Memorandum to Presidents

Date: April 24, 1978

From: Office of the Chancellor

Subject: Self-Evaluation Requirement Under Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 states that "No qualified handicapped person may be excluded from federally assisted programs or activities because a recipient's facilities are inaccessible or unusable." It also states that "Recipients shall operate programs and activities so that, when viewed as a whole, they are readily accessible to handicapped persons."

It is the intention of the State University of New York to comply fully with Section 504 and to provide the opportunity for full participation in the University's programs and activities to people with disabilities. Several of our campuses are on their way to accomplishing this, and I urge all campuses to make program accessibility one of their priorities.

Clearly, this will require modification of some of our buildings and, occasionally, this may be extensive. However, program accessibility is the key element and you may find, for example, that relocating certain classes and services to accessible floors or buildings will enable you to be in compliance with Section 504. The law states that "... a recipient is not required to make structural changes in existing facilities where other methods are effective in achieving compliance."

There are two significant requirements of Section 504. The first is the Transition Plan, which calls for identification of specific barriers to program accessibility and the measures to be taken for removing those barriers. The date for accomplishing campus Transition Plans was December 3, 1977.

The second and major requirement of Section 504 is the Self-Evaluation process, which is to be accomplished by June 3, 1978. All policies and practices of a college or university are to be evaluated for their effects on persons with disabilities. Where called for, modifications must be made to eliminate discrimination on the basis of handicap. There must be participation by the handicapped, or organizations representing the handicapped, in the self-evaluation process.
Recognizing higher education's need for clarification and assistance, the National Association of College and University Business Officers (NACUBO) has recently published a Guide to the Section 504 Self-Evaluation for Colleges and Universities. NACUBO has distributed copies to all college and university presidents throughout the country, as well as to NACUBO campus representatives. In addition, our Office of Educational Services has just sent copies to the Campus Coordinators for the Handicapped. This comprehensive guide should be of considerable assistance to campuses by suggesting ways of organizing for the self-evaluation and identifying numerous questions and issues to be examined.

As stated in the NACUBO Guide, "... the Self-Evaluation, when completed, should constitute an institution's master plan for compliance with Section 504." I am asking all of you to continue your leadership, encouragement and support in complying with Section 504 generally, and to give your support in complying with the Self-Evaluation requirement specifically.

Our Central Office of Educational Services has University-wide coordinating responsibility for implementation of Section 504. If you or your colleagues have questions, please call Ev Pinneo in that office (518 - 473-4085).

cc: Coordinators for the Handicapped
    Task Force on the Handicapped

This memorandum addressed to:

    Presidents, State-operated Campuses

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    Presidents, Community Colleges
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    President Rose
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