters, notetakers, and tutors as needed for the academic mainstreaming of their deaf students. A third set of standards will be more relevant to two-year programs such as community colleges or technical institutes, although a further distinction between these two types of two-year programs may need to be considered.

In addition, the standards for accreditation of special programs would appropriately focus on both the availability and accessibility of support services. These are not identical concepts. The availability of a given support service, such as tutoring, refers to the actual provision of the service. The accessibility of a support service is defined by the means used to overcome communication barriers so that deaf students can in fact use the service. Such means may include interpreters, signing staff, assistive listening devices, TDDs, computers, and other technology. In this context, a given standard may set a criterion that a service be accessible, but lets each program determine the most appropriate means by which a service becomes accessible. Giving programs flexible options in meeting accessibility directives in accord with the different needs of their deaf students will enhance the utility and acceptability of the standards. Criteria for these options would also be connected to program size and type.

Related to this concept of forming multiple standards is the issue of whether or not a common core of standards for essential support services is

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to be simultaneously required for all postsecondary programs serving deaf students despite dissimilarities in their size and type. This common core of standards may very likely be necessary. The strategy of developing multiple standards will help the "standards adapt to the programs." At the same time, an essential purpose of standards is to encourage "programs to adapt to the standards" with the goal of upgrading program quality. Setting basic criteria for excellence and access in support services delivery in the face of wide differences among programs will be a significant challenge to postsecondary professionals. The means for addressing this challenge may lie in the methods in which these standards are developed and implemented.

What plan of action will be needed to form these standards? As a first step during 1992, the Council of Directors of the National Consortium of Postsecondary Programs, consisting of the six federally funded programs: California State University at Northridge, Gallaudet University, the National Technical Institute for the Deaf, St. Paul Technical College, Seattle Central Community College, and the Postsecondary Education Consortium (University of Tennessee, Knoxville), approached the CEASD to update the 1973 guidelines. Ross Stuckless, who chaired the group which prepared these guidelines, now chairs a new task force to act upon this request. This group may want to reach out to the expertise available through the membership of the AHEAD Special Interest Group (SIG) on Deafness/Hard of Hearing and the Committee on Services to Hearing-Impaired Persons within the Council of State Administrators of Vocational Rehabilitation (CSAVR).

This task force could then draft standards to assess the quality and accessibility of support services. Reviewers of these proposed standards could include coordinators at the 150 special programs. The revised standards could then be pilot tested at a representative sample of programs

taking their type and size into consideration. The data collected during this trial period could be used to assess and demonstrate the relevancy, applicability, and generalizability of the standards. The pilot testing stage could also help develop a pool of postsecondary educators with the skills to effectively peer evaluate other programs.

### Program Evaluation, Accreditation, and Development

Once national standards are established a well-organized accreditation process is pivotal to their successful implementation. Significant leadership in this task can come from the coordinators of postsecondary programs for deaf students. These professionals can view accreditation of programmatic support services as a natural step in a process of program evaluation, certification, and development. Three outcomes of this process are: (a) identifying program strengths and weaknesses, (b) setting benchmarks for future programmatic improvements, and (c) accrediting the program in accord with the standards fitting its category.

Many programs have undertaken some form of self-study or self-evaluation using various criteria. These experiences can lead program coordinators and staff into the next stage which is that of a peer evaluation process that calls for a team of external reviewers to visit a campus to evaluate its key components relative to national standards, then providing feedback to program and institutional managers. The site visit team later prepares a comprehensive written report of the evaluation results to assist these administrators in identifying priority areas for development or renovation.

Peer evaluation is widely used in the southeastern states by the Postsecondary Education Consortium (PEC, 1990) and its nine affiliated colleges. In assessing programs PEC-trained

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evaluators recognize that an effective specialized support services program is an integral component within its host institution. Accordingly, the site visit team evaluates the support services delivery system within a larger framework which includes program and institutional objectives, administration, funding, plant facilities, staff development, and instructional programs (Ashmore & Woodrick, 1990; Petty, 1986). These evaluation components are also widely utilized by various regional associations for academically accrediting institutions of higher education. This raises the possibility that, over the long run, evaluation of special support service programs may ultimately fit into the general process of academic accreditation for host institutions. Effectively merging these two processes may save program staff considerable paperwork, time, and money, and may enhance prospects for broader acceptance of the standards and accreditation of special services. The keystone for this bridge appears to be that of articulating specific, yet flexible, guidelines and criteria for evaluating special support service programs for deaf students which are compatible with the standards and procedures used for accrediting their host institutions.

However, during the initial stages of implementing proposed new standards, it may be more practical to assist postsecondary education institutions to improve upon quality of services by adopting a PEC-like peer review process. Postsecondary institutions may require the guidance and direction that a peer review offers before they become receptive to another specialized accreditation process. Needless to say, both specialists and generalists in higher education need to work together to achieve a workable and effective program evaluation and accreditation process.

Rees (in press) presented several strategies to enhance the acceptability of special program standards to general collegiate accreditation bodies. First, there is a need to develop standards for specialized campus units which can be applicable to the regular process of accrediting general institutions. Second, it is advisable not to state standards for special service programs in quantitative needs such as the number of personnel, their required competencies, specific office space, or special equipment. College administrators generally resist such standards because they usually lead to reallocating campus resources and may be irrelevant to program quality. Coincidentally, Rees added that institutional accreditation is required in order to receive federal funds, such as student financial aid. Some persons may interpret this observation to mean that standards based upon making programs accessible for deaf students may meet the dual requirements of affirmative action and utility of the special standards to general accreditation bodies.

Furthermore, Rees suggested linking program excellence to qualitative criteria based upon students' educational outcomes. However, research indicates that there is not a straightforward relationship between student use of special campus services and their postsecondary attainments. Factors related to the use of support services by deaf students include their race and age, as well as type and size of program attended (Schroedel & Watson, 1991). Since these variables also independently correlate with postsecondary student attainments, such as level of degree earned, it is difficult to clearly identify which of these student and program variables directly relate to either use of program services or to student educational outcomes.

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### Accrediting a Special College: A Model Example

Understanding the process of academically evaluating colleges by regional accreditation associations provides insights into how standards for special support services may be linked to this process. Two of the three authors of this article were invited to join the accreditation team from the Commission on Higher Education of the Middle States Association (CHE/MSA) to visit a special institution for deaf students and review its program as part of its application for continued accreditation. For the purpose of maintaining confidentiality of the actual review of this specific program, one of these authors reports below on an inside view of the general steps in the accreditation process arising from a self-study approach at a typical college.

Prior to the arrival of the accreditation team, the team chair usually visits a university to get the feel of the institution, assess its readiness for the evaluation visit, and identify any matters needing special attention. Next the accreditation team is instructed to review the university's self-study report and supporting documents which provide the necessary background about the university and are essential to the team's understanding of the context in which it will be working.

The team members also received from the Commission two documents which greatly expanded their perspectives about the forthcoming assignment. The Handbook for Evaluation Team Members (CHE/MSA, 1990a) discusses the team's role in the accrediting process, the ethics of an evaluation team visit, in addition to the institution's preparation for the evaluation and team visit. Procedures and guidelines are outlined for preparing the team member reports and the committee's evaluation report. A range of prospective levels of accreditation is briefly discussed.

The other publication is Characteristics of Excellence in Higher Education: Standards for

Accreditation (CHE/MSA, 1990b) which is intended as a guide to institutions as they strive for excellence and for evaluators as they assess institutional achievement. The accrediting process at its best reflects continuing interaction between individual institutions and the Commission on Higher Education through the means of self-study, planning, evaluation, and accreditation. The following characteristics are described in the manual: institutional integrity; mission, goals, and objectives; planning and resource allocation; program and curricula; outcomes and institutional effectiveness; admissions; student services; the faculty; organization and administration; governing board; budgeting and accounting; library, learning, and experimentation; and catalogs, publications, and promotional materials.

The campus visit usually requires two and one half days with the university arranging travel and reimbursing team members for their related expenses. The team normally arrives Sunday afternoon for a reception and dinner with the university's president and leading administrators and then meets afterwards to assign focus areas to each team member. On Monday the team meets with various campus groups including administrators and representatives from the faculty council, the board of trustees, and student body. Each team member then meets with individual deans, directors, or other appropriate persons. That evening the team convenes to share perceptions from these meetings and develop strategies for outlining individual team member reports. The agenda for the next day and one-half is also reviewed.

On Tuesday individual team members meet with selected groups and individuals to discuss their respective focus areas. That evening the team members reconvene to share their notes of their various meetings. General discussion about recommending a certain level of accreditation takes place before the team members write their individual reports. Specific issues, concerns, and

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recommendations regarding their primary areas of assignments are included in these reports. On Wednesday, some team members continue visits with campus resource persons as needed. Team members' reports are shared with the team chair who then summarizes the highlights of the team's campus visit during a short exit interview with the university's president and central administrators.

Within two weeks, the team chair drafts a report of the site visit which includes recommendations and considerations for accreditation. Within six months, the university president receives official word from the Commission specifying a certain level of accreditation with conditions, if any. The university is to submit a progress report in the middle of the ten-year period of accreditation to ensure its consistency and responsiveness to the Commission's recommendations.

This experience provided team members with new knowledge on the process of preparing for a site visit, applying Commission policies and procedures for site visits, appropriately utilizing team members' experience and expertise, and how team members can demonstrate objectivity and balance in professionally reviewing a university program. It also provided an opportunity to learn a great deal about the university being evaluated.

This was also an opportunity for other team members to learn how to work with members who are deaf, including techniques for effective interaction in meetings with an interpreter. We were also in a position to apply our unique expertise in reviewing a deafness-related program and have a meaningful dialogue with other team members about issues related to deafness. Likewise, we learned a great deal from the specialized expertise of other team members. For instance, a team member who directs a university library led discussions related to the library being reviewed. Other members of the team had

backgrounds in university administration, finance, and teaching, as well as other related areas such as special education.

### **Professionals Set Priorities for Actions on Standards**

At a 1992 regional conference sponsored by the Postsecondary Education Consortium, 100 professionals participated in a decision-making process to develop priorities to guide future directions in the postsecondary education of deaf youth (Schroedel & Ashmore, in press). These participants identified problems and recommended solutions in five topical areas: reducing attrition of deaf college students, improving services for hard of hearing students, enhancing postsecondary success of deaf minority students, increasing the marketability of work skills deaf students acquire during training, and developing standards to evaluate the quality of postsecondary support services. Five groups, comprising 20 to 25 participants each, were convened to address one of these five topical areas. Relevantly, the results of the PEC proceedings which focus only on program standards, will be reported here.

The group focusing on national standards considered much of the information reported above in this article while addressing related issues. These included identifying resources for developing standards, criteria to be included when drafting standards, and possible resources for implementing them. The 15 abbreviated statements in Table 1 summarize the main points emerging from this session. The four statements regarding resources reflect different strategies for articulating standards. The six statements on various criteria for standards mirror a diversity of professional opinions over what is meant by these standards.



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Table 1

Statements Developed by Focal Group On National Standards

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**Resources for Developing Standards**

1. Obtain input from deaf students and involve deaf professionals.
2. Have the AHEAD SIG on Deafness/Hard of Hearing in a lead role.
3. Utilize a network of resources and experts rather than a costly and formal task force.
4. Standards should be developed from new sources rather than from the 1973 CEASD guidelines.

**Criteria for Developing Standards**

5. Guidelines should be developed to measure educational outcomes of deaf students.
6. Use identified student needs and problems as criteria for developing program standards.
7. Collect descriptive data on deaf students who are either served or underserved.
8. Different guidelines for support services should be established for different types and sizes of programs.
9. Develop guidelines for delivery of specific support services and other special activities (remediation, life skills development, transition).
10. Develop statements of program activities to ensure equal access by deaf students into quality programs.

**Implementing Standards**

11. Request existing regional associations to help develop guidelines to evaluate special support services for deaf students and incorporate these in the accreditation process.
  12. Program coordinators should use all available resources (e.g., qualified interpreters) to ensure that guidelines are being met.
  13. Initiate the new standards on a trial or pilot basis.
  14. Develop a national reporting system, such a version of the guides for College and Career Programs, on the performance outcomes of each program for use by prospective deaf applicants.
  15. Ensure a degree of flexibility to allow programs to make improvements within their capacities without being in conflict with the guidelines.
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One important issue centered around formulating standards for special services for deaf as well as hard of hearing students attending any of the nation's colleges and universities in contrast to standards for special service programs for deaf students at the 150 identified institutions. The five statements on implementing standards indicate the different approaches which can be used singularly or in combination to initiate guidelines.

The key concept emerging from the working group on support service standards was "flexibility," including developing different guidelines (rather than standards) for different sized programs and producing guidelines more current than those prepared by the CEASD

(Stuckless, 1973). This group also saw the need to apply guidelines for special support services to the process of program accreditation through the assistance of regional accrediting associations. These needs are represented in Table 2 by the five top-ranked action statements determined by a process of voting for priorities within this group and ratified by 85 professionals attending a later plenary session to prioritize 25 action statements emerging from the five smaller groups. The five action statements on standards received relatively high priority votes, with the highest ranked statement being the perceived need to work with regional accreditation associations to develop standards applicable to special support services.

**Table 2**  
**Priorities for Future Actions on National Standards**  
**For Special Service Programs as Voted by Plenary Group**

	<u>Statement</u>	<u>Rating*</u>
1. Request existing regional accrediting associations to help develop guidelines to evaluate special support services for deaf students.	3.96	
2. Guidelines rather than standards should be developed to measure educational outcomes of deaf students.	3.33	
3. Guidelines should be flexible so that programs can provide reasonable accommodations while pursuing their program objectives without being in conflict with the guidelines.	3.32	
4. Different guidelines for support services should be established for different types and sizes of programs.	3.31	
5. These standards should be developed from new sources rather than from the 1973 CEASD guidelines.	3.11	

\* Based on rating each item (1) lowest to (5) highest priority.

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### Conclusions

In summary, the perspective has been presented that developing national standards for accrediting support service programs needs to take into account both special and general features of these programs and their host institutions. Special components are exemplified by program size (the number of deaf students on campus), aspects of accessibility (especially those for overcoming communication barriers), and support services which are unique to deaf students (i.e., interpreting, TDDs, and social activities). General components include the type of host institution with its key attributes such as administration, funding, and physical plant. Support services available to all students also represent general campus components (which need to be made accessible to deaf students). These circumstances justify the position that forming standards for specialized programs should occur with the context of standards for general aspects of postsecondary education. This linkage also strengthens the utility of these standards and their use in program evaluation and accreditation. In other words, over time accrediting special support service delivery systems should become as common place as academically accrediting host institutions. For all these reasons, specialists in postsecondary education with deaf students need to team with their peers in general high education to develop standards for special programs compatible to general standards for host institutions. Simultaneously, these standards must set criteria for excellence while being adaptable to the diversity in programs. The key word here is excellence in all aspects of programming, so that a low-quality services program cannot coincide on a campus high in academic quality.

However, as the results in Table 1 indicate, there remain wide differences in professional opinion as to which criteria should be used to develop national standards. Part of these

diverging opinions may reflect uncertainties over what is meant by standards and to what – student outcomes, services, or programs – they may be applied. This is a fundamental point needing continued communication to reach the consensus essential to maintaining the progress achieved in articulating program guidelines. In this respect, concentrating on the 150 postsecondary programs which offer support services for deaf students provides a helpful focal point in this direction. These programs serve more than 70% of the 10,000 early deafened students in college (Castle, 1990; Rawlings & King, 1986; Rawlings, et al., 1988). Much is known about these deaf students in contrast to the paucity of information about deaf and hard of hearing students attending regular institutions of higher education. This research, combined with the pragmatic know-how of postsecondary specialists, is the best available beginning point for developing program standards. This strategy also utilizes our strengths rather than our weaknesses in approaching this complex task.

Several significant benefits will result from these efforts. Once program accreditation is achieved, deaf students, their parents, and rehabilitation counselors will be better informed when selecting the most appropriate programs. Initiating a national system of program standards and accreditation has the potential to broaden access and enhance quality in services. This is a special challenge when future enrollments of deaf students are expected to be more racially, ethnically, culturally, and linguistically variegated than their predecessors (Nash, 1991). This forthcoming increase in the diversity of students will require that high-quality support services be in place and meet appropriate national standards. With these assurances of program quality established, postsecondary education will be better positioned to serve these future students. Furthermore, by articulating national standards for our programs, we are also setting guidelines to help develop our

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profession as postsecondary service providers to students who are deaf.

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