

Higher Education Authority

Review of the Fund for Students with Disabilities

October 2017



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FOREWORD

This report is the outcome of an independent review of the Fund for Students with Disabilities (FSD) that was commissioned by the HEA. This review has taken place as part of the implementation of the National Plan for Equity of Access to Higher Education 2015-2019. The vision of this Plan is to ensure that the student body in higher education is representative of the wider population and the FSD is one of the core access measures supporting the realisation of this vision for people with disabilities.

The FSD was established by the Department of Education and Skills (DES) in 1994, on the recommendation of the Association of Higher Education Access and Disability (AHEAD) and the HEA. The FSD is co-funded by the European Social Fund and has been managed by the HEA, on behalf of the DES, since 2004. For over twenty years, the Fund has played an important role in helping further and higher education institutions to put in place the essential supports and services that are needed to enable full participation by students with disabilities.

The importance of the FSD is illustrated by the growth in the numbers supported - in the last academic year, the FSD supported over 10,000 students, as compared to just 300 in 1999. HEA data also indicates that 9% of students entering higher education last year were students with disabilities, compared to less than 1% in 1994. This is excellent progress. However, there continues to be many challenges and the review's recommendations seek to address these to ensure that the FSD continues to support increased numbers of students with disabilities successfully accessing and completing further and higher education.

The HEA, the DES, Solas, further and higher education institutions will be working together to progress the recommendations of the review. Actions will include the implementation of a new funding allocation model, the exploration of the potential to extend support to part-time students and the development of new guidelines and measures to support the sharing and mainstreaming of best practice in the use of the FSD consistent with universal design principals.

I would like to thank the consultants RSM (formerly PACEC) for conducting the review and would also like to thank the Steering Committee for overseeing the review, the students and staff from higher and further education institutions who participated in the consultation process and all other stakeholders who supported the review process.



Dr Graham Love

Chief Executive, Higher Education Authority

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Executive Summary



1 Executive Summary

1.1 Introduction

RSM UK, previously PACEC (Public and Corporate Economic Consultants) since 1995 are now trading as RSM UK since 2017, was appointed by the Higher Education Authority to undertake a review of the Fund for Students with Disabilities (FSD). The fund evaluates the role of FSD in supporting access and participation in higher education by students with disabilities, and whether the policies, guidelines and practices relating to the Fund are fit for current and future purpose.

1.2 Terms of Reference

The reference for this review were drawn up following a consultation process with stakeholders. In addition to fulfilling these terms of reference. The review considered four main areas: financial provision of the FSD; HEA model and guidelines; student experience of the fund; and educational institutions and the fund.

1.3 Recommendations

In light of the evidence gathered as part of this review, 14 recommendations have been proposed to develop and introduce a new model for allocating FSD funding by the HEA, reflecting on the scope for improvement identified as part of this review, ensuring buy-in from relevant stakeholders and building in a managed transition from current to new model. The recommendations address the following areas – reflecting the four main strands set out in the terms of reference for the review:

Strand 1: New Funding Model, Guidelines and, Scope of the Fund

Strand 2: Financial Provision of the Fund

Strand 3: Educational Institutions and the Fund

Strand 4: Student Experience of the Fund

1.3.1 Strand 1: HEA Model, Guidelines and Scope of Fund – New Funding Model

RECOMMENDATION 1

Establish an Implementation Group with a range of relevant and appropriate skills and experience to oversee the **design, development and implementation of a new model for allocating FSD funding**.

- Membership of the Implementation Group to include representatives of the Department of Education and Skills (DES), HEA, Disability Advisors Working Network (DAWN) (universities and IoTs), SOLAS, the Further Education (FE) Sector (including Education and Training Boards (ETBs)), Association for Higher Education Access and Disability (AHEAD), disability sector, students, teaching staff and learning support staff, etc. and a resource allocation expert.

1 EXECUTIVE SUMMARY (CONTINUED)

- The Implementation Group should agree with the sector the **key principles for allocating FSD funding to underpin a new model** including for example:
 - ▶ Transparency/Consistency/Simplified/Efficient and Effective/Needs Based (underpinned by needs assessment)
 - ▶ Maintain the individual nature of reasonable accommodations
 - ▶ Greater flexibility for Higher Education Institutions (HEIs) in how funding used to best support students
 - ▶ Greater ability to plan (early notification and greater certainty about level of funding)
 - ▶ A driver of service development, i.e. FSD should be progressive, supporting greater independence
 - ▶ Accountability (for HEA).
- The Implementation Group should consider the development of a funding model that takes account of the following:
 - ▶ HE sector: adopting a block grant allocation approach – ideally on a multi-annual funding basis – taking into consideration:
 - historical trends (e.g. numbers of students supported by FSD in the previous year or rolling average (by category of disability, by full-time (FT)/part-time (PT) (if support this));
 - weighting by student needs (low, high) and by year (higher for first year (given that most retention issues arise then when needs being identified/emerging));
 - ▶ FE sector: a separate allocation process though following similar principles as HE.
- The Implementation Group will oversee the **development of a plan to manage the transition from the current to new allocation model**. This should incorporate moderation to minimise any adverse impact (where institutions may receive lower levels of funding under the new model) and consider options to phase in the new approach.

RECOMMENDATION 2

The **timescales for allocating funding and processing payments** under FSD should be revised in the new model such that:

- The majority of funding is allocated earlier in the financial year and in advance of the beginning of the academic year – for example in June.
- A small proportion of the fund (e.g. circa 5%) is held back by the HEA as contingency to deal with exceptional circumstances that arise during the year. This funding would be accessible by individual application during the year.

- HEA would provide advance notification to institutions regarding their allocation thus assisting them in planning ahead; ideally linking this to notification of other access funding, i.e. access element of RGAM, SAF, etc. and on a calendar year basis.
- The payment profile would be linked to the academic year and receipt of claims. The majority would be paid out/drawn down as the academic year progresses though HEA would hold back a proportion (for example up to 20%) until the final claim is approved.

RECOMMENDATION 3

A greater level of accountability and assurance should be included in the new model for allocating funding under FSD such that:

- Regular random checks are carried out on site/within institutions by the HEA to provide quality control/audit function. These should examine in particular needs assessments and also how funding has been used to ensure this is consistent with the aims/objectives and criteria/guidelines of the FSD. A proforma/checklist of key issues would be developed in advance.
- A process is established to follow a representative sample of students who are supported through the FSD in order to establish what happened and in particular the difference made by the FSD. This would be focused on the impact of the fund rather than audit (process compliance). The data collection process (to capture key concise information on use of funding/support from FSD and difference made) should ideally be automated/on-line to minimise the resource required to carry this out.
- Data collection meets ESF requirements.

RECOMMENDATION 4

We recommend that all institutions in receipt of FSD funding be required to demonstrate a “whole institution” approach to supporting students with disabilities as a condition of receiving FSD funding (which should be focused on high needs students).

To demonstrate the institutions’ approach and to ensure that the FSD funding is targeted at those with the greatest need, this should include:

- Providing evidence to meet agreed **criteria to be eligible to receive FSD funding**:
 - ▶ **Minimum level of access infrastructure** (that should be funded by Access funding provided as part of recurrent funding rather than FSD).

1 EXECUTIVE SUMMARY (CONTINUED)

- ▶ **Disability Plan/Strategy¹** (whole college approach) including
- ▶ Approach to conducting **needs assessment** with individual students to ensure that the FSD focuses on those with high needs.
- **Accountability for how FSD funding is spent** within the institution including reporting. Each institution should submit an end of year reconciliation (signed off at a senior level for example by the Registrar) detailing:
 - ▶ How FSD funding spent.
 - ▶ Number of students supported through FSD by category of disability, by full/part-time status, etc.
 - ▶ Details of outcomes for those who are supported in particular progression to labour market or further study, retention, etc.

RECOMMENDATION 5

The Implementation Group should clearly set out the **how any potential underspend may be used** as part of their remit. Whilst there may be scope for HEIs to carry forward underspend, in advance of agreeing to this, the HEA would require the HEIs to demonstrate reasons for the underspend and detail how the underspend would be used for example to offset specific costs in the following year and/or to develop disability services in the next academic year (as part of the whole institution approach to supporting students with disabilities).

1.3.2 Strand 1: HEA Model, Guidelines and Scope of Fund – Improvements to HEA Guidelines for FSD

RECOMMENDATION 6

The Implementation Group should **ensure that guidelines for the new model for allocating FSD funding are amended** to reflect the changes arising from this review in relation to the changes in the model and eligibility/scope of the fund (including allocation, claims, supports that may be funded, etc.) and in relation to categories of students eligible for support and evidence requirements to support assessment of need.

¹ For example this could include:

- audit of current access infrastructure
- evidence of need for support – gaps in provision (access infrastructure)
- plans to develop disability services/infrastructure demonstrating that FSD focus will be on supporting high needs only thus encouraging institutions to develop access infrastructure (e.g. apply Universal Design for Learning (UDL) policies)
- How FSD complements existing access commitments such as developing inclusive teaching and learning processes, e.g. in organisation strategy, Compact, etc.
- Role of careers' service
- Monitoring including HEA strategic dialogue process and performance compacts with the institutions.

1.3.3 Strand 1: HEA Model, Guidelines and Scope of Fund – Scope for Harmonisation

RECOMMENDATION 7

The Implementation Group should explore the potential for introducing a **Disability Passport** that would record information on individual students' disabilities (and in particular to avoid re-assessment of conditions that do not change), needs assessments and accommodations at different stages of their educational journey to provide an informed basis for any needs assessment undertaken in FE/HE which should be based in the context of the environment that the student is working within.

1.3.4 Strand 1: HEA Model, Guidelines and Scope of Fund – Scope of the FSD

RECOMMENDATION 8

In the short term, the HEA should **continue to manage the element of FSD associated with the FE sector**, i.e. support students with disabilities in the FE sector; underpinned and supported by appropriate governance framework (SLA, action plan, etc.) given that the HEA does not have a formal relationship with the FE sector in any other area. In the longer term HEA and SOLAS should work together to transfer the administration of the element of the fund associated with the FE sector to SOLAS. This should provide support to the FE colleges and improve the experience of all those managing the fund.

RECOMMENDATION 9

We recommend that:

- the FSD should continue to provide support for Irish students who study in NI and other parts of the UK until the UK leaves the EU;
- arrangements for supporting **Irish students in NI and other parts of the UK** should be reviewed in advance of Brexit in order to define arrangements for supporting these students following Brexit;
- the FSD should continue to provide support for **Irish students who study in other EU countries**.

1 EXECUTIVE SUMMARY (CONTINUED)

RECOMMENDATION 10

The FSD should introduce support for **part-time students** in Irish FE and HE sector who are on credit bearing courses or leading to a full award (consistent with full-time students). This could be introduced on a pilot basis for HE part-time students initially.

1.3.5 Strand 2: Financial Provision of the Fund

RECOMMENDATION 11

We recommend that the **level of funding** allocated to the FSD is increased by at least €580K per annum to cater for the anticipated increase in numbers of students with disabilities and to ensure that the targets for increased participation in higher education by people with disabilities (set out in the National Access Plan) are met.

1.3.6 Strand 3: Educational Institutions and the Fund

RECOMMENDATION 12

Establish new fora and/or make use of **existing fora to share good practice and identify opportunities for further efficiencies** across institutions which benefit from FSD funding. (Efficiencies might include, for example: scope for centralising some procurement of services, etc.).

In the HE sector, existing fora might provide a vehicle for this – for example: DAWN, AHEAD, Teaching and Learning Forum (though the latter has a broader remit and is not solely concerned with disability).

In the FE Sector, there is a need to develop fora and access to support/sharing of good practice.

1.3.7 Strand 4: Student Experience of the Fund

RECOMMENDATION 13

There is scope to improve processes in relation to the FSD and in particular those relating to communication and sharing of information – for example:

- **Communication and awareness raising** (for wider FE/HE community: staff and students)
 - ▶ Increased communication between disability support services and lecturers/teaching staff;
 - ▶ Awareness training for lecturers/teaching staff so better equipped to support students with a disability from outset;
- **Peer support amongst students with disabilities:** More opportunities for peer support/group interactions for students to discuss how they manage their disability/what supports they have as well as social support;
- **Expanding services**, e.g.: learning support outside of class time/college hours;
- **Mainstreaming of services** for disabled students. Fora to share good practice.

RECOMMENDATION 14

In order to maximise the impact of the FSD, it is important that promotion of disability services and support to transition link in with those who will benefit from the service to raise awareness of supports available and encourage potential students to consider their needs in advance, and also consider how best they support those who are currently benefitting to progress to the next stage in their career as follows:

- **Promoting disability services** – orientation for students in FE/HE and promote support available to pupils at secondary schools; positive aspirations.
- **Increase support to transition** to further study and labour market including transition year, career guidance, work related skills and experience, etc. These recommendations relate to the wider role of Disability Services and would not be funded through the FSD, but more likely through core grant funding.

Introduction and Background to the Review



2 Introduction and Background to the Review

2.1 Introduction

PACEC was appointed by the Higher Education Authority to undertake a review of the Fund for Students with Disabilities (FSD) or “the Fund” to evaluate its role in supporting access and participation in higher education by students with disabilities, and to ascertain whether the policies, guidelines and practices relating to the Fund are fit for current and future purpose.

2.2 Terms of Reference

The reference for this review were drawn up following a consultation process with stakeholders. The review considered four main areas: Financial provision of the FSD; HEA model and guidelines; student experience of the fund; and educational institutions and the fund.

2.3 Methodology

The main work streams in the delivery of this assignment included:

- Desk-based research: policy context and review of Fund data;
- Consultation:
 - ▶ One to one/telephone and email consultation with 19 stakeholders (Appendix L – Part 3)
 - ▶ Site visits to five Further Education Institutions (FEIs) and HEIs (Appendix P – Part 3)
 - ▶ Survey of FEI and HEI staff (50 responses – Appendix Q – Part 3)
 - ▶ Survey of FEI and HEI students (890 responses – Appendix O – Part 3)
 - ▶ Focus Groups with FEI and HE students (4 groups, 21 participants – Appendix N – Part 3)
 - ▶ Stakeholder consultation one-day event (61 participants) to test emerging findings and seek feedback on these.
- Best Practice Benchmarking: a review of best practices in access and support for disabled students in the UK, USA and Australia; and
- Analysis and reporting.

The work was assisted by a Steering Committee chaired by the HEA. Membership of the Steering Committee is listed at Appendix S – Part 1.

2 INTRODUCTION AND BACKGROUND TO THE REVIEW (CONTINUED)

2.4 Format of the Report

The remainder of this report is structured as follows:

- Chapter 3 – Context for the Review;
- Chapter 4 – Fund for Students with Disabilities – Overview;
- Chapter 5 – Consultation Feedback;
- Chapter 6 – Benchmarking – Interventions to Support Students with Disabilities in Other Jurisdictions;
- Chapter 7 – Benchmarking – Interventions to Support Students with Disabilities in Ireland; and
- Chapter 8 – Conclusions and Recommendations.

Separate information is included in Appendices (Separate documents which can be accessed online at www.heai.ie).



Context for the Review

3



3 Context for the Review

3.1 National Access Plan and Targets for increased participation: 2015-2019

3.1.1 National Access Plan – Vision

The Review of the Fund for Students with Disabilities is an action that has arisen from the National Plan for Equity of Access to Higher Education 2015-2019 (i.e. The National Access Plan). The National Access Plan has the vision of ensuring that the student body entering, participating in and completing higher education at all levels reflects the diversity and social mix of Ireland's population. One of the five goals under the Plan to achieve this is '*to assess the impact of current initiatives to support equity of access in HEIs*' and Objective 2.3 under this goal is '*To review the Fund for Students with Disabilities (FSD)*'.

Under the National Access Plan the HEA (and DES) are '*committed to increasing participation in higher education by groups who have been under-represented*' and one of the groups identified in the Plan as being under-represented is Students with disabilities. While the HEA and the DES are committed to continuing to support students with any category of disability and to ensuring that all students with disabilities can access and participate in higher education on an equal basis, the Plan identifies and focusses on three under-represented groups in the disability community and sets specific targets for entry by those in the each of these groups as well as an overall target for people with disabilities. The particular groups targeted are:

- Entrants from socio-economic groups that have low participation in higher education.
- First time, mature student entrants.
- Students with disabilities.
- Part-time/flexible learners.
- Further education award holders.
- Irish Travellers.

These target groups cover a range of 'under-represented groups', not just students with disabilities.

3.2 Internal Review of FSD (2012)

An internal review² of the FSD carried out in 2012 identified a number of areas for development:

- Lack of opportunity for systematic feedback from students;
- Lack of comprehensive information on outcomes for students supported by the Fund;
- Disparity in the reach and extent of disability support services;
- Demand for a 'level playing field' for people with disabilities wishing or needing to participate in education on a part-time basis;

2

HEA (2012) Review of the Fund for Students with Disabilities in further and higher education (Ireland).

3 CONTEXT FOR THE REVIEW (CONTINUED)

- Delays in approval of applications for support from students in further education and training;
- Need for equal access to psycho-educational assessments for students with specific learning difficulties; and
- Continued difficulties with management of European Social Fund reporting and audit requirements.

The issues raised by this internal report provided a basis for an external review of the Fund.

3.3 Consultation Process preceding this Review of FSD

The terms of reference for the review were drawn up following a consultation process with stakeholders and during which key points were made in relation to financial provision, the HEA model, student experience of the fund and how it is managed by each institution. Many of the points raised have informed the terms of reference and the review.

3.4 Legal Obligations with Respect to Provision of Education to Students with Disabilities

The Education Act 1998 (Government of Ireland, 1998, Part 1, Interpretation: 2. (1)) sets out a definition of disability which has been retained throughout subsequent legislation in Ireland (Disability Act 2005; Equal Status Acts 2000-2012). The Disability Act 2005 sets out a number of statutory obligations for public bodies in relation to access to public buildings, services and information, and employment of people with disabilities, and stipulates the requirement for individual assessment of need.

The Equal Status Acts 2000-2012 in Ireland (Government of Ireland) give protection against discrimination by educational institutions. For the purposes of the Equal Status Acts, Higher Education Institutions are service providers and are prohibited from discriminating against any person seeking to access a course³, benefit or facility on the grounds of disability or any of the eight other discriminatory grounds.

Under the principle of vicarious liability, the institution has legal responsibility for the conduct, in the course of their employment, of individual teachers, lecturers and other staff members. The institution is also vicariously liable for discrimination by agents acting on their behalf

Section 4 prescribes that for the purposes of the Act, discrimination includes a refusal or failure by the provider of a service to do all that is reasonable to accommodate the needs of a person with a disability by providing special treatment or facilities, if without such special treatment or facilities it would be impossible or unduly difficult for the person to avail himself or herself of the service.

³ Any course provided by the Institution, whether full-time or part-time.

A refusal or failure to provide the special treatment or facilities is not deemed to be reasonable unless doing so would incur more than a nominal cost to the service provider. The meaning of nominal cost is relative to the size of the institution and the available resources of the institution or organisation.

The HEA (2014) provide examples of minimal cost reasonable accommodations (RAs) that can be implemented within HEIs and which represent models of good practice in addressing exclusionary practices such as:

- disability awareness training for administrative and academic staff to encourage teaching pedagogy that is inclusive, such as the use of multi-media, provision of electronic notes, podcasting lecture material;
- integration of assistive technology into learning management systems and online applications;
- employing strategies for service delivery that enhance rather than hinder development of independent learning and, where possible, the general independence of the student.

Specific modifications or adjustments within an academic programme place the onus of responsibility on the individual not only to disclose, but to demonstrate how, why and in what way they may be restricted or excluded from participating on an equal footing. This is established through the Needs Assessment (NA) process which is conducted on behalf of the HEI by a disability officer.

The reasonable accommodation duty is only triggered where there is actual or constructive knowledge of the service user's disability. Where a service user chooses not to comply with a request for medical evidence/certification of the disability, this may relieve the service provider from their duty to reasonably accommodate.

The initial decision around disclosure rests with the individual. Where a student discloses to the college, they should be advised per the provisions of the Data Protection Act 2003, as to any relevant third party dissemination and should be requested to expressly consent or dissent to same in writing.

In summary, the Fund is underpinned by a comprehensive national framework of policies and legislation throughout the education system, designed to ensure equality of participation in education for people with disabilities. The Fund is part of Europe-wide efforts to combat the risk of exclusion and enhance labour market participation by members of the disabled community. This linkage within a wider European framework is reflected in the contribution of the European Social Fund, since 2000, to financing of the Operational Programme of which the FSD is a component.

Fund for Students with Disabilities – Overview



4 Fund for Students with Disabilities – Overview

4.1 Purpose of Fund for Students with Disabilities

The purpose of the Fund for Students with Disabilities (FSD) is to ensure students with disabilities have the necessary assistance and equipment to enable them to access, fully participate in and successfully complete their chosen course of study⁴ It is one of the main funding sources supporting participation by students with disabilities in approved further and higher education courses in Ireland. It also supports students from Ireland to study on approved courses in Northern Ireland, the UK and other EU countries.

The objectives of the FSD (for Irish HEIs) are:

- To provide a block grant to HEIs to:
 - (a) fund supports for students with high needs (i.e. Personal Assistants (PAs), Irish Sign Language (ISL) , ISL/SpeedText and Transport, as per Further Education funding model).
 - (b) to provide enough funding to support all eligible non-high needs students with support on an individualised or shared group basis.
 - (c) To align institutional grant allocations with actual financial requirements.

The objectives (for Irish FEIs) is:

- to prioritise funding for “high needs” supports while providing enough funding for colleges to provide additional support for “high incidence/low needs” students.

The Fund is managed by the Higher Education Authority on behalf of the Department of Education and Skills. It is co-financed by the European Social Fund (ESF) through the Programme for Employability, Inclusion and Learning 2014-2020 (PEIL), providing 50% co-financing through the Third Level Access initiative under the thematic Priority 3.

The FSD has been in place since 2004 and allocates funding to FE and HE institutions. The FSD is disbursed on the basis of applications made by higher and further education institutions on behalf of their students.

4.2 Scale of Funding and Number of Students Supported

Since 2008 almost €70m has been disbursed from the FSD, supporting over 38,000 students⁵. The number of students supported by the fund each year has increased from 3,500 to over 10,000 since 2008. It currently supports over 10,000 students each year with a budget of around €10m per annum. In 2015/16 there were 10,486 beneficiaries; of these 421 were postgraduate students.

4 Source: Review of the Fund for Students with Disabilities – Invitation to Tender (HEA, 2015).

5 Source: Access Funding – Fund for Students with Disabilities (HEA Website, accessed 27th April 2016, <http://www.heai.ie/en/policy/national-access-office/access-funding>).

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

In this section analysis is based on the most recent data available at the time of writing (in some cases 2014/15, and in others 2015/16).

4.2.1 Funding Allocated and Number of Beneficiaries

Table 4:1: FSD: number of beneficiaries and total funding allocated (2012/13–2015/16)

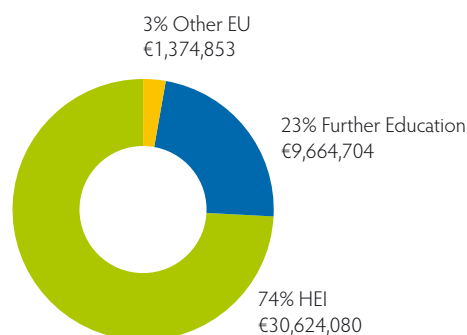
Year	Number of Beneficiaries	Total Funding Allocated
2015/16	10,486	€10,369,000
2014/15	10,050	€10,316,000
2013/14	8,809	€10,306,000
2012/13	7,897	€10,589,000

Source: FSD Data – Numbers of Students by Disability Category (Received from HEA)

The data analysed in this section refers to funding which is the grant as allocated by the HEA – the maximum allowable expenditure for the academic year.

During the period 2012/13 to 2015/16 (to March 2016) the majority of FSD funding was provided to Higher Education Institutions (€30,624,080, representing 73.5% of the total funding allocation). Overall, funding was allocated as illustrated below:

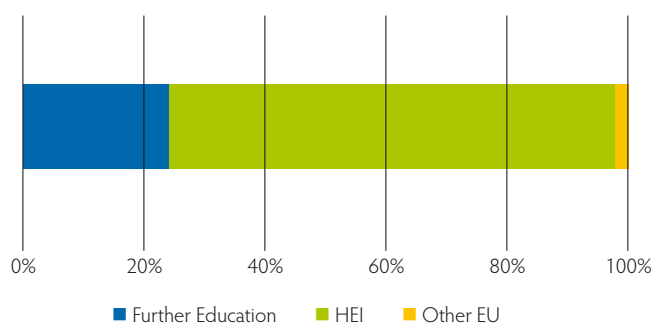
Figure 4:1 Funding allocated during the period 2012/13 to 2015/16 (to March 2016)



Source: FSD Funding Allocated – 2012/13 to 2015/16 (to March 2016)

Considering the most recent year for which data has been provided (2015/16 (to March)) the percentage of funding allocated is as illustrated below.

Figure 4:2 Funding allocated for 2015/16 (to March 2016)



Source: FSD Funding Allocated – 2012/13 to 2015/16 (to March 2016)

Each year a large proportion of funding has been allocated to a small number of institutions; those institutions allocated most funding across the period under consideration (2012/13 – 2015/16) are:

- HEIs: the majority of funding (€10.2m/c.34% of the total funding allocated to HEIs over four years) was allocated to four institutions. Most was allocated to two Institutes of Technology and two universities with the former receiving slightly more than the latter.
- FEIs: the majority of the funding (€6.6m/68% of the total funding allocated to FEIs over four years) was allocated to four ETB's.
- EU Institutions: the majority of the funding (€412,895/30% of the total funding allocated to EU institutions over four years) was allocated to four UK institutions.

Demand for the fund has grown rapidly in recent years as from 2012/13 to 2014/15 the number of students being supported through the Fund has grown from 7,897 to 10,050 beneficiaries⁶, representing a growth of 27.3%. Prior to this, the total number of students supported by the FSD, had increased from around 3,500 to over 10,000 between 2008 and 2014.

However over the same period, the level of funding has reduced slightly from €10.5m to €10.3m. Therefore while the number of beneficiaries has increased substantially, the level of funding has remained more or less static.

Further detail on FSD funding is contained in Appendix C – Part 1.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

4.2.2 Number of Students (Beneficiaries) Supported

All Beneficiaries – By Institution Type

For the 2014/15 academic year⁷:

- 84.8% (n=8,524) of beneficiaries were enrolled in HEIs;
- 13.4% (n=1,350) of beneficiaries were enrolled in FEIs; and
- 1.8% (n=176) of beneficiaries were enrolled in UK institutions.

The profile of beneficiaries broadly reflects the profile of funding allocated to each type of institution discussed in the previous section.

Beneficiaries by Year of Study and Institution – Irish Institutions

- **FEI Beneficiaries:** In total there were 1,357 beneficiaries from FEIs in 2015/16. The majority of beneficiaries (70.8%) were on one year courses, followed by those in their first year of a two year course and those in the final year of a two year course (18.7% and 10.5% respectively). The ETBs areas with the highest number of student beneficiaries (accounting for 48%) for 2015/16 were;
 - ▶ City of Dublin (n=242)
 - ▶ City of Cork and County Cork (n=240)
 - ▶ County Dublin and Dun Laoghaire (n=168).
- **Undergraduate Beneficiaries at HEIs:** In total there were 8,486 undergraduate beneficiaries in 2015/16. Most beneficiaries (45%) were in 'Other' years of study (i.e. not first or final year) followed by just over a third of undergraduate beneficiaries in the first year of their studies and just over a fifth being in their final year. The HEIs with the highest number of undergraduate student beneficiaries (accounting for 38% of all) for 2015/16 were:
 - ▶ Dublin Institute of Technology (n=864);
 - ▶ University College Dublin (n=809);
 - ▶ Trinity College Dublin (n=806); and
 - ▶ University College Cork (n=745).
- **Postgraduate Beneficiaries at HEIs:** Overall there were 421 FSD beneficiaries on postgraduate courses at 22 HEIs in 2015/16 benefitting from FSD, with the largest number of these coming from University College Dublin (n=75, 17.8%) followed by University College Cork (n=68, 16.2%) and Trinity College Dublin (n=65, 15.4%).

7

FSD Data – Numbers of Students by Disability Category (Received from HEA).

All Beneficiaries – Category of Disability

The most common category of disability of the beneficiaries of the Fund was specific learning disabilities (SLD) which accounted for 50.7%/5,097 beneficiaries in 2014/15, followed by multi-disability⁸ (n=1,049, 10.4%) of beneficiaries.

The table below set out the numbers of students approved by category of disability for 2012/13 to 2014/15.

Table 4:2 Number of Students Approved by Category of Disability, 2012-2015

Disability Category	2012-13		2013-14		2014-2015	
	N	%	N	%	N	%
ADD/ADHD	202	2.6%	258	2.9%	305	3.0%
Autistic Spectrum Disorder	281	3.6%	332	3.8%	435	4.3%
Blind/Visual Impairment	157	2.0%	180	2.0%	185	1.8%
Deaf/Hard of Hearing	258	3.3%	243	2.8%	262	2.6%
Mental Health	573	7.3%	687	7.8%	884	8.8%
Multi-Disability	604	7.6%	953	10.8%	1,049	10.4%
Other	293	3.7%	387	4.4%	489	4.9%
Physical Disability/ Mobility Impairment	438	5.5%	458	5.2%	509	5.1%
Significant Ongoing Illness	612	7.7%	705	8.0%	835	8.3%
Specific Learning Difficulties	4,479	56.7%	4,606	52.3%	5,097	50.7%
Total	7,897	100%	8,809	100%	10,050	100%

Source: FSD Data – Numbers of Students by Disability Category (Received from HEA)

While there has been a year on year increase in the number of students with SLD, there has been a decrease in the proportion of overall students with SLD being supported under the FSD suggesting that a more diverse range of disabilities are being funded in more recent years. Furthermore, those with SLD remained the most common category across the three years with over half of those supported having a disability under this category. Other notable increases include those in the multi-disability category with an overall increase of 445 students (2.8%) and those with mental health disabilities showing a 1.5% increase of 311 students.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

The disability category with the lowest numbers of supported students is the blind/visual impairment category, however this has shown modest year on year growth in the numbers of students supported from 157 in 2012/13 to 185 in 2014/15. This was closely followed by those that are deaf/hard of hearing; this was the only category of disability to experience a decrease in the numbers supported between years with a decrease from 258 students to 243 (5.4% drop) between 2012/13 and 2013/14, however in 2014/15 this number rose beyond that of the 2012/13 figure to 262 students.

Further detail on the number of students accessing the fund is contained in Appendices A and B – Part 1.

4.2.3 Allocation of Funding and Number of Beneficiaries – By Institution Type

The table below sets out the number of FSD recipients and the allocation of FSD funds by type across Irish Institutions for the year 2015/16.

Table 4:3 Number of students assisted and allocation of funds under FSD by sector, 2015/16

	FSD Beneficiaries		Allocation to Irish Institutions		Funding per capita
	N	%	€	%	€
University	4,678	46.0%	€3,182,720	31.8%	€680
Institute of Technology	3,736	36.8%	€3,924,456	39.3%	€1,050
Other College (General and Specific Courses) ⁹	393	3.9%	€486,730	4.9%	€1,238
Further Education College	1,357	13.4%	€2,400,272	24.0%	€1,769
Total	10,164	100.0%	€9,994,178	100.0%	€983

Source: FSD Data – Numbers of Students by College and Year of Study and FSD Data – Funding Allocated

The table shows that:

- The overall allocation of funding (almost €10m) supports over 10,000 students which equates to €983 per beneficiary.
- Almost one third of FSD funding is allocated to universities (31.8%) to support almost half of all FSD beneficiaries (46%). This equates to the lowest allocation per capita across all sectors at €680 per head.

- Institutes of Technology support the second largest number of students (36.8%) and receive the largest allocation of funding (39.3%). This translates to an allocation per capita of €1,050, the second lowest allocation, though around one and half times that in universities.
- Other colleges have the lowest number of recipients (3.9%) and the smallest allocation of funding (4.9%), which translates to an allocation per student of €1,238, the second highest allocation per capita across sector types.
- Further education colleges support the second lowest number of students (13.4%) and receive the second lowest allocation (24.0%). However this translates to the largest allocation per capita across all sectors at €1,769.

To further explore this relationship the table below sets out the percentage change in the number of recipients of FSD and the percentage change in funding allocated between the years 2012/13 and 2014/15.

Table 4:4 Percentage change from 2012/13 to 2014/15 in the number of students assisted and total funding allocation across sectors

	Percentage change in FSD Recipients	Percentage change in allocation
Irish Higher Education	+26.2%	-5.0%
Irish Further Education	+41.2%	-0.7%
UK Institutions	-5.4%	-0.9%
Total Change	+27.3%	-1.7%

Source: FSD Data – Numbers of Students by Disability Category and FSD Data – Funding Allocated

The table shows that overall from 2012/13 to 2014/15 there has been a 27.3% increase in the number of students supported by FSD with a corresponding overall decrease of 1.7% in funding allocation.

At the sector level:

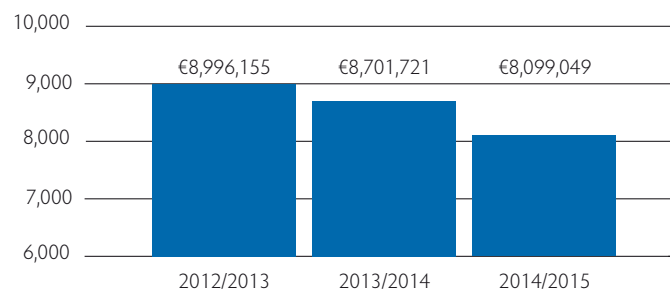
- Irish HEIs have seen the largest percentage decrease in allocations of 5%, against a substantial increase (26.2%) in recipients.
- Irish FEIs have seen the largest percentage increase in the number of FSD recipients (41.2%), in parallel with a decrease in allocation of 0.7%, the lowest decrease in allocations.
- UK institutions have seen relatively little change and is the only sector to show a reduction in the number of students supported (5.4%), along with a 0.9% reduction in funding allocated.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

4.2.4 Expenditure

Expenditure is as reported by each institution; this is reported on a quarterly basis from October to September each year. This represents spend actually incurred by, as distinct from the funding allocated to, each institution. Across the period 2012/13 to 2014/15 there was a total expenditure of €25,796,924.

Table 4:5 Overall expenditure by year 2012/13 to 2014/15



Source: FSD Expenditure 2012 to 2014 (Excel sheet)

There has been a year on year decrease in the total expenditure amount from 2012/13 to 2014/15, with the 2012/13 expenditure figure of just under €9m dropping by 10.0% to give the 2014/15 expenditure amount of just under €8.1m.

The main reasons for the reduction in expenditure are as follows:

- Delay in confirmation of final allocation – Given some uncertainty as to the level of funding awarded, colleges may be reluctant to implement supports for some students (at least at the level implemented in previous years) until they have confirmation of their final allocation.
- Costs of assistive technology (AT) have declined. A lot of newer technologies are built with the needs of people with disabilities in mind, e.g. built-in voice activation and text-to-speech etc. In addition, there may be a trend away from individualised implementation of AT supports to mainstreaming supports via site-licences etc.

There are two main categories of expenditure, each with sub-categories under which expenditure has been incurred as shown below.

Table 4:6 Types of FSD expenditure

Services	Assistive Technology
<ul style="list-style-type: none"> ■ Alternative Format ■ Targeted Transport ■ ISL/Speedtext ■ Note Takers (Including electronic notetaking) ■ Personal Assistants ■ Photocopying ■ Study Skills/Learning Support ■ Targeted Transport ■ Tuition – Subject Specific Tuition ■ Other Services 	<ul style="list-style-type: none"> ■ Laptop/Desktop/Tablet Computers ■ Assistive Technology Software ■ Assistive Technology – Other

The majority of expenditure has come under the category of Services (88.6% of overall expenditure), followed by assistive technology (11.0% of overall expenditure). Within the category of Services, the two sub-categories which account for the largest expenditure are:

- Study Skills/Learning Support – This accounted for the largest proportion of expenditure each year under the Fund with 22.0% (€5.7m) of overall expenditure across the three academic years; and
- Personal Assistants – This accounted for the second largest proportion of expenditure each year under the Fund with 18.1% (€4.7m) of the overall expenditure across the three academic years.

Expenditure under the different categories has remained steady over the years 2012/13 to 2014/15 with the largest proportional change being a five percentage point drop in expenditure on ISL/Speedtext between 2012/13 and 2014/15.

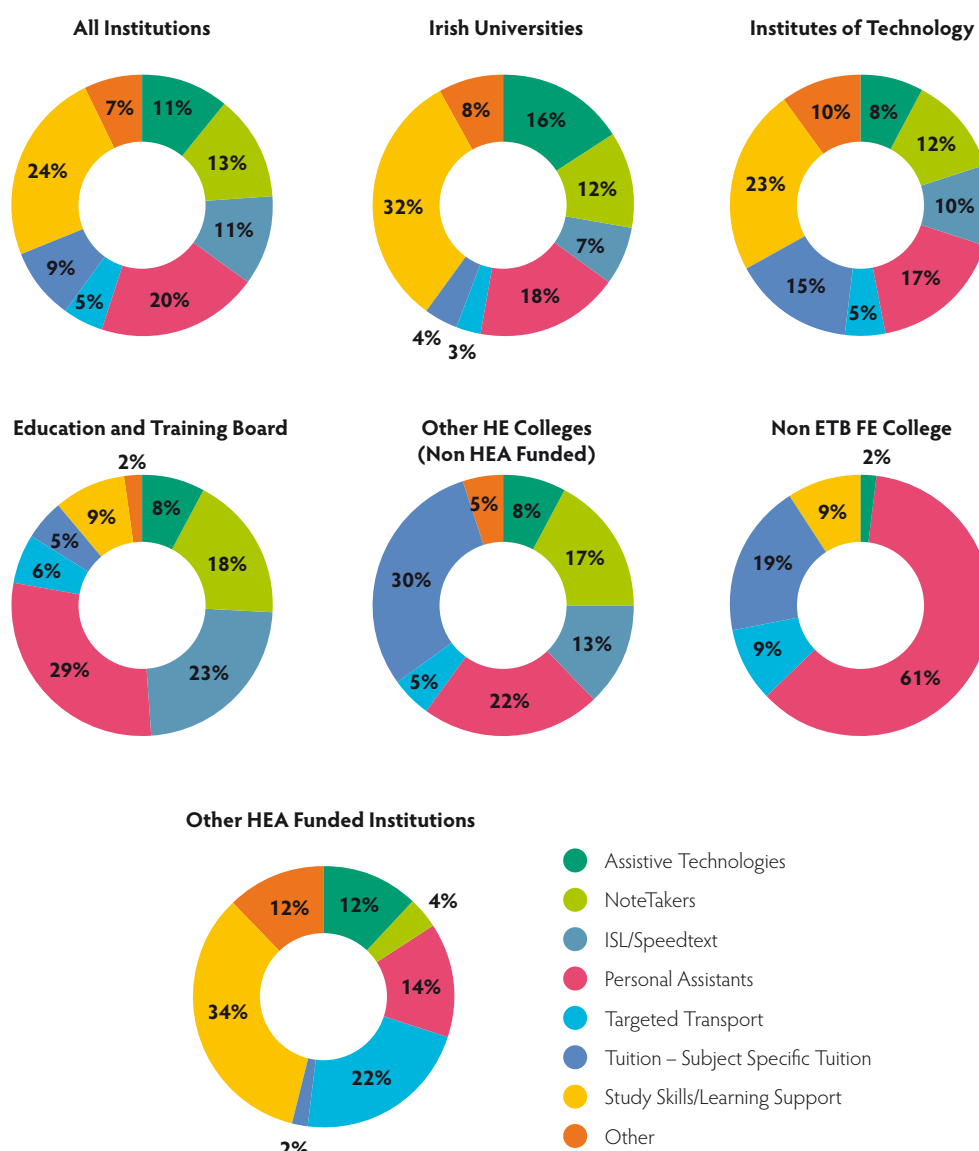
The seven pie charts in the figure below show the proportion of expenditure under each category overall and at the six different institution types; certain expenditure categories have been combined to allow for this analysis (See Appendix D – Part 1 for full details) and as such the expenditure has been categorised as follows;

- Assistive Technologies – Including Laptop/Desktop/Tablet Computers; Software; and Other
- Services – Notetakers
- Services – ISL/Speedtext
- Services – Personal Assistants
- Services – Targeted Transport

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

- Services – Tuition – Subject Specific Tuition
- Services – Study skills/learning support
- Other – Including Services (Alternative Formats; Needs Assessments; Photocopying; Other Services); and Other (where limited information on expenditure is provided: Q4 Estimate and Total Only (No Breakdown)).

Table 4:7 Expenditure under the fund by type of institution, 2014/15



Source: FSD Expenditure 2012 to 2014 (Excel sheet)

Further detail on expenditure is contained in Appendix D – Part 1.

4.2.5 Payments

Payments refer to the amounts paid by the HEA in respect of the academic year. Across the period 2012/13 to 2015/16 (i.e. to March 2016) payments totalling €31,421,486 have been made by the HEA to institutions under the FSD, of this 37.6% was allocated to Institutes of Technology and 29.3% to universities.

Further detail on payments is contained in Appendix E – Part 1.

4.3 HEA – Implementation of FSD – Guidelines

4.3.1 FSD Guidelines

There are four broad categories of student which FSD supports according to type and location of institution seeking support from the FSD. The approach to supporting each of these is described more fully in four separate sets of guidelines:

- HEIs¹⁰
- FEIs/ETBs¹¹ in Ireland;
- Northern Ireland (NI) institutions¹²; and
- European Union (EU) institutions¹³.

These guidelines share many similarities though there are some differences as discussed below (further detail is provided in Appendix G - Part 2). The allocation process is the same for NI and “other EU” (mostly other UK). Two different sets of guidelines exist as postgraduate students in Northern Ireland are eligible whereas they are not eligible in the rest of the EU.

4.3.2 Purpose of FSD funding

All four sets of guidelines stipulate that the purpose of the FSD is to “provide resources to colleges of further and higher education for the delivery of key services, reasonable accommodations and supports for learners with disabilities on full-time courses. The Fund aims to support the personal, educational and professional development of the participating learner and contribute to the achievement of their full potential.”

10 Higher Education Authority: Fund for Students with Disabilities Guidelines for Higher Education Institutions for academic year 2015-16 – full-time approved higher education courses leading to a major award (undergraduate and postgraduate).

11 Guidelines for Further Education Colleges for Academic year 2015-16 – full-time approved further education courses in Ireland.

12 Guidelines for institutions in Northern Ireland 2015-16 – full-time under- and postgraduate courses in NI.

13 Guidelines for institutions in EU countries other than Ireland 2015-16 – full-time undergraduate courses in EU states other than Ireland.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

4.3.3 Eligibility for FSD

The types of disability eligible for support, the evidence required and other eligibility criteria (nationality and course type) are similar for each type of guidance; a summary of these is provided below.

- **Category of disability eligible for support through the FSD.** This is the same across institutions in Ireland, NI and the EU who are provided with support for the same categories of disabilities, specifically the following:
 - ▶ Autistic Spectrum Disorder (including Asperger Syndrome);
 - ▶ Attention Deficit Disorder/Attention Deficit Hyperactivity Disorder;
 - ▶ Blind/Vision Impaired;
 - ▶ Deaf/Hard of Hearing;
 - ▶ Mental Health Conditions;
 - ▶ Neurological Condition (including Brain Injury, Epilepsy, Speech and Language Disabilities);
 - ▶ Significant Ongoing Illness;
 - ▶ Physical/Mobility;
 - ▶ Developmental Co-ordination Disorder (Dyspraxia/Dysgraphia); and
 - ▶ Specific Learning Difficulties (SpLD) (Dyslexia or Dyscalculia).
- The general learning disabilities (GLD) cohort is not included – according to the recent AHEAD/DAWN report on reasonable accommodations¹⁴ this is felt to be “*perhaps because there is an expectation that such students would be unlikely to satisfy the entry requirements in terms of points or other academic achievement for access to HE. However, this does not acknowledge the possibility that students with Mild or Borderline GLD may progress to HE via the Mature Student route, for which Leaving Certificate qualifications are not required.*” However students with general learning disabilities in FEIs are eligible for support.¹⁵

14 AHEAD, DAWN (2016) A Review of Reasonable Accommodations for Students with Disabilities in Higher Education in Ireland.

15 FSD disability categories were modelled on the DARE criteria which did not make any reference to General Learning Difficulties or Intellectual Difficulties. The HEA added the GLD category to the FE guidelines in recognition of the types of disabilities which are more prevalent in FE.

- **Evidence** – refers to the documentation that is required to be provided in order for FSD support to be provided. All institutions are required to provide evidence of verifiable disability and while different forms of evidence are required for different categories of disability¹⁶, this is consistent across all institutions
- **Nationality** – national eligibility criteria refers to legal requirement to, e.g. have been resident in Ireland for a specific number of years before course commencement. All institutions have the same eligibility criteria regarding nationality.¹⁷
- **Course Duration** – refers to how long the course is required to last in order for the student to receive support from the FSD. The duration of eligible courses varies as HEIs and FEIs courses are required to be of no less than one year's duration whilst this increases to two years for NI and EU institutions.
- **Approved courses:** Eligible students can receive assistance from post leaving certificate (PLC) to doctoral level during any year of study, on an approved course. Students registered to full-time undergraduate courses in a publicly-funded institution within the EU are eligible to apply for FSD, students attending postgraduate courses outside the Republic of Ireland and Northern Ireland are not supported. Those supported are:
 - ▶ Full-time approved higher education courses leading to a major award (undergraduate and postgraduate)
 - ▶ Full-time approved further education courses in Ireland
 - ▶ Full-time under- and postgraduate courses in Northern Ireland
 - ▶ Full-time undergraduate courses in EU states other than Ireland

Students with disabilities enrolled in part-time courses, access or foundation courses in HEIs or short courses, are not eligible for consideration.

¹⁶ For example, autistic spectrum disorder (including Asperger Syndrome) requires an appropriately qualified consultant psychiatrist OR psychologist OR neurologist OR paediatrician who is a member of his or her professional or regulatory body to provide a diagnosis of autism or Asperger Syndrome; while a mental health condition requires a report from the consultant psychiatrist or specialist registrar that should be no older than five years from the date of needs assessment.

¹⁷ A student must be legally resident in Ireland for at least three of the five years up to the day before her/his approved course commences in an approved institution. To qualify the student must be either: an Irish national, a national of another EU member state, the European Economic Area (EEA) or Switzerland.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

4.3.4 Support Available

The type of support available and eligible and ineligible expenditure is as follows:

- **Type of services/accommodations provided:** the same services and accommodations are referred to in all four guidelines:
 - ▶ Assistive Technology Equipment and Software;
 - ▶ Personal Assistance;
 - ▶ Note-takers;
 - ▶ Irish Sign Language Interpreters;
 - ▶ Speedtext;
 - ▶ Subject-specific tutorials;
 - ▶ Study Skills Support; and
 - ▶ Travel Costs/Transport.
- **Eligible expenditure:** funding can be used to provide supports and accommodations in any of the following four categories:
 - ▶ Assistive Technology Equipment and Software;
 - ▶ Personal Assistance;
 - ▶ Academic/Learning Support; and
 - ▶ Transport.
- **Ineligible expenditure:** the Fund does not cover expenditure on any of the following:
 - ▶ assessment or diagnosis of a disability;
 - ▶ any medical equipment, assistance or support;
 - ▶ services that can reasonably be expected to be provided by the college (e.g. counselling service) or by another agency (e.g. local health service);
 - ▶ course-related equipment, books, materials or software (i.e. applicable to all students on the course);
 - ▶ support or assistance provided outside the academic year, or periods during the academic year when the college is closed;
 - ▶ Subsistence, mileage and accommodation costs for personal assistants, note-takers, speed-text operators or ISL interpreters; and
 - ▶ staff training and development policy work or research.

These are the broadly same for HEI and FEI students in Ireland as well as those in NI and the EU. The only exceptions are the following which are not eligible for support in HEI, NI and EU institutions:

- repairs, technical support, insurance or warranty costs arising from equipment purchased for students approved for support under the Fund; and
- policy work or research.

4.3.5 Processes and Timescales for Accessing Funding

The majority of funding (and students supported) are based in HEIs in Ireland (which account for approximately 73-74% of the funding allocated by the FSD and 84-85% of the students supported) The HEA model for allocating funding to these is based on the following assumptions:

- HEIs are considered to be better able to provide at least a minimum level of support for students with disabilities from mainstream funding. This is particularly the case for HEIs in receipt of HEA recurrent funding, given that the RGAM is partially informed by FSD beneficiary numbers.
- Larger institutions can benefit from economies of scale. Therefore, the same level of service could possibly be provided by a large HEI for a lower unit cost.

The HEA model for allocating funding to Irish HEIs is described below.

- Assessment of need and request for funding from eligible institutions:
 - ▶ The HEI assess eligibility of students for FSD support using criteria in the HEA FSD guidelines.
 - ▶ HEI completes an Assessment of Need with student.
 - ▶ HEI submits a paperless application (HEA Summary Request Form) outlining services and accommodations required for students with disabilities. HEIs indicate level of support required for PA, ISL/SpeedText and indicate transport costs sought where appropriate.
 - ▶ First-time claims are completed by the HEI on behalf of a student registering with Disability Services and seeking additional support, and can be submitted during any year of study on an approved course on submission of: appropriate Evidence of Disability documentation to the Disability Service, and completion of an Assessment of Need by the Disability Service.
 - ▶ For subsequent years of study (renewal applications), a claim for continuing support is made by the HEI to renew funding for the provision of supports and services. This only applies where the student is continuing study at the college beyond a period of one academic year.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

- ▶ For NI and EU Institutions renewal applications for students previously approved for the Fund are submitted on a standard renewal application form; no supporting documentation is needed with a renewal application form.
- **HEA allocates funding to eligible institutions** based on the data in the summary request form and using standard costings which vary according to type of support for example:
 - ▶ Standard cost per student of €950 allocated to each eligible student;
 - ▶ Standard costings allocated for ISL, SpeedText and personal assistance; and
 - ▶ 75% of transport costs approved in principle.
 - ▶ Funding calculated on this basis is moderated in light of the institutions' previous expenditure pattern. Allocation of funding varies year on year as capping is determined by the amount of funds available. Although unspent funding in a given year may be retained by the HEI, it is included in calculating funding for the following academic year.
- **Students that present late:** 'in the event that a student or students present for the first time to the disability officer after the final closing date, the institution has the discretion to use the funding allocation for that year to support the student as long as the institution has verified eligibility under the Fund in the normal way and has completed and documented a needs assessment. In such cases the institution should advise the HEA of the additional students being supported in this way'.

Whilst HEA guidelines provide some direction on what can be funded, they do not explicitly detail what can and cannot be funded.

HEIs are responsible for managing costs and spending at a local level, by determining the level of funding required to support individual students as set out in the Assessment of Need, and deducting this amount from the total allocation. Funding monies are not awarded to individual students but are managed by the Disability Services on their behalf, and allocation to support the student is dependent upon level of need.

With regards to **data collection and reporting processes**, HEIs are required to provide:

- Data for HEA evaluation and ESF reporting which is collected at point of application
- Four quarterly returns setting out all expenditure for the academic year under the Fund.
- A summary Form A, to be submitted with the Quarter 4 return, outlining for the academic year:
 - ▶ the number of students supported
 - ▶ the opening cash balance
 - ▶ any allocation released from the cash balance
 - ▶ cash payments received

- ▶ total expenditure
- ▶ current balance on hand.

The timescales associated with the processes are as follows:

- **Summary Request Form:** for funding in any academic year, there are two closing dates for submission of summary form: initial (October) and late closing date (January).
- **Allocation timeframe:** The FSD is funded from the Third Level Access Budget (TLA) which is allocated to the HEA (by DES) on an annual basis. HEA allocates Access Programme Funds (SAF and FSD) to Institutions on an academic year basis with FSD grants to colleges typically finalised early in the Spring term of an academic cycle. The funding is distributed to the institutions (not directly to students).
- **Data collection and reporting:** HEIs are required to complete quarterly returns to the HEA. The three other types of institutions have slightly different application and funding allocation methods. Compared to Irish HEIs, there are some differences in the process for Irish FEIs:
- **Timescales:** As FEI courses are only one year in duration the renewal process¹⁸ does not apply to FEIs and is not included in their guidelines.
- Assessment of need and request for funding from eligible institutions:
 - ▶ **FE Colleges determine eligibility for support;** the application process is paperless and no supporting documentation is submitted to HEA. As part of the application process, Colleges indicate level of support sought for “high needs” students (i.e. for personal assistance, ISL/SpeedText) and indicate costs required for transport where appropriate.
 - ▶ **HEA undertakes assessment/evaluation of all applications as a single process.** Eligibility for “high needs” supports (including transport) is determined on basis of disability category. HEA uses standard costs capped at maximum limits to determine total to be allocated to sector for high needs costs. The remainder of the overall FE budget divided by total number of eligible students to give a standard allocation per student. ¹⁹ Thus the FSD Grant to a college = (No. of eligible students X standard allocation) + Allocation for high needs supports.
 - ▶ **Funding Allocation:** the budget for the FE Sector is approved at HEA Finance Committee meeting as subset of the overall FSD budget. Funding is provided in the form of a block grant to an ETB.

18 For NI and EU institutions renewal applications for students previously approved for the Fund are submitted on the standard renewal application form; no supporting documentation is needed with a renewal application form..

19 FSD Grant to a college = (Number of eligible students X standard allocation) + Allocation for high needs supports.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

There are more substantial differences in the processes for NI and EU institutions (compared to both Irish HEIs and FEIs):

- **Funding allocation for a needs assessment:** HEA guidance for NI and EU institutions states that the Fund includes provision for a per-capita amount to assist with any verifiable additional cost to the institution of completing a needs assessment for approved first-time applicants. This is not referred to in FEI or HEI guidelines.
- **Assessment of need:** for FEIs and HEIs an assessment of need form should be completed in collaboration with the student prior to requesting supports and services. As assessment of need is not mandatory for NI and EU institutions and the guidelines for these suggested this is submitted 'only if available.'
- **Funding request form:** for FEI and HEIs the Funding Request Form is issued electronically by the HEA, while for NI and EU institutions application forms are available on request and are not available online. For NI/EU institutions, the application pack consists of: Signed application form (mandatory); documentary evidence/verification of the student's disability; list of supports requested and costings requested.
- **HEA determines students' eligibility** on basis of application and supporting documentation. Funding is allocated to colleges on a student-by-student basis:
 - ▶ SpLD students allocated a standard per-capita rate
 - ▶ Supports sought for other students assessed on a case-by-case basis
 - ▶ Funding for supports capped at maximum rates
 - ▶ Funding approved in Euros and capped at Irish rates
 - ▶ Funding usually transferred to colleges as a single amount
- **Reporting:** only the HEI and FEI guidelines state that institutions/colleges are required to comply with ESF monitoring/reporting requirements. NI/EU institutions are not required to submit expenditure returns to the HEA nor are they required to participate in the ESF co-funding process. However, HEA does request that colleges report any unspent funding at the end of any given year, which is used to part-fund the following year's allocation. In recent years HEA have moved to requesting refunds where large surpluses have built up in institutions.
- **Students that present late:** the FEI and HEI guidelines make some provision for these; this is not provided for in the NI or EU guidelines.

Comparing the grant allocation models for Irish HEIs and Irish FEIs (where the vast majority of the funding is spent), there are advantages and disadvantages of both approaches.

Table 4:8 Types of FSD expenditure

	Irish HEIs	Irish FEIs
Scale of funding/ numbers supported	<p>Accounts for approximately</p> <ul style="list-style-type: none"> 73-74% of the funding allocated by the FSD 84-85% of the students supported 	<p>Accounts for approximately</p> <ul style="list-style-type: none"> 23-24% of the funding allocated by the FSD 13% of the students supported
Advantages of grant allocation model	<ul style="list-style-type: none"> Paperless. Logical and consistent Data on students collected on application 	<ul style="list-style-type: none"> Efficiency – Impractical to assess over 1,350 individual applications Data on students collected on application
Disadvantages of grant allocation model	<ul style="list-style-type: none"> Institutions have reported that it is difficult to understand and difficult for them to estimate in advance their grant allocation. High levels of expenditure are “rewarded”. However, high levels of expenditure may not be indicative of best practice. In relying on expenditure returns from institutions, it means that the allocation process is delayed until late in the financial year. 	<ul style="list-style-type: none"> Lack of supporting documentation implies increase in oversight and QC by HEA (e.g. spot checks of supporting documentation, site visits etc.). This has not yet been formalised into the process.

4.4 Financial Provision of the Fund

4.4.1 Financial Provision of the FSD – Current

Considering the total number of students supported by the FSD, this has increased from around 3,500 to over 10,000 between 2007 and 2014 with large increases in recent years, e.g. +27.3% (2,153) from 7,897 in 2012/13 to 10,050 in 2014/15. The allocation of funding has remained broadly static in recent years: in 2015, this was €10.3m. This equates to a reduction of close to one third in **funding allocation per student per annum from €2,943 in 2007 to €1,025 in 2015.**

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

Considering the profile of funding:

- By institution type: the proportion/profile of funding allocated and number of students supported by institution type (HE, FE, etc.) has remained broadly stable.
- By category of spend, in 2014/15 the majority (88.2% (€7.145m)) was spent on services, whilst the next highest category was 10.7% (€863K) spent on assistive technology.
- By student category of disability, the most common category (50%+) is specific learning disabilities though there have been disproportionate increases in some categories: ADD, ASD, mental health condition.

The amount per student per annum by category of institution is illustrated in the table below illustrating that on a per capita basis, the funding equates to around €1,000 per year though this varies by type of institution.

Table 4.9: Financial Provision of the FSD

	FSD Funding Allocated – 2015/16 (to March 2016)	% of Students with disabilities supported by FSD in 2014/15	Approx. € per student per annum
Irish HEI's	73.3% (€7.594m) €3.9m to IoTs & €3.1m to universities	84.8%	€891
Irish FEIs	22.8% (€2.400m)	13.4%	€1,778
UK institutions	3.3% (€364k)	1.8%	€2,068
Total	€10.359m	100% (10,050)	€1,030

4.4.2 Transition from Second Level Education

Central Applications Office (CAO) data indicates that the number of applicants to HEIs: approx. 80,000 per annum and that of these, the number of applicants (via Leaving Certificate) this year is almost 60% (i.e. approx. 48,000).

The change in the number of applicants to HEIs from 2015 to 2016, approx. +2% as is the change in number of applicants to HEIs (via Leaving Cert this year) from 2015 to 2016, approx. +2%.

4.4.3 New Entrants by Disability Type

AHEAD data indicates that in 2014/15, there were 3,016 new entrants to HEIs with disabilities. This has changed substantially in recent years: the number of applicants to HEIs with disabilities: 2012/13 to 2014/2015 +29% (2337 to 3016). The most common categories are: specific learning disabilities (approx. 50%), mental health condition (approx. 10%), and significant ongoing illness (approx. 10%).

Some categories have seen significant growth (>100%) but from a relatively low baseline.

4.4.4. National Access Plan Targets

The National Plan for Equity of Access to HE 2015-19 includes targets for increased participation in higher education by people with disabilities.

To achieve the targets in the National Access Plan would see a gradual increase in the total proportion of students with disabilities (new entrants) from 6% to 8% by approximately 1,000 per annum assuming all other variables unchanged (and given current levels of new entrants with disabilities is approximately 3,000). This would place a corresponding increase in demand for total funding by around 10% (i.e. currently the fund supports around 10,000 students per annum so an increase of 1,000 per annum equates to 10%) or if the total funding remains unchanged this would equate to a reduction in funding per student per year to around 90% of its current level (i.e. if the level of funding of around €10m is allocated across 11,000 rather than 10,000 students per annum).

4.4.5 Financial Provision of the FSD – Moving from Current to Target

Feedback from consultation and analysis of the data indicates that trends in relation to students with disabilities in FE and HE are being influenced by the following factors:

- Increasing demand, particularly amongst students with mental health needs and those with an intellectual disability (e.g. those on the autistic spectrum);
- Increasing “pipeline” from second level education – due to greater support already provided in primary and second level education;
- Students and families more open to acknowledging a disability;
- Vocational training demanded by employers; and
- Greater awareness of accommodations available.

Considering available data on entrants and leavers to HE (students with disabilities), the status quo suggests around 3,000 enter and leave each year.

Allowing for some increases in the numbers of students with disabilities due to:

- Growth in new entrants in line with year on year trends (CAO data);
- New categories eligible for funding: part-time students;
- New categories eligible for funding/growth categories including ASD/ADHD, mental ill-health, etc.

4 FUND FOR STUDENTS WITH DISABILITIES – OVERVIEW (CONTINUED)

This yields an additional – close to 800 – number of students per annum with a corresponding increase in resource requirement of around €580K per annum.

These estimates also demonstrate that there is considerable movement towards the target set out in the National Access Plan.

Alternatively if there is no scope to increase the level of funding and that remains unchanged, the per capita level of funding will reduce.

As the level of funding is unlikely to change, overall, therefore, this brings challenges for HEIs:

- Changing behaviour to deliver more with the same level of resource
- The need to seek efficiencies
- An increased impetus to share good practice and learning
- The importance of targeting specific support where need is greatest
- Making best use of Access Funding to develop infrastructure
- A greater focus of Disability Services/Support staff on supporting students/developing services rather than fund administration.

**Table 4:10: Financial provision of the FSD – Projections 2020
(demand and resource requirements)**

	Number of students with disabilities in HEIs/supported by FSD	Impact on Resources
Baseline	Approx. 10,000	Current: € per student per year estimated as €1,025 in 2015
New entrants	New entrants with disabilities (AHEAD): 3,016 per annum	Number of new entrants and number of leavers closely balanced
Final Years/ Leavers	See Appendix B: FEI leavers each year = 961 + 142 (out of 1,357) HEI leavers each year = 1,780 (out of 8,486) Total leavers with disabilities = 2,883 out of 9,843	If no other changes to scope of fund, and assume the number of new entrants continues to increase, then the € per student per year will continue to reduce marginally as the number of students with disabilities increases in line with current trends
Additional entrants		
New entrants	Particular increases due to supports in to primary and secondary education New entrants (from Leaving Cert.) Est +2% per annum overall New entrants with disabilities (AHEAD): 3,016 per annum Assume similar growth of 2% pa in number with disabilities = +60 per annum	Assume €1,025 per student per year as per current i.e.: additional 60* 1025 = €61.5K per annum
New – part-time ²⁰	Category not previously funded => +440 students per annum (2015 data)	Assume €510 per student pa (50% of FT), i.e. additional €224K required
New categories of disabilities supported	Particular increases in types of disability (see Appendix A) ADD/ADHD increase from 202 to 305 from 2012/13 & 2014/15 ASD increased from 281 to 435 from 2012/13 & 2014/15 Mental ill health from 573 to 884 from 2012/13 & 2014/15 Overall: from 1,056 to 1,624 = +568 or +284 per annum	Assume €1,025 per student per year as per current i.e.: additional 284* 1,025 = €291K per annum Note: some may be high needs/ some may be low retention
Total	Additional: 784/approx. 800 per annum	Additional funding requirement of €580K per annum (assuming per capita rate remains the same as current)

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HEA developed estimates in 2016 that suggested there would be around 340 part-time students per annum with an additional funding requirement of around 161K; the methodology to develop this estimate differs but the two estimates are around the same order of magnitude.

Consultation Feedback on the Fund for Students with Disabilities

5



5 Consultation Feedback on the Fund for Students with Disabilities

5.1 HEIs/FEIs– Staff Survey

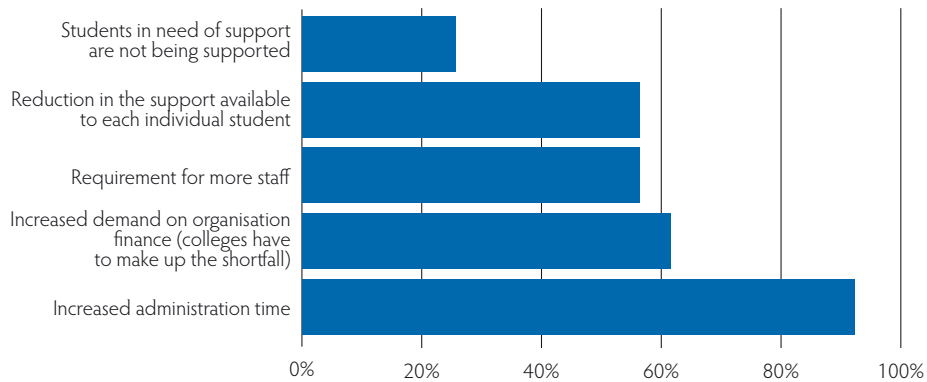
As part of the review, during 31 August – 15 September 2016 PACEC completed a survey of HEI/ FEI staff from institutions that had benefitted from the FSD. This was completed by 50 respondents. The following paragraphs provide a summary of the feedback received and further detail is provided in Appendix P - Part 3.

5.1.1 Demand for FSD

The majority of respondents (80%, n=40) stated that over the last three years the number of students supported by the FSD in their institution had increased while 20% stated that the numbers had stayed the same.

Respondents highlighted that the increase in demand for support from the FSD has led to a number of challenges for their institution, as illustrated below:

Figure 5:1 Challenges resulting from increased demand for support from FSD



Source: Review of Fund for Students with Disabilities – Survey of HEIs and FEIs, PACEC 2016

The majority of respondents (85.4%, n=41) also stated that they expected the number of students seeing support from the FSD to increase.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

5.1.2 Funding Available and Resources Associated with FSD

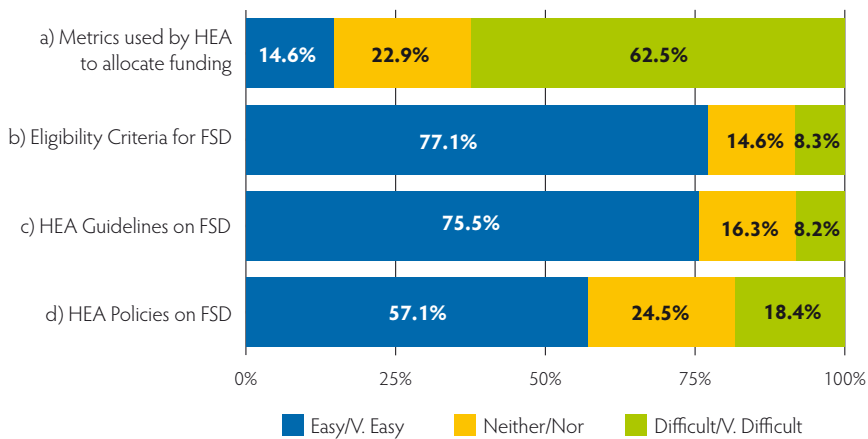
The majority of respondents believe that the level of funding awarded to their institution is too low (58.3%, n=28), highlighting the increase in students with high level needs. Specifically:

- Two thirds of respondents indicated that the FSD did not provide sufficient funding to meet the needs of each student eligible for support, in particular students with Specific Learning Difficulties (SLD), mental health conditions, deaf students, blind students, physical disabilities, autistic spectrum disorder and Attention Deficit (Hyperactivity) Disorder.
- Under half of respondents (47%, n=23) said there had been instances in their institution in which they had insufficient funds to support all those eligible for support through FSD.
- It was also highlighted by over two thirds of respondents (67.3%, n=33) that the capping of allocation had a negative impact on the support they could provide within their institution

5.1.3 Ease of Understanding and Satisfaction with the FSD

The majority of respondents found almost all aspects of the processes associated with the FSD easy or very easy to understand as shown in the figure below.

Figure 5:2 Understanding of FSD processes



Source: Review of Fund for Students with Disabilities – Survey of HEIs and FEIs, PACEC 2016 (Question 30). Note: All respondents could answer this question, not all respondents answered each part of the question therefore the following bases apply;

- Part a) and Part b) Two skipped this therefore the base is 48
- Part c) and Part d) One skipped this therefore the base is 49

In particular respondents found eligibility criteria (77.1%, n=37); HEA guidelines on FSD (75.5%, n=37); and HEA policies on FSD (57.1%, n=28) easy to understand. However, one aspect of the process was viewed differently: the majority found the metrics used by HEA to allocate funding to be difficult or very difficult (62.5%, n=30) to understand.

However, the majority of respondents expressed dissatisfaction with the timescales associated with the FSD. Specifically over 50% of respondents were dissatisfied or very dissatisfied with:

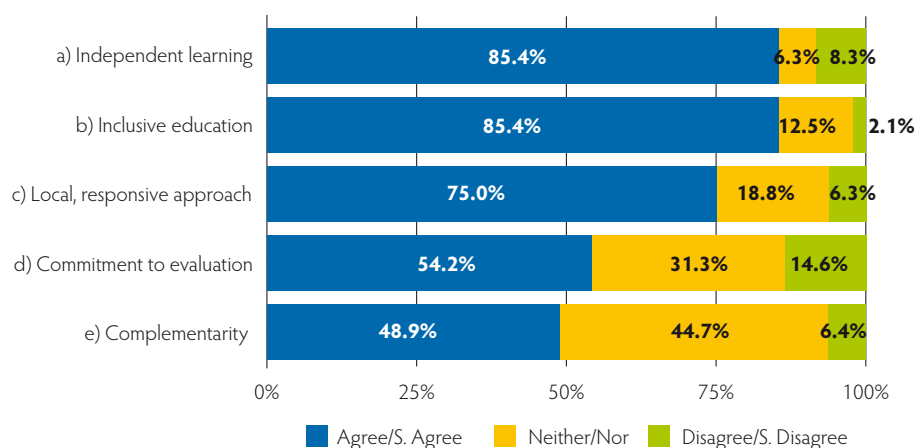
- The time taken for notification by HEA of allocation to the institution (68.8%, n=33); and
- The initial closing date for institution to submit Summary Request Form to HEA (52.1%, n=25).

However half of respondents (50.0%, n=24) were satisfied or very satisfied with the final closing date for institution to submit Summary Request Form to HEA.

5.1.4 Impacts of FSD

Overall students reported that the FSD has had a positive impacts in terms of access, completion and progression to further study. Specific impacts are illustrated below:

Figure 5:3 Extent to which respondents agree that they have been able to fulfil the key principles of FSD



Source: Review of Fund for Students with Disabilities – Survey of HEIs and FEIs, PACEC 2016 (Question 35).

Note: All respondents could answer this question. One respondent skipped each of the question parts (a) to (d) therefore the base for these questions is 48 while two respondents skipped part (e) therefore the base for this part of the question is 47.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

The majority of respondents said that they have been able to fulfil the principles of independent learning (85.4%, n=41), inclusive education (85.4%, n=41), local, responsive approach (75.0%, n=36), commitment to evaluation (54.2%, n=26), and complementarity (48.9%, n=23).

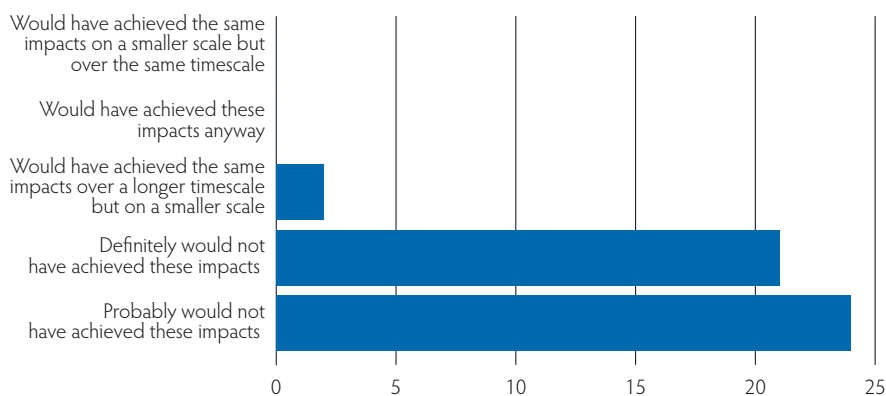
In relation to the impact of the FSD on students, respondents suggested that:

- it had a significant influence on participation in further and higher education (100.0%, n=49);
- retention and completion in further and higher education (100.0%, n=49);
- progression to access further study (97.9%, n=47); and
- development of independent learning and transferable skills (93.8%, n=45).

5.1.5 Additionality

Survey responses suggests that the FSD is providing high levels of additionality as just over half of respondents (51.1%, n=24) stated that their institution/the student probably would not have achieved the same impacts in the absence of the FSD while 44.7% (n=21) said they definitely would not have achieved these impacts. This is illustrated in the figure below.

Figure 5:4 Impacts achieved by respondents if FSD funding had not been available



Source: Review of Fund for Students with Disabilities – Survey of HEIs and FEIs, PACEC 2016 (Question 44).

Note: All respondents could answer this question. Three respondents skipped this question, therefore the base is 47.

While 4.3% (n=2) of respondents stated that in the absence of the FSD they would have achieved the same impacts this would have been over a longer timescale and on a smaller scale. The majority of respondents stated that a lack of funding would have prevented them from achieving the same impacts in the absence of FSD (95.7%, n=45).

5.1.6 Other Services/Supports for Students with Disabilities in Respondents' Organisation

The majority of respondents (over 50%) indicated that their institution provided other support to students with a disability; supports stated by over 80% of respondents included:

- inclusive learning;
- targeting of support needs;
- measures to enhance the accessibility of buildings, such as wheelchair lifts;
- universal design; and
- mainstreaming of services.

Survey responses also suggest that there is a wide range of roles involved in supporting students with disabilities and includes both a dedicated resource as well as staff incorporating this support into an existing role.

In addition, under half of respondents (45.8%, n=22) said that their institutions access external resources from organisations such as AHEAD, DARE, Dyslexia Association, National Learning Network, the National Council for the Blind, Student Finance and Deaf Hear to support students with disabilities.

5.1.7 Good Practice

Elements of current good practice that respondents stated were happening in their institution included:

- Provision of assistive technologies and other accommodations
- Provision of learning support
- Needs assessments
- Tailored/personalised support
- Promoting inclusivity

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

Areas for improvement that respondents cited included:

- More time and support for students
- Increased staffing resources
- Use of Universal Design for Learning Principles

5.1.8 Looking Ahead

Respondents highlighted the following areas for improvement going forward:

- Eligibility criteria: this should be amended to in relation to:
 - ▶ Part-time students: should be eligible for funding under FSD;
 - ▶ Evidencing: the required evidence for particular types of disability should be reviewed; and
 - ▶ Nationality: nationality criteria should be reviewed to include international and Erasmus students.
- Targeting: respondents highlighted that the following groups should be targeted:
 - ▶ Part-time students;
 - ▶ Those with Mental Health Issues. The FSD does provide support for those affected by mental health conditions²¹. However, the issue of targeting support for students in this category is based on a combination of factors: an increasing trend in the numbers of students affected by these conditions, lack of awareness/understanding that the FSD provides support for students with these conditions; and that providing evidence required by the FSD in respect of these conditions can be difficult, also the fluctuating nature of these conditions; and
 - ▶ Those without evidence.

Overall aspects of the FSD that respondents stated were working well included:

- Supporting students with disabilities
- Providing essential funding
- The application process
- The flexibility in administration of the Fund
- HEA Support

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including, but not exclusive to, the following: Bipolar Disorder, Schizophrenia, Clinical Depressive Conditions, Severe Anxiety, Severe Phobias, OCD, Severe Eating Disorders and Psychosis.

Aspects of the FSD which respondent stated could be improved included:

- Availability of more funding
- Clarity over allocation method/model
- Eligibility
- Evidencing

5.1.9 Summary of Key Points

Overall staff survey respondents highlighted that:

- The number of students supported by the FSD has been increasing, leading to a number of challenges for institution (e.g. increase administration time required)
- Level of funding provided is insufficient to meet the needs of eligible students
- The process of applying to the FSD is easy to understand however the timescales between submitting an application and receiving support are too long
- There are a number of positive outcomes as a result of FSD funding, in particular it had allowed for participation, retention and progression to access further study
- Key areas for improvement include expanding the eligibility criteria in relation to part-time students, the evidence required and nationality criteria as well as targeting of part-time students, those with mental ill health (in this instance targeting as in raising awareness and understanding of eligibility for FSD support) and those without evidence.

5.2 HEI/FEI – Staff Perspective – Site Visits x 5

During June 2016, semi-structured interviews were carried out with staff who have a role in how the fund supports students from five institutions²² that received FSD support.

5.2.1 Demand for the FSD

Interviewees highlighted that there has been an increased demand for support in the last three to four years mainly due to an increasing proportion of the student population presenting with a disability. While interviewees felt that the FSD has effectively supported students, there was also a perception that there are students that could benefit from support who are not currently eligible, e.g.: part-time students.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

5.2.2 Resources Allocated Within the Institution

The number of people involved in the management and administration of the FSD ranged from two to six people however the roles of those involved varied depending on the type of institution (some completed this work as part of their role while other institutions had a dedicated member of staff). It was difficult for staff to estimate the amount of time spent per annum managing and administering the FSD however they felt that the Fund should provide some allocation for administration.

5.2.3 Process/Administration

In four of the five site visits, overall, it is felt that HEA/FSD policies worked well and the process for developing and submitting the Funding Request Form was easy to understand and there was sufficient guidance provided.

All staff highlighted that the timescales for applying to the FSD were difficult to meet and were detrimental for students that identify late/after January and then need to wait to the following year. In addition, it was suggested that some students do not disclose that they have a disability when they first enter university and often do not disclose until they needed support (e.g. when completing exams) and by this time the deadline for application to the FSD has passed.

Feedback from staff in colleges under the auspices of Dublin and Dún Laoghaire Education and Training Board (DDLETB) was less positive – many felt that the process was unclear, complex, time-consuming and that HEA sharing information on allocations would be helpful.

5.2.4 Impacts

There was a widespread view that FSD had helped student participation and retention and that the FSD had supported students, particularly high needs students, to work and learn more independently. However there were mixed views on whether it had helped support participation due to its reactionary approach (i.e. supporting those that present with a disability). Other impacts mentioned by staff:

- Greater acceptance and a greater expectation of students with disabilities from college staff, other students and students with disabilities;
- Increased demand on tutors;
- Improvements in college resources; and
- Increased knowledge of issues pertaining to disabilities and measures that can help overcome these.

Some consultees noted that the FSD was having limited impact for some groups, for example those with mental health illness as their needs are less clear and possibly more complex, and that such needs may be different than those the FSD was originally set up to address.

5.2.5 Other Services

Staff interviewed at site visits referred to additional supports provided by their institution for students with a disability. These included: physical resources; interactive social activities specifically designed for students with ASD; workshops in relation to student welfare and student finance (not exclusive to students with a disability); specialised progression support services; health and welfare assistance; physical alterations to buildings where necessary; and timetabling accommodations.

Staff in colleges under the auspices of DDLETB highlighted very limited levels of resource available in their organisations.

5.2.6 Looking Ahead

Staff reported that the needs assessments on entry to higher education and communication with the HEA worked well however they also highlighted a number of areas for improvement in relation to:

- Additional funding
- Additional resources in colleges to support accessing FSD – both operational and management level;
- Level of funding/support available through FSD relative to time spent accessing this process is disproportionate – scope to simplify process?
- Extending the FSD to other students (e.g. part-time students and other categories in FE) or those with a general learning disability);
- General learning disability – not felt to be sufficiently catered for;
- Mainstreaming and funding for innovation – it was suggested that more supports could be mainstreamed and annual funding should be provided for innovation in the support for students at a national level;
- Equipment – a process to sell or donate equipment or guidance on equipment funded by the FSD at the end of a student's time in education would be beneficial;
- Staff training - beneficial if FSD funding could be provided for staff training to raise awareness of the range of disabilities and how they could support students; also awareness raising for students.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

- Timescales/timing – should be 3/4 opportunities for submission each year (i.e. greater flexibility of application deadlines for the Fund) to allow for those who are not diagnosed/do not disclose til later in the year;
- Application form – should be amended to allow greater detail/explanation regarding complex and dual disabilities;
- Greater flexibility in organisations in terms of how funding is used
- Follow-up – some felt that funding for follow-up of students that have benefitted from the FSD on a regular basis could be used to monitor the impact; and
- Transition from second to third level education and managing expectations of students with disability (may be accustomed to higher level of support in 2nd level education and/or some of the psychological reports assessing a disability and setting out supports required are vague and raise expectations.
- Evidence requirements – it was suggested that approaches such as a disability passport should be explored to avoid students having to be reassessed. However there was also a recognition that some students might want to adopt a more independent approach and use different coping strategies in 3rd level education (and avail of lower levels of support than in 2nd level).

It was also felt that the wide range of experience should be recognised across FE/HE and that there should be opportunities to share good practice.

5.2.7 Summary of Key Points

Overall staff interviewees highlighted that:

- Demand for support from the FSD is increasing due to the increased number of students presenting with a disability
- The process for applying to the FSD works well and is easy to understand however the timescales are difficult to meet and are detrimental for students that identify late
- The FSD has helped student participation and retention however it is having a limited impact for some groups (e.g. those with mental health conditions)
- Areas for development include additional funding/resources, widening of the eligibility criteria, mainstreaming of supports, revision of the application timescales, greater flexibility on how the funding is used and the potential to have a disability passport to avoid students having to be reassessed on entry to FE/HE.

5.3 Student Perspective (Focus Groups and Survey)

As part of the review, PACEC completed a survey of students that had benefitted from the FSD as well as focus groups with students as part of the site visits. Overall 21 students with disabilities attended focus groups during June 2016. The following paragraphs provide a summary of the feedback received and further detail is provided in Appendix M - Part 3.

5.3.1 Awareness of the Support Available for Students with Disabilities

While there were mixed views from focus group attendees on how easy it was to find out about support for students with a disability, the majority of survey respondents (97%) stated that they were aware of the support available. However there were low levels of awareness of the Fund for Students with Disabilities (FSD) amongst all students, with 46% of survey respondents stating they were not aware of the FSD.

5.3.2 Availability of Information about Support for Students with Disabilities

Overall, student feedback suggests that while they are aware of the types of support available, additional information would be beneficial to ensure they are fully informed about the options available to them (41% of survey respondents felt that there was not enough information available to them on the support available in their institution).

In addition, it was suggested that communication between disability support staff and teaching staff could be improved to ensure they are more fully aware of the needs of their students and how best to support these so students get the correct support at the outset.

5.3.3 Accessing Support

There were mixed views amongst students regarding the process for accessing support as while 90% of survey respondents agreed or strongly agreed that they knew who to speak to in their college to access support, students who attended the focus groups stated that the process for accessing supports within their institution was not clear and they did not know what processes staff went through to either assess support or decide what support they needed.

However, both survey respondents and focus group attendees noted a lack of clarity on eligibility and what supports they were eligible to apply for. No focus group attendees knew what the eligibility criteria for the FSD were.

5.3.4 Support Accessed

Student feedback indicates that they had availed of a range of supports including exam support (the most common amongst survey respondents as 71% referred to this), assistive technology, academic/learning support, personal assistants and other support such as printing credits.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

Overall students provided positive feedback on the support they had received and believed that it had met their needs. Specifically, 73% of survey respondents stated the support they received was “about right” while 8.5% stated they had received “more support than they require”, however 19% stated the support was “insufficient to adequately meet their needs”.

5.3.5 Impacts

Student feedback suggests that they would not have been able to enter third level education in the absence of disability support, with 56% of survey respondents stating that the availability of support strongly influenced their progression to further study. In addition, students suggested that they would have struggled with exams or would have become more isolated/less confident and that the support received helped them to become more independent, with 51% of survey respondents stating that the support provided influenced their decision to remain in higher education.

5.3.6 Learning

Specific actions suggested by students that institutions could do to support students with disabilities included:

- Increased communication between disability support services and lecturers;
- Awareness training for lecturers/teaching staff so they are better equipped to support students with a disability;
- More opportunities for peer support/group interactions for students to discuss how they manage their disability/what supports they have as well as social support;
- Orientation for students with a disability to promote the FSD and/or university disability support available;
- Promotion of supports available at higher education to students at secondary school;
- Learning support outside of class time/college hours; and
- Mainstreaming of services for disabled students.

5.3.7 Summary of Key Points

Overall student survey respondent and interviewees highlighted that:

- There is mixed awareness amongst students of the FSD and there is not enough information on the types of support available
- There are mixed views on the process for accessing support; there is a lack of clarity on eligibility
- Students have accessed a range of supports and reported that these met their needs

- The FSD has had a positive impact on students' decisions to progress to further/higher education and without support they would have struggled to remain
- Suggested areas for improvement include increased communication between disability support and lecturers, awareness training for staff, increase opportunities for peer support, greater promotion of the FSD and the supports available to students and mainstreaming of supports.

5.4 Stakeholder Feedback

As part of the review, PACEC gathered feedback from 19 key stakeholders via email and one-to-one/telephone consultations during August to September 2016. This included key stakeholders from the disability and higher education sector in Ireland. The following paragraphs provide a summary of the feedback received and further detail is provided in Appendix L - Part 3.

5.4.1 Financial Provision of the FSD

Many of the interviewees referred to an increasing demand for the FSD due to the increasing number of students with disabilities entering further or higher education, and in particular amongst students with mental health needs, dyslexia and those with autism/on the autistic spectrum. Suggested reasons for this increase included:

- Increasing "pipeline" from second level education – due to greater support already provided in primary and second level education
- Support at second level improved – more people with, e.g. ASD presenting at this stage;
- Increasing demand, particularly amongst students with mental health needs and those with an intellectual disability (e.g. those on the autistic spectrum)
- Students and families more open to acknowledging a disability
- Increased awareness around ASD/mental health and disclosure and willingness to seek support
- Vocational training demanded by employers
- Greater awareness of accommodations available
- During/after the recession in the construction industry many had to go back to college and retrain – may have been students with dyslexia etc.

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

5.4.2 HEA Model and Guidelines

Findings from the interviews highlighted that the HEA model of allocating and reporting on the FSD differs from some other support mechanisms. Specifically, the FSD is tied to specific 'students' and their needs – this was viewed as particularly restrictive for FEIs as they are unable to build up infrastructure over time (i.e. students will only have support for one year). Several interviewees highlighted the benefit of making the FSD allocation more flexible, possibly through the provision of a block grant based on up to date data on the number of students with disabilities in each institution. This funding could be used by staff to support students in the most relevant and appropriate ways - for example this could include curriculum modification, staff awareness raising/training on how to use specific hardware, as well as universal design.

Many consultees highlighted that the current model excludes a number of categories of student that would benefit from the FSD, including part-time students and also, for example, it was highlighted that in FE there are five course types that students with a disability can attend however only one is eligible for support from the FSD; this means that there are a number of people with a disability that are not being supported despite being part of the 'target group'. Furthermore, it was emphasised that deaf people cannot access the FSD on a part-time course when this may be more suitable for them.

It was also suggested that the FSD evidence requirements should be reviewed and modified to remove what was perceived as a potential barrier to some students accessing the Fund. For example, one interviewee referred to an instance when a student with an amputated leg had a letter from their GP, however this was insufficient evidence as they did not have a letter from their consultant. The student was unable to obtain this due to the length of time that had passed since their operation and without FSD funding could not attend college.

It was also suggested that those 'without a label' (i.e. undiagnosed) may require more support (as those with a 'label' had accessed support before, while those without a diagnosis have not). For example, one student with a mental health illness had dropped out of higher education as it took their parent six months to obtain the required paperwork, in this time their illness deteriorated and three years later they were still in same position after dropping out (at home with no higher education qualification). Therefore, it was suggested that there should be an option where students are not turned away because of lack of evidence or 'label', for example the HEA Erasmus Plus programme is more flexible as it supports students that are not registered with the disability office, however students still have to provide verified evidence of their need.

5.4.3 Student Experience of the Fund

It was suggested by at least one consultee that the FSD influences students to attend further or higher education, as it may be impossible for them to attend without support, as well as influencing their course choice (e.g. deaf students, this influences their course choice as FSD is not provided to part-time students). However many students are not aware of FSD nor that the support they receive is funded by this.

Anecdotal feedback from interviewees on the student experience of the FSD included that students are happy with the support they receive, in particular those that were not initially aware that support was available. However it was also noted that:

- If funding is not provided from when students first attend university or college they miss out on important support
- There is also a need for provide greater learning support (e.g. someone to a “check-in” with students on a weekly or fortnightly basis)

5.4.4 Educational Institutions and the Fund

There are other supports available to students with a disability however these are not designed for students with specific categories of disability.

There were felt to be opportunities for mainstreaming some supports as these would be of greater benefit to a wider number of students at little additional cost; there was also felt to be more that the FEIs and HEIs could do to make best use of their access funding allocation received as part of their RGAM finance. Also that there was scope for institutions to learn from each other – particularly those with a lot of good practice being able to share this with less experienced institutions.

It was suggested that there is an opportunity for staff in the FSD to promote the Erasmus Plus scheme, highlighting that it provides support towards the additional costs of studying abroad and the fact they are studying abroad does not affect the support they can avail of.

5.4.5 Summary of Key Points

Overall key stakeholders highlighted that:

- There is an increasing demand for the FSD due to the increasing number of students with disabilities presenting in further and higher education
- HEA FSD model is restrictive as it is tied to specific students and their needs which is particularly restrictive for FEI as they are unable to build up infrastructure over time
- The current model excludes a number of students that would benefit from FSD support (e.g. part-time students)

5 CONSULTATION FEEDBACK ON THE FUND FOR STUDENTS WITH DISABILITIES (CONTINUED)

- Evidence requirements should be reviewed and modified (e.g. to relax the time frame for medical reports)
- While there are other supports available to students with a disability these are not designed for specific categories of disability/there is no overlap with the FSD

5.5 Summary

Overall consultees highlighted that there is an increasing demand for the FSD due to the growing number of young people that are disclosing a disability however the level of funding is currently insufficient to meet the needs of eligible students. It was suggested that the FSD could be delivered more efficiently if a universal design model were used (evidence from the consultations indicates that some institutions have mainstream supports in place and use the FSD to support more high needs students) or if a block grant were provided to allow the funding to be used by staff to support students in the most relevant way that would allow for more efficient use of funds/resources.

Consultees also felt that while the administration process was easy to understand the timescales involved should be revised to allow for those presenting late, as well as shortening the time taken to process applications to ensure support is in place as soon as possible.

Whilst feedback from consultees highlighted the positive impacts of the FSD in relation to participation, retention and progression (see table overleaf), it was also suggested that there is scope for the FSD to do more. For example, some students require greater support (e.g. those with mental ill health) as well as those not currently eligible for support (e.g. part-time students).

Table 5:1 Impact of FSD in supporting national equity of access policy in relation to participation, retention, etc.

Impact of FSD in supporting national equity of access policy			
	Evidence from students	Evidence from HEIs/FEIs	Other evidence
Participation in FE/HE	<p>Student survey: 56% responded that support had strong/some influence on progression to FE/HE</p> <p>Student focus groups: would not have been able to enter third level education and/or remain in third level education in the absence of disability support noting that they would have struggled with exams or would have become more isolated/less confident and that the support received has helped them to become more independent.</p>	<p>Site visits: Mixed views on whether FSD helped support participation due to reactionary approach (i.e. supporting those that present with a disability)</p> <p>Staff survey: 100% agreed - some/strong influence on participation in FE/HE</p>	<p>HEA stats: No. of students with disability approved to benefit from FSD: 7,897 in 2012/13 to 10,050 in 2014/15 (approx. 27%)</p>

Impact of FSD in supporting national equity of access policy			
	Evidence from students	Evidence from HEIs/FEIs	Other evidence
Independent Learning	<p>Student survey: 55% - support had strong/some influence on development of independent learning & transferable skills</p> <p>Student focus groups: those in receipt of support noted that while they had received less support at university it had helped them to become more independent, with one student noting that “at secondary school received all the help you can get, at third level you are encouraged to get the help you need”</p>	<p>Site visits: Supported students, particularly high needs, to work and learn more independently</p> <p>Staff survey: 94% - some/strong influence on development of independent learning & transferable skills</p>	
Retention	<p>Student survey: 51% responded that support provided had a strong/some influence on their decision to remain in higher education (i.e. to complete the course rather than dropping out)</p> <p>Student focus groups: stated that they would not have been able to enter third level education and/or remain in third level education in the absence of disability support</p>	<p>Site visits: Helped student retention</p> <p>Staff survey: 100% agreed - some/strong influence on retention and completion in FE/HE</p>	Data in Appendix B – Part 1 (Section 2.5.2) shows that FSD is supporting students in years other than first year (around one third are in first year), providing evidence that FSD is contributing to retention
Access to Labour Market and Further Study	<p>Student survey: Support provided had strong/some influence on access to labour market (37%) and strong/some influence on access to further study (56%)</p>	<p>Staff survey: Some/strong influence on access to labour market (69% agreed) and some/strong influence on access to further study (98% agreed)</p>	
Other issues - impacts	<p>Student survey: Support provided had a strong/some influence on choice of college (40%) and strong/some influence on choice of course (27%)</p>	<p>Site visits: Limited impact for some groups, e.g.: those with mental health illness as needs are less clear and possibly more complex. Also that such needs may be different to what FSD originally set up to do.</p> <p>Staff survey: High level of additionality: 51% probably/45% definitely would not have achieved these impacts in the absence of FSD</p>	

Benchmarking – Interventions to support Students with Disabilities in Other Jurisdictions



6 Benchmarking – Interventions to support Students with Disabilities in Other Jurisdictions

6.1 Introduction

The section provides an overview of other mechanisms and models which support students with a disability to enter and remain in higher education. These are:

- UK – Disabled Student Allowance (DSA) scheme: provides support to disabled students in higher education who cannot enrol or obtain higher education without support
- USA – Free Application for Federal Student Aid (FAFSA): provides federal grants, loans and work-study funds to those attending college or career school. This is aid that is available to most students and not exclusively disabled students
- Australia - Disability Support Program (DSP): provides funding to higher education institutions to support students with disabilities

These were selected on the basis that:

- the eligible forms of support are similar to FSD; and
- there are differences in the allocation models and timescales which could provide useful learning.

Detailed descriptions of the benchmarking exercise can be found in Appendix J - Part 2.

6.2 UK – Disabled Student Allowance (DSA) scheme

6.2.1 Purpose of the DSA

The purpose of the DSA is to provide support to students with disabilities in higher education who cannot enrol or obtain higher education without support. This allowance is used to acquire specialist equipment, general allowance and travel allowance that the student may need in order to help obtain higher qualification which will enhance job prospects and pursue greater careers helping promote independence amongst disabled people^{23 24}.

The Department for Business, Innovation and Skills (BIS) control government policy for administration of the DSA, with Student Finance responsible for processing applications and providing support. Financed by the UK government, the scheme is managed by various funding bodies including: Student Finance England (SFE); Student Finance Wales (SFW); Student Finance Northern Ireland (SFNI); Students Awards Agency Scotland (SAAS); Isle of Man (means-tested); States of Jersey; Research Councils; NHS Bursaries; and Social Work Bursaries.

23 Evaluation of Provision and Support for Disabled Students in Higher Education- Report to HEFCE and HEFCW by the Centre for Disability Studies and School of Sociology and Social Policy at the University of Leeds (2009).

24 Student Services guide to Disabled Students Allowances (DSAs) 2016/17 available at: [http://www.nhsbsa.nhs.uk/Students/Documents/Students/Disabled_Students_Allowances_\(DSAs\)_2016-17_\(V1\)_06.2016.pdf](http://www.nhsbsa.nhs.uk/Students/Documents/Students/Disabled_Students_Allowances_(DSAs)_2016-17_(V1)_06.2016.pdf).

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

Students apply directly for support and monies are paid direct to the student, or direct to a helper or equipment supplier.²⁵

The DSA is paid in respect of additional expenditure that a student is obliged to incur to undertake a course of higher education because of a disability to which they are subject. Disability in this context includes a long-term health condition, mental health condition or specific learning difficulty such as dyslexia. DSAs are paid in addition to the standard student support package. This support is not means tested and does not have to be repaid.

6.2.2 Scale of Funding and Number of Students Supported

The amount of funding provided depends on individual needs; for example in 2016/17 the maximum amount of help available is shown below:

Table 6:1: Funding available 2016/17

Full-Time	Up to £20,725 a year
Part-Time	Percentage of full-time amount, depending on how intensive the part-time course is, up to £15,543 a year

Source: http://media.slc.co.uk/sfe/1617/ft/sfe_disabled_students_allowance_guide_1617_d.pdf

Government spending on DSAs has increased annually most recently from £145m, in 2011/12 to £146m in 2012/13 and to £152.7m in 2013/14^{26&27}. The number of full-time undergraduates supported has also increased, from 53,000 in 2011/12 to 56,600 in 2012/13 to 58,500 in 2013/14²⁸. Including part-time undergraduates and postgraduate students, the numbers supported in these years were: 61,000 increasing to 64,500 and then to 65,900²⁹. Spend per student reduced from approximately £2.3K to £2.1K for undergraduate full-time students, £2.6K to £2.4K part-time undergraduates and £2.5K to £2.0K postgraduate students.

25 <http://www.disabilityrightsuk.org/applying-disabled-student-allowances-dsas>.

26 Department of Business, Innovation and Skills (2014) Disabled Students' Allowances: Equality Analysis.

27 Information provided by Department for Education to PACEC (September 2016).

28 Department of Business, Innovation and Skills (2014) Disabled Students' Allowances: Equality Analysis.

29 Department of Business, Innovation and Skills (2014) Disabled Students' Allowances: Equality Analysis.

6.2.3 Implementation of DSA

Eligibility³⁰

A student can apply for a DSA if they have a disability, including a mental-health condition or a specific learning difficulty and:

- are on an eligible full or part-time undergraduate course (for example, a degree or Higher National Diploma (HND)-level course) including distance-learning courses; or
- are on an eligible postgraduate course (which you need a degree or equivalent qualification to get onto), including distance learning courses.

Part-time students are eligible for DSAs as long as it is a designated course and they are studying at least 25% of the full-time equivalent.

A student cannot apply for a DSA if they are:

- getting support equivalent to DSAs from another funding provider;
- an EU student;
- an overseas student;
- getting funding from the NHS;
- getting funding from a research council; or
- a sandwich-course student on a full-year placement.

Therefore, while undergraduate and postgraduate full and part-time students are eligible for DSA support; EU/international students are not.

Categories of disability that are eligible for support are:

- Autistic Spectrum Disorder (including Asperger's syndrome)
- Attention Deficit Disorder/Attention Deficit Hyperactivity Disorder
- Blind/Vision Impaired
- Deaf/Hard of Hearing
- Mental Health Condition (including, but not exclusive to, the following: Bipolar Disorder, Schizophrenia, Clinical Depressive Conditions, Severe Anxiety, Severe Phobias, OCD, Severe Eating Disorders and Psychosis)
- Neurological Condition (including Brain Injury, Epilepsy, Speech & Language Disabilities)

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

- Significant Ongoing Illness
- Physical/mobility
- Developmental Co-ordination Disorder
- (Dyspraxia/Dysgraphia)
- Specific Learning Difficulties (Dyslexia or Dyscalculia)

The DSA requires proof of a disability through a Needs Assessment sourced from approved assessment centres, which specifies specialist equipment, Non Medical Help (e.g. interpreters, note-takers, general assistants) and disability related travel costs. DSAs are not means-tested however students must meet the definition of disability under the Equality Act 2010, and provide evidence of a disability or long-term health condition, a mental health condition, or a specific learning disability. DSA regulations 2015 - 2016 include students with general learning difficulties however they do not qualify for funded supports as “institution academic support is appropriate.”

In summary, the DSA requires the submission of medical evidence in the form of a report or letter from a medical professional/practitioner for each disability category does not specify a timeframe for medical reports and also allows for GP reports/letters to be submitted as evidence.

Support Available³¹

The type of support available, eligible and ineligible expenditure is as follows:

The types of services and accommodations provided are:

- Assistive technology, equipment and software
- Support workers and non-medical assistants
- Travel costs/transport

Eligible expenditure: funding can be used to provide supports and accommodations in any of the following four categories:

- Assistive technology, equipment and software
- Repairs, technical assistance, insurance and warranty of assistive technology, equipment and software
- Support workers
- Non-medical assistants

31

Student Finance England: A guide to Disabled Students' Allowances 2016 to 2017 available at http://media.slc.co.uk/sfe/1617/ft/sfe_disabled_students_allowance_guide_1617_d.pdf.

- Note-takers
- Transport

Ineligible expenditure: the Fund does not cover expenditure on any of the following:

- Assessment to prove disability
- Non-medical helpers from a family member or friend unless they are registered with DSA-QAG and comply with legislation

Processes and Timescales for Accessing Funding

The process for applying for a DSA is as follows³²:

- Students can indicate that they wish to apply for a DSA when applying for their main Student finance; they will then be sent an application form;
- Once students have applied for a DSA (and are deemed eligible for support), they will be asked to arrange an appointment with an Independent Needs Assessor (nearest specialist assessor or centre – most commonly a private company specialising in disability support) to find out what equipment and support they need;
- A Needs Assessment Report is then produced which provides recommendations of the support needed (tends to focus on Non Medical Helper³³ and assistive technology to support academic activities);
- The student will receive confirmation from the funding body of what specialist equipment and other support DSAs can pay for and any instructions for ordering any specialist equipment or arranging other support.

Allocation is based on the student Needs Assessment. The maximum allowances are³⁴:

- Specialist Equipment Allowance: Full-time: up to £5,212 for whole course; Part-time: up to £5,212 for whole course
- Non-Medical Helper (NMH) Allowance: Full-time: up to £20,725 a year; Part-time: up to £15,543 a year
- General Allowances: Full-time: up to £1,741 a year; Part-time: up to £1,305 a year

Postgraduates have a single allowance of up to £10,362 per year.

32 http://media.slc.co.uk/sfe/1617/ft/sfe_disabled_students_allowance_guide_1617_d.pdf

33 NMH is provided within four distinct categories: Band 1: personal assistants, library assistants, readers and scribes; Band 2: manual note-takers, study and examination assistants, lab assistant, sighted guide; Band 3: communication assistant, electronic note-taker, transcription services, and mobility training; Band 4: BSL interpretation and language support, specialist mentors, one-to-one study skills, and AT training.

34 Disabled Students' Allowance (DSA) | Gov.uk available at: <https://www.gov.uk/disabled-students-allowances-dsas/what-youll-get>.

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

The application process for DSA can take approximately 14 weeks³⁵ and eligible students with a disability from England can apply for DSAs as soon as Student Finance England launches the application process and have a nine month window from the start of the Academic Year (see table below). Applications received after the nine month time limit are managed on a case by case basis and additional evidence may be requested to support a late application.³⁶ The reasons provided will be considered by Student Finance England and students who are not accepted for that academic year are encouraged to apply for future years of their course.

Table 6:2: Academic year start dates and nine month time limit

Academic Year Start	9 Month Time Limit
1st September	1st June
1st January	1st October
1st April	1st January
1st July	1st April

Source: 16/17 DSA Guidance

From 2016/17, significant changes to DSA have resulted in a tightening of allowable costs and criteria for awarding funding against individual students. DSA has moved towards a universal design approach and will no longer fund the majority of NMH, expecting HEIs to address Reasonable Accommodations by applying Universal Design for Learning (UDL) policies and address such supports through strategies that provide accessibility and inclusivity.

The stated objective of the changes to DSA is to shift from a framework providing an individualised assessment and funding of additional support to a position where the additional support requirements of disabled students are a usual consideration for universities and are integrated into the practices of the institution.³⁷ The key changes are³⁸:

- Inclusive practice:
 - ▶ HEIs are required to develop an inclusive teaching and learning strategy to ensure course design, delivery and assessment is accessible to students with disabilities.
 - ▶ HE providers are expected to consider how they deliver information to students and whether strategies can be put in place to reduce the need for support workers and encourage greater independence and autonomy for their disabled students.

35 http://www.practitioners.slc.co.uk/media/2646/sfe_dsa_guide_1516_d_pf.pdf

36 However, this can be extended where SFE are satisfied that the application has been made as soon as possible. Students who are applying for DSA support nine months after the start of their course will need to provide information with their application to explain why it is being submitted after the nine month time limit.

37 DSA guidance for New DSA students 2016/17, p.3.

38 <https://www2.warwick.ac.uk/services/tutors/disability/allowances/dsachanges/>.

- Equipment:
 - ▶ Students who are awarded funding for a computer via DSA are now required to contribute £200 towards its cost.
 - ▶ Standard computer peripherals and other accessories will now be funded by exception only.
 - ▶ Individual printing and scanning devices will only be funded through DSAs if the need cannot be met through other measures. HE providers are expected to strive to meet the needs of their disabled students to reduce the need for the purchase of individual devices for printing and scanning.
 - ▶ Equipment funded through DSA belongs to the student and repairs or warranty costs are also met by the DSA.
- Services:
 - ▶ DSAs will retain primary responsibility for funding most specialist non-medical help support (such as specialist study skills and mentoring) with the exception of Specialist Transcription Services.
 - ▶ HE providers will be expected to take primary responsibility for the provision of Specialist Transcription Services, other than by exception.
 - ▶ HE providers will be expected to take primary responsibility for the remainder of the non-medical support roles that are classified as bands 1 or 2 (such as note taking).
 - ▶ DSA will retain primary responsibility for funding Sighted Guides, for those students that need such support to enable them to get around campus effectively.
- Accommodation:
 - ▶ DSA will meet the additional costs of accommodation where that is not provided by the HE provider or its agent. DSA funding will not be available where specialist accommodation is provided by the HE provider or their agent, other than by exception. HE providers should no longer pass any additional costs for accommodation onto the student.

Specifically, the revised DSA guidance states that funding through DSAs should be the 'top of an apex of support', underpinned by an inclusive environment, and individual reasonable adjustments where required.³⁹ This is a new approach and the impacts are yet to be evaluated; however data on students supported by the DSA shows that in England 62.2% of disabled students receiving DSA earned a first class or upper class second honours compared to 60.4% of disabled students who did not receive DSA who earned a first class or upper class second honours⁴⁰.

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

6.2.4 Key Lessons

- Purpose of the DSA – similar to FSD, to provide support to students with disabilities in higher education who cannot enrol or obtain higher education without support
- Scale of funding – DSA funding is higher than FSD (£2.0 - £2.5K per capita between 2011/12 and 2013/14) compared to €866 per capita ⁴¹ (FSD 2013/14)).
- Categories of disability eligible for support – the DSA and FSD support the same range of disability categories;
- Categories of student eligible for support – the DSA supports part-time students while the FSD does not; neither DSA nor FSD supports EU/international students though the FSD supports Irish students studying in other jurisdictions.
- Timescales – the DSA operates a rolling application process whereby students can submit an application in the nine months after the start of their academic year which differs from the much shorter timescales operated by the FSD (focused on the first quarter of the academic year);
- Allocation model – the DSA is moving away from individualised needs assessment and funding of additional support to address specific needs towards a universal design approach which seeks to provide most additional supports through accessible, inclusive strategies that are integrated into the practices of the HEIs.

6.3 USA - Free Application for Federal Student Aid (FAFSA)

6.3.1 Purpose of FAFSA

HEIs in the USA have a legal obligation to ensure accessibility of programmes and services to students with disabilities⁴². They may not impose part or all of the costs of Reasonable Accommodations (RAs) on students and retain ultimate responsibility for providing necessary RAs. However, in order to meet their obligations, HEIs assist students to identify and apply for financial aid or reimbursement of costs from outside agencies or organizations.

Students are individually responsible for ensuring that they are eligible for funding, and for seeking out the range of funding opportunities for RAs in their chosen college, prior to accepting a place. They must be aware of how disability-related expenses may affect financial aid and which of these are covered by benefits and support agencies.

41 €8,701,721/10,050 students.

42 Under section 504 of the Rehabilitation Act 1973, which prohibits discrimination of individuals with disabilities by any program, and the Americans with Disabilities Act 1990 (amended 2008).

To be assessed for a government funded loan, all students apply through the **Free Application for Federal Student Aid (FAFSA)** which is means-tested and collates information about dependency, financial status and citizenship. Grants are not re-payable and may be available from State and Federal sources as well as individual HEIs, therefore stricter eligibility criteria apply.

The purpose of the FAFSA is to provide federal grants, loans and work-study funds to those attending college or career school. This is aid that is available to most students (not just disabled students)⁴³ however there is specific aid available to students with intellectual disabilities as well as those with significant ongoing illnesses.

Students apply directly for support and any financial aid they are eligible to receive is paid through the college. Typically the college will first use the aid to pay tuition, fees and room and board (if provided by the college). Any remaining aid is paid to the student for other educational expenses.⁴⁴

6.3.2 Scale of Funding and Number of Students Supported

Federal Student Aid offers several different types of financial aid. Four of the most common types of aid students are offered from the federal government as a result of completing a FAFSA are:

- Pell Grant – A grant of up to \$5,815 (as of 2016-17 Award Year) for students with a low expected family contribution;
- Stafford Loans or Direct Stafford Loans –Subsidized and unsubsidized loans are federal student loans for eligible students to help cover the cost of higher education at a four-year college or university, community college, or trade, career, or technical school. The US Department of Education offers eligible students at participating schools Direct Subsidized and Unsubsidized Loans.
- Federal Perkins Loan – A low-interest loan similar to the Stafford lent directly by schools for undergraduate and graduate students with exceptional financial need.
- The Federal Work-Study Program – A program where students can get part-time work, up to a certain amount. In most cases, the federal government pays half of a student's wage and the school pays the other half.

Students with an intellectual disability may receive funding from the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant or Federal Work-Study programs.

43 Free Application for Federal Student Aid (FAFSA) available at: <https://studentaid.ed.gov/sa/about>.
44 FAFSA Guidance 2016/17 (<https://fafsa.ed.gov/fotw1617/pdf/PdfFafsa16-17.pdf>).

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

6.3.3 Implementation of FAFSA

Eligibility

For a student to receive FAFSA they must be a:

- US Citizen or US National

Or alternatively:

- Have a Green Card;
- Arrival-Departure Record;
- Battered Immigrant Status; or
- Have a T-Visa.

Some of the categories of disability that FAFSA supports include:

- Blind/Vision Impaired
- Deaf/Hard of Hearing
- Significant Ongoing Illness
- General Learning Difficulty (Including Intellectual Difficulty and Learning Difficulties resulting from an Acquired Brain Injury)

FAFSA requires the submission of medical evidence for blind/vision impaired, deaf/hard of hearing and significant ongoing illness.

Support Available

Federal student aid covers such expenses as⁴⁵:

- tuition and fees
- room and board
- books and supplies, and transportation.

Aid also can help pay for other related expenses, such as a computer and dependent care.

Processes and Timescales for Accessing Funding

The process for applying for FAFSA is as follows

- Students are required to submit an application containing information such as their social security number, income and savings.
- The office of Federal Student Aid at the U.S. Department of Education then sends a Student Aid Report (SAR) which is a summary of the FAFSA data submitted within three days to three weeks after the FAFSA is submitted.
- The college or career school that the student had applied to (and has been accepted to attend) then calculates the aid that will be offered and sends an aid or award letter to the student stating how much they are eligible to receive.
- In some instances students will be selected for verification to confirm that the data provided on the FAFSA is accurate.

The application window for FAFSA opens each year in October with the deadline at the end of June.⁴⁶

The application processor must receive completed applications no later than 30 June. The relevant school must have the correct and complete application information by the last day of enrolment during the 2016–17 year, or by mid-September 2017 whichever comes first. There are no exceptions to these dates.⁴⁷

The USA FAFSA operates a different model as this provides a mechanism for students to apply for financial aid using one form that is then sent to a number of different support agencies (e.g. for federal aid, state aid and college or career school aid). This provides the student with a range of financial options to choose from and they are able to select those that are most suited to their circumstances.

6.3.4 Other Supports for Students with Disabilities

Students with disabilities may also be eligible for financial assistance through their state's Vocational Rehabilitation Program; these help people with disabilities gain employment but can include financial help to meet an individual's employment goals. Scholarships are similar to grants and are typically awarded based upon merit or other criteria. There are also numerous disability-specific scholarships such as: National Federation of the Blind and the Alexander Graham Bell Association for the Deaf or Hard of Hearing.

46 FAFSA Changes | FAFSA available at: <https://studentaid.ed.gov/sa/about/announcements/fafsa-changes>.
47 <https://studentaid.ed.gov/sa/sites/default/files/2016-17-completing-fafsa.pdf>.

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

The Department of Education administers HE grant programs that are awarded to HEIs, who then apply these to support individual students. The **Federal TRIO Programs** provide services to disadvantaged students including individuals with disabilities in HE. Grants are competitive and awarded directly to the HEI for a period of five years and for a minimum of \$200,000. Students must be eligible to receive support via the program which may provide tutoring and mentoring services, study skills and time management, career exploration, and help with applying for financial aid. **Vocational Rehabilitation Services** may include counselling, sensory and other technological aids and devices, and rehabilitation technology. The **Assistive Technology Alternative Financing Program** assists people with disabilities to source private financing for products and services including hearing aids, computers, vehicle modifications and vision aids – but could include other devices, depending upon disability limitation, needs and goals.

6.3.5 Key Lessons

- Purpose of the FAFSA – similar to FSD, to provide support that would enable students (including those with a disability) to participate in higher education, however FAFSA is not focused solely on students with a disability and is open to all students. This centralised government funding is available to full and part-time students. There are also independent grant schemes for which students may apply independently. Whilst HEIs are required to provide standard RAs, students are individually responsible for ensuring that they are eligible for funding, and for seeking out the range of funding opportunities for RAs within individual HEIs, before they accept an offer.
- Categories of disability eligible for support – based on the data available, FAFSA supports a more limited range of categories of disability
- Timescales – similar to the FSD there is a set timeframe for applications to be submitted (January – June and the college must have the completed information by the last day of enrolment)
- Allocation model – financial support is provided via the institution or college in the first instance to pay for, e.g. tuition, fees and room and any remaining aid is then paid to the student for other expenses.

6.4 Australia - Disability Support Program (DSP)

6.4.1 Purpose of the DSP

The DSP was established in 2004 with the objective of increasing access to higher education for students with disability. The program has three elements:

- Additional Support for Students with Disabilities (ASSD);
- Performance-based Disability Support Funding; and
- The Australian Disability Clearinghouse on Education and Training (ADCET).

The objectives of the ASSD component of the Higher Education Disability Support Program are to:

- Provide funding support to eligible higher education providers to assist with high costs incurred in providing educational support and/or equipment to domestic students with disability with high cost needs; and
- Encourage efficient and effective use of equipment and resources to support students with disability⁴⁸.

Funding is provided by the Australian Government and eligible higher education providers are able to access funding annually through an application process which requires providers to complete a claim form available from the Department of Education and Training.

The 2015 evaluation found that 85% of the funds available under the DSP were accessed by higher education providers via the ASSD component of the program which provides funding support to eligible higher education providers to assist with high costs incurred in providing educational support and/or equipment to domestic students with disability with high cost needs.⁴⁹

6.4.2 Scale of Funding and Number of Students Supported

In 2014, \$7m Australian dollars was available under the DSP to reimburse higher education providers for expenses incurred in 2013. Of this, \$1 million (14%) was set aside for the performance-based component of the program and \$74,911 (1%) was provided to ADCET. Of the remaining funds available under the ASSD, \$418,965 (6%) was provided for equipment and \$5,538,126 (79%) was provided for educational support.⁵⁰

The total grants amount available for the Higher Education Disability Support Program (DSP) in 2017 will be \$7,389,480 (the "2017 DSP Grants Total"). The total amount available under the Higher Education DSP in any subsequent year will be calculated by indexing the 2017 DSP Grants Total in accordance with Part 5-6 of the Higher Education Support Act 2003.⁵¹

48 Commonwealth of Australia, Higher Education Support Act 2003 - Other Grants Guidelines (Education) 2012 (DIISRTE).

49 KPMG (2015) Department of Education and Training - Evaluation of Disability Support Program.

50 KPMG (2015) Department of Education and Training - Evaluation of Disability Support Program.

51 Australian Government (October 2016) Disability Support Program - Consultation following program evaluation.

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

More than 6,000 domestic students with disability accessed equipment and educational support funded by the DSP in calendar year 2014.⁵² Therefore spend per student in 2014 was approximately \$1,172.⁵³

6.4.3 Implementation of the DSP

Eligibility

There are approximately 38 Table A⁵⁴ higher education providers currently eligible to access DSP funding totalling approximately \$7 million per annum.

Eligible universities can provide support to any domestic student that gives satisfactory evidence of disability in accordance with the higher education provider's usual processes.

Categories of disability that are eligible for support are:

- Autistic Spectrum Disorder (including Asperger's syndrome)
- Attention Deficit Disorder/Attention Deficit Hyperactivity Disorder
- Blind/Vision Impaired
- Deaf/Hard of Hearing
- Mental Health Condition (including, but not exclusive to, the following: Bipolar Disorder, Schizophrenia, Clinical Depressive Conditions, Severe Anxiety, Severe Phobias, OCD, Severe Eating Disorders and Psychosis)
- Neurological Condition (including Brain Injury, Epilepsy, Speech & Language Disabilities)
- Significant Ongoing Illness
- Physical/mobility
- Developmental Co-ordination Disorder
- (Dyspraxia/Dysgraphia)
- Specific Learning Difficulties (Dyslexia or Dyscalculia)
- General Learning Difficulty (Including Intellectual Difficulty and Learning Difficulties resulting from an Acquired Brain Injury)

The evidence required is dependent on what each higher education provider requires.

52 Information provided to PACEC by Department of Higher Education (September 2016).

53 \$7,032,003/6000.

54 Table A providers are self-accrediting bodies, eligible for all funding under Section 16.15 of the Higher Education Support Act 2003.

Support Available

The type of support available and eligible and ineligible expenditure is:

- Educational support for disabled students. The type of educational support provided to students is determined by the higher education provider. Educational support must directly assist students with disability in relation to their studies. Examples may include:
 - ▶ Sign-language interpreters;
 - ▶ Production of Braille formats of course materials and lecture notes;
 - ▶ Production of non-Braille alternative formats of course materials and lecture notes, including transcription and adaptation of material for use with screen-reading technology, scanning, enlarged print and audio taping;
 - ▶ Tutorial support (additional tutoring);
 - ▶ Note taker and scribe support; and/or examination and assessment assistance, including the costs involved in assessment at a separate location with extra invigilators.
- Equipment. The type of equipment provided for students is determined by the higher education provider. Equipment must directly assist students with disability in relation to their studies. Examples of eligible equipment include:
 - ▶ Adaptive software and/or multiple-user license costs for adaptive software;
 - ▶ Adaptive computer equipment peripherals (e.g. large monitors, adaptive keyboards);
 - ▶ Mobility aids for shared use (e.g. scooters);
 - ▶ Adjustments or modifications to furniture or work stations (not including the purchase of standard ergonomic furniture); and/or;
 - ▶ Specialist tape-recording equipment and digital voice-recording devices.

Funding must not be spent on:

- Infrastructure, which includes all buildings, fixtures, roads, pathways and modifications thereof and generic facilities and services that are integral to the provision of education for all students; and
- The provision of personal care for students with a disability, which includes assistance provided by a paid or unpaid carer to ensure that basic activities of daily living and self-care, such as eating, dressing, toileting and mobilising, are accomplished. The provision of personal care also includes providing assistance with medications and treatments.⁵⁵

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

Processes and Timescales for Accessing Funding

Eligible higher education providers are able to access funding annually through an application process which requires providers to complete a claim form to the DSP based on a needs assessment carried out by the higher education institution.

Higher education providers are sent updated claim forms between February and March, which are completed and returned to the Department by the end of July.⁵⁶

Higher education institutions are required to send claim forms for grants on an annual basis.

Findings from 2015 Evaluation of DSP

The 2015 evaluation⁵⁷ of the DSP found that:

- The DSP is supporting higher education providers to meet student needs in areas that are of particular concern to students - completing course assignments and exams and fully participating in lectures and tutorials.
- The DSP contributes to facilitating access to supports and equipment for students with a disability.
- Higher education providers are using ASSD funding to provide a range of equipment and educational supports to remove barriers and facilitate access and participation.
- The DSP contributes to minimising or removing barriers for students with a disability to participate in higher education and has contributed to students with a disability being effectively supported in higher education throughout their studies. While students do not have a high level of awareness of the DSP, they are generally positive about their experience at university and the support they receive.
- DSP funding could be better utilised to improve higher education providers' capacity and resources to attract and retain students with a disability.
- The DSP contributes to building higher education providers' awareness of and access to contemporary research and practice materials relating to inclusive teaching and learning practices and support for students with a disability. This has primarily occurred via funding for ADCET.

56 KPMG (2015) Department of Education and Training: Evaluation of Disability Support Program.

57 KPMG (2015) Department of Education and Training - Evaluation of Disability Support Program.

6.4.4 Key Lessons

- Purpose of the DSP– similar to FSD, to provide funding to higher education institutions to support students with disabilities
- Scale of funding – the funding provided per student is on a par with that provided by the FSD (\$1,172 per capita (DSP 2014) (equivalent to approx. €817 per capita) compared to €866 per capita⁵⁸ (FSD 2013/14)).
- Timescales – similar to the FSD the DSP have set timeframes for submission of applications (5 month timeframe) though these are in advance of the academic year.
- Allocation model – in both instances (DSP and FSD), the funding is provided to the higher education provider to support the student

6 BENCHMARKING – INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN OTHER JURISDICTIONS (CONTINUED)

6.5 Summary of Key Lessons

The following table provides an overview of the key lessons identified from the benchmarking of the FSD with other similar interventions.

Table 6:3: Overview of key lessons

Benchmark	Key Lessons
UK – Disabled Student Allowance (DSA) scheme	<ul style="list-style-type: none"> ■ Purpose of the DSA – similar to FSD, to provide support to students with disabilities in higher education who cannot enrol or obtain higher education without support ■ Categories of student eligible for support: the DSA supports part-time students ■ Timescales: the DSA operates a rolling application process whereby students can submit an application in the nine months after the start of their academic year which differs from the much shorter timescales operated by the FSD (focused on the first quarter of the academic year) ■ Funding/allocation model: UK is moving towards a more UDL model with much more reduced 'targeted' funding for students under the equivalent of their FSD ■ Proportion of students in receipt of DSA on full-time first degree courses in 2014/15 was 7.0%. For part-time undergraduate students, 3.4% in receipt of DSA⁵⁹
USA - Free Application for Federal Student Aid (FAFSA)	<ul style="list-style-type: none"> ■ Purpose of the FAFSA – broader than FSD, to provide support that would enable students (including those with a disability) to participate in higher education. FAFSA is not focused solely on students with a disability and is open to all students ■ Categories of disability eligible for support – based on the data available, FAFSA supports a more limited range of categories of disability ■ Timescales – similar to the FSD there is a set timeframe for applications to be submitted (January – June and the college must have completed the information by the last day of enrolment) ■ Allocation model – financial support is provided via the institution or college in the first instance to pay for, e.g. tuition, fees and room and any remaining aid is then paid to the student for other expenses ■ Percentage of first-time, full-time degree/certificate-seeking undergraduate students at 4-year degree-granting postsecondary institutions receiving any financial aid was 85% in 2013–14 (however this intervention is open to all students including those with a disability)
Australia - Disability Support Program (DSP)	<ul style="list-style-type: none"> ■ Purpose of the DSP– similar to FSD, to provide funding to higher education institutions to support students with disabilities ■ Timescales – similar to the FSD the DSP have set timeframes for submission of applications (5 month timeframe) though these are in advance of the academic year ■ Allocation model – in both instances (DSP and FSD), the funding is provided to the higher education provider to support the student ■ 51,568 students were supported via the DSP in 2015⁶⁰ which is equivalent to 3.7% of the 1,410,133 domestic and international students enrolled at higher education institutions in 2015⁶¹

⁵⁹ <https://www.hesa.ac.uk/data-and-analysis/performance-indicators/summary/2014-15>.

⁶⁰ https://docs.education.gov.au/system/files/doc/other/2016_dsp_consultation_paper.pdf.

⁶¹ Percentage calculated based on: 51,568 students that received support from the DSP in 2015 (Australian Government (2016) Disability Support Program: Consultation following program evaluation) as a percentage of the total number of students enrolled in higher education in 2015 (Australian Government (2016) 2015 Student summary).



Benchmarking - Interventions to support Students with Disabilities in Ireland



7 Benchmarking - Interventions to support Students with Disabilities in Ireland

7.1 Introduction

This section examines a number of other interventions/supports that exist for students with disabilities in education and considers the potential for harmonisation across these and the FSD. The schemes/interventions considered include:

- **DARE (Disability Access Route to Education)⁶²** which has been developed by the Irish Universities Association (IUA) with the overall aim of widening access and participation in higher education for school-leavers with a disability. DARE offers reduced points places to school leavers who as a result of having a disability have experienced educational challenges in second level education⁶³.
- A number of other schemes/supports for students with a disability at primary, secondary or third level institutions which seek to enable them to participate fully in the educational system:
 - ▶ The **National Council for Special Education (NCSE)** provides supports to schools to meet special education needs. Through its network of local Special Educational Needs Organisers, it is responsible for allocating resource hours and special needs assistants to support children with special needs.
 - ▶ The **State Examinations Commission (SEC)** is responsible for the provision of reasonable accommodations for candidates who, because of a temporary, permanent or long-term disability, have special assessment needs in examinations.
 - ▶ The **National Educational Psychological Service (NEPS)** employs psychologists who specialise in working with the school community. They work in partnership with teachers, parents and children in identifying educational needs. They offer a range of services aimed at meeting these needs, for example, supporting individual students (through consultation and assessment), special projects and research.⁶⁴ The psychologists employed by NEPS are located in eight regions throughout the country. They work directly with a number of schools⁶⁵.

62 18 colleges participate in DARE (1,558 admissions).

63 Access College: 2016 Application Guide for DARE (Disability Access Route to Education).

64 <http://www.education.ie/en/Schools-Colleges/Services/National-Educational-Psychological-Service-NEPS-/NEPS-Home-Page.html> (accessed July 2016).

65 http://www.citizensinformation.ie/en/education/primary_and_post_primary_education/educational_supports/national_educational_psychological_service.html (accessed August 2016).

7 BENCHMARKING - INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN IRELAND (CONTINUED)

7.2 DARE

7.2.1 Purpose of the DARE

DARE was developed by the Irish Universities Association (IUA) with the overall aim of widening access and participation in higher education for school-leavers with a disability. DARE offers reduced points places to school leavers (post primary) who as a result of having a disability have experienced educational challenges in second level education.⁶⁶ Further detail provided in Appendix I – Part 2.

7.2.2 Implementation of DARE

Eligibility

The DARE scheme requires evidence of a verifiable disability and changes were made to the 2016 Application Cycle to broaden the avenues available to students to provide evidence of their disabilities so that it is easier and more affordable to do so.⁶⁷ Starting with the 2016 cycle, students are also asked to provide evidence that their disability has had a negative impact on their second level education. Categories of disabilities eligible to apply for DARE are outlined in Appendix I – Part 2.

DARE requires the submission of medical evidence in the form of a report or letter from a medical professional/practitioner for each disability category. For 2016 applications, DARE guidelines specify that reports must be less than three years old for some disabilities (FSD guidelines specify report of five years or less or places no age limit) and from 2016 DARE also accepts a completed Evidence of Disability Form instead of an existing report, except in the case of specific learning difficulties which require a full psycho educational assessment completed by a psychologist.

Support Available

Rather than providing specific supports, DARE offer reduced points places to school leavers (post primary) with the overall aim of widening access and participation in higher education for school-leavers.

Processes and Timescales

The process to apply to DARE is outlined in Appendix I – Part 2. The timescales for an application to DARE both take seven months in total. The process begins in February when the student applies to the CAO and ends in August when the CAO offers for reduced points' places are made to successful DARE applicants. Full details of the application timescales are in Appendix I – Part 2.

⁶⁶ Access College: 2016 Application Guide for DARE (Disability Access Route to Education).

⁶⁷ For example, for 2017 entry a full psychological assessment report of any age can be provided as evidence of Specific Learning Difficulties (Dyslexia or Dyscalculia).

7.3 National Council for Special Education (NCSE)

7.3.1 Purpose of the NCSE

The National Council for Special Education (NCSE) provides supports to schools to meet special education needs. Through its network of local Special Educational Needs Organisers, it is responsible for allocating resource hours and special needs assistants to support children with special needs in primary, post primary and special schools.

7.3.2 Implementation of NCSE Support

Eligibility

Students with physical and learning disabilities are eligible for support by the NCSE which does not specify categories of disability and therefore their evidence requirements are the same for each type of disability supported, however the evidence focuses on what support is needed and why in the school setting rather than the condition of the student alone.

Support Available

The NSCE provides the following support for schools⁶⁸:

- Low Incidence Teaching Hours (LITH) Support and/or Access to Special Needs Assistants (SNA) Support;
- School Transport; and
- Assistive Technology.

Processes and Timescales

Schools submit applications for Low Incidence Teaching Hours (LITH) support, Special Needs Assistant Support (SNA) support, and Resource Teaching (RT) hours for students with Down syndrome to their local SENO using NCSE Form 1 or NCSE Form 8 as appropriate.⁶⁹

The process runs from January (when schools should submit the Confirmation of Leavers form/ NCSE Form 5 to their SENO) to June (when SNA allocations are published on the NCSE website) and in September schools confirm to their local SENOs that students allocated additional supports are attending school using the Student Attendance Confirmation Form, NCSE Form 6.⁷⁰

68 <http://ncse.ie/for-schools> (accessed August 2016).

69 NCSE (2016) Submission of Applications for Low Incidence Teaching Hours (LITH), Access to Special Needs Assistant Support (SNA), applications for Resource Teaching (RT) Hours for Students with Down syndrome & Notification of Leavers for the 2016/17 School Year.

70 NCSE Guidelines for Schools 2016-17.

7 BENCHMARKING - INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN IRELAND (CONTINUED)

7.4 State Examinations Commission (SEC)

7.4.1 Purpose of the SEC

The SEC is responsible for the provision of reasonable accommodations for candidates who, because of a temporary, permanent or long-term disability, have special assessment needs in examinations. Students apply for reasonable accommodations through their school or education provider.

7.4.2 Implementation of SEC support

Eligibility

Students with physical and learning disabilities are eligible for support by the SEC; SEC does not specify categories of disability and therefore their evidence requirements are the same for each type of disability supported. However SEC have criteria for specific types of accommodations rather than disability type. In addition SEC evidence focuses on what support is needed and why in the school setting rather than based on the condition of the student alone.

Support Available

The SEC can provide a range reasonable accommodations, including:

- Exemptions from examination components (a candidate's special need may be such that it is not possible for him or her to participate in a particular mode of assessment. For example, the aural element of certain examinations may not be appropriate for a candidate with severe hearing impairment);
- Written examinations accommodations (e.g. arrangements to have question papers read to the candidate);
- Oral and aural examinations accommodations (e.g. The candidate may remain in the main centre but sit close to the tape recorder)

Processes and Timescales

A closing date is specified for the submission of applications (Leaving Cert – for 2015/16 May 2015, Junior Cert – for 2015/16: Nov 2015), however applications are received and processed up to and during the examination period.⁷¹

Full details on the application process is provided in Appendix J – Part 2 however the process varies as follows:

- Junior certificate – the decision/assessment is devolved to local authority/school. The SEC provides a simple form for school to indicate the grounds for application for support to the SEC (e.g. sensory or specific leaning difficulty). The school decides if student meets the SEC criteria/that they have produced the required evidence to show that, e.g. they need a reader (SEC provides guidance on what evidence is required).
- Leaving certificate – centralised model where the school sends evidence to SEC (test scores or evidence from a professional for students with mental illness etc.). The SEC works in conjunction with the school to gauge how the student’s disability will impact their ability to perform.

7.5 National Educational Psychological Service (NEPS)

7.5.1 Purpose of NEPS

The National Educational Psychological Service (NEPS) employs psychologists who specialise in working with the school community (primary, post primary and special schools). They work in partnership with teachers, parents and children in identifying educational needs. They offer a range of services aimed at meeting these needs, for example, supporting individual students (through consultation and assessment), special projects and research.⁷²

7.5.2 Implementation of Support from NEPS

Eligibility

Students with physical and learning disabilities are eligible for support by NEPS who do not specify categories of disability; evidence requirements are the same for each type of disability supported. Whilst NEPS require educational assessments there is no time limit attached to these.

Support Available

The psychologists employed by NEPS are located in eight regions throughout the country. They work directly with a number of schools and their work includes⁷³:

- Engaging in individual casework with children and young people
- Providing a consultation service for teachers and parents
- Participating in school-based projects relevant to educational psychology
- Promoting mental health in schools

72 <http://www.education.ie/en/Schools-Colleges/Services/National-Educational-Psychological-Service-NEPS-/NEPS-Home-Page.html> (accessed July 2016).

73 http://www.citizensinformation.ie/en/education/primary_and_post_primary_education/educational_supports/national_educational_psychological_service.html (accessed August 2016).

7 BENCHMARKING - INTERVENTIONS TO SUPPORT STUDENTS WITH DISABILITIES IN IRELAND (CONTINUED)

Support provided in schools includes:

- Low Incidence Teaching Hours (LITH) Support and/or Access to Special Needs Assistants (SNA) Support;
- School Transport; and
- Assistive Technology.

Processes for Accessing Funding

Children are referred to NEPs through the school principal using the following process⁷⁴:

- Consultation between principal and parent to discuss any difficulties experienced by the pupil.
- Following consultation with the school principal, he/she may feel the child needs a psychological assessment by NEPS or the parent may request an assessment to be completed. In this case the purpose of the assessment is to assess IQ and therefore learning disability.
- The school principal will contact NEPS to request a psychological assessment for the child after the appropriate referral form has been signed to provide parental consent.

After the assessment is completed:

- Parent(s) will meet with the educational psychologist and get an opportunity to discuss the assessment.
- The psychologist will explain their findings' at this point.
- Parent(s) will also receive a copy of the assessment report.

If the assessor recommends an application for extra resources or a referral to the clinical services, the parent(s) will then be asked to sign a further consent form.

7.6 Scope for Harmonisation

While there are a number of differences between the guidelines reviewed, there is scope for greater harmonisation in relation to:

- Evidence requirements/processes to provide this: given that there are similarities in the evidence required for from young people with a disability there is the potential for a more streamlined process to avoid duplication of effort, time or financial cost.
- Continuum of education approach: as there are some similarities in the support provided by the different schemes there is the potential for a continuum of support to be provided from primary/secondary education to third level.

74

<http://www.specialneedsparents.ie/the-facts/education/educational-assessments#V6i3VGf2YdU> (accessed Aug 2016).

The above could be supported by the development of a Disability Passport setting out assessment of need, statement of disability/ability, etc. and accommodations required which could then 'travel' with the young person through their educational journey.

However there are also some specific issues to consider in moving towards harmonisation:

- There may be time limits on reports associated with some evidence of need as these may reflect student needs at a point in time.
- A needs assessment should reflect pupil/student context. This likely to change as the pupil/student progresses through education system given the potential for students being likely to seek increasing independence moving from second level to third level education and different needs arising in a different education context.
- Variation in timescales/deadlines associated with applying for different supports and how this ties in to academic years and planning both for students and institutions.

Conclusions and Recommendations



8 Conclusions and Recommendations

8.1 Introduction

This section sets out the conclusions (Sections 8.2 – 8.5) and recommendations (Section 8.6) for the review. These are grouped by the four main strands set out in the terms of reference for the review.

8.2 Strand 1: HEA Model and Guidelines

8.2.1 HEA Model for FSD

- The process of applying for and managing the FSD is resource intensive for HEIs and for HEA; this ties up some resource in HEIs which could otherwise be used to support students/develop services
- The timescales associated with requesting funding are challenging for HEIs:
 - ▶ Assessment of students' needs takes place at an already busy time in the academic year;
 - ▶ There is a high volume of students' needs to be assessed at a single point in time;
 - ▶ Supporting evidence: it can be difficult to get psychological assessments completed in time and it was suggested that some should be able to be submitted as "pending";
 - ▶ Students' needs may not be fully known when are being assessed (most relevant for those in first year);
 - ▶ There is a tight turnaround between assessing student needs and submitting a summary request form to the HEA;
 - ▶ HEIs are not notified of their allocation until February each year; this causes difficulties in purchasing etc;
 - ▶ For FEIs in particular, the FEI courses are typically only one academic year – this means that by the time the fund comes through the course is half way through and students are without support for most of the year (and some may drop out before reaching this point).
- As above, the allocation timescales also bring challenges for HEIs as regards the ability to plan services and use funds efficiently.
- Due to increasing demand for support from the FSD and the total level of funding having remained broadly the same in recent years, there is a perception that FSD is oversubscribed with some institutions submitting as many applications as possible in order to seek to secure a minimum level of funding.
 - ▶ Feedback from the staff survey further highlighted the impact of Institutions receiving less funding than they applied for. The main impacts were that students receive less support than they require (76%) and that institutions are not able to offer the necessary level of support students (60%). Respondents also stated that they can no longer offer supports that were previously in place (32%) and there has been an increased demand on organisation finance (32%).

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

- Staff found metrics used to allocate funding to be difficult or very difficult to understand.
- Consultees expressed support for the view that the focus of FSD should be on students with high needs rather than supporting what HEIs ought to be doing through Access funding etc. (that should provide minimum level of disability services/infrastructure).
- Staff felt current monitoring/reporting processes were too time consuming and it was suggested that bi-annual reporting would be more appropriate.
- Consultees suggested that those 'without a label' (i.e. undiagnosed) may require more support (as those with a 'label' had accessed support before, while those without a diagnosis have not). Therefore, it was suggested that there should be an option where students are not turned away because of lack of evidence or 'label'. Overall greater flexibility/discretion at individual institution level would assist with this.
- There was felt to be scope to improve scrutiny/accountability by HEA in how FSD is used. (A comparison with the Erasmus scheme: every university has to report on how the money has been spent and every student reports on their period spent abroad. There is a separate monitoring exercise each year – over seven years they visit every college at least once to find out what they are doing and what could be improved through meeting people that are in regular contact with students with disabilities).
- A suggestion was made that follow up with individual students would be useful to establish impact of FSD.

A number of other schemes in other jurisdictions which support students with a disability to enter and remain in higher education have been considered as part of the review. Whilst the schemes share many similar features with the FSD (in general supporting similar types of disability and types of support), there are also some differences:

- Each of the schemes has different thresholds and maximum allowances for different types of support.
- Allocation timeframes are earlier for students.
- Monitoring information is typically collected annually.
- Other points to note: UK DSA guidance provides specific detail on what can and cannot be funded.

See Recommendations 1 to 5.

8.2.2 HEA Guidelines for FSD – Improvements

There are four sets of HEA guidance according to type and location of institution applying to the FSD. Whilst these share many common features, there are some differences. In moving to a new model for FSD, it will be important to amend and update each of these to reflect the new model and recommendations relating to scope of the FSD.

Feedback from consultation identified issues with the support from the FSD for some categories of disability. The most commonly mentioned categories of disability across the strands of consultation included Specific Learning Disabilities and Mental Health conditions. The issues include: an increasing trend in the numbers of students affected by these conditions, lack of awareness/understanding that the FSD provides support for students with these conditions; and that providing evidence required by the FSD in respect of these conditions can be difficult.

Therefore, it is important that the guidelines clearly reflect the categories of disability that are supported by the FSD and provide clear and relevant guidance on acceptable/appropriate evidence (tailored to the category of disability).

See Recommendation 6.

8.2.3 HEA Guidelines for FSD – Scope for Harmonisation

Across all of the guidelines reviewed as part of this study (see Section 7), whilst there are differences (regarding assessment processes, timescales, target group (primary, secondary or third level (some or all institutions))), it is clear that there is potential for harmonisation given that there are similarities in much of the evidence required and eligibility criteria (to access these supports/interventions) and the categories of disability supported. However there are some broader issues to consider in moving towards harmonisation:

- There may be time limits on reports associated with some evidence of need as these may reflect student needs at a point in time.
- A needs assessment should reflect pupil/student context as the pupil/student progresses through education system and different needs arising in a different education contexts.
- Variation in timescales/deadlines associated with applying for different supports.

See Recommendation 7.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

8.2.4 Scope of the FSD

8.2.4.1 Students in Further Education

The FSD currently supports students in FEIs/ETBs⁷⁵ in Ireland; the list of approved PLC courses is available from Education and Training Boards (ETBs) or SOLAS. The FSD funding supports around 1,350 students (13.4% of all those supported by FSD) and more than one fifth (22.8%) of FSD funding (funding allocated 2015 included €2.4m to Irish FEI's).

This is something of an anomaly given that there is a lack of policy fit between the HEA and the FE sector and no existing relationships between HEA and FE sector in any other area. In contrast, there is an existing governance framework, financial memorandum, annual budget meetings and performance meetings between HEA and the HEIs in place. Further the systems and structures and resourcing differ between the FE and HE sectors.

However, given the HEA track record in supporting the FE sector in this area and the positive feedback from the sector on the role of the HEA in this regard, this is felt to be an area to be continued, with an appropriate framework in place for the transfer of the FE element to SOLAS.

See Recommendation 8.

8.2.4.2 Students in NI or other EU countries

The FSD currently supports Irish students with disabilities who enrol in institutions outside Ireland:

- Irish students enrolled in Northern Ireland (NI) institutions⁷⁶;
- Irish students enrolled in European Union (EU) institutions⁷⁷.

To put this in context, this element of FSD funding is relatively small: it supports around 176 students (1.8% of all supported by FSD per annum) and 3.3% of FSD funding (funding allocated 2015 included €364k to UK institutions).

Whilst there is an argument that the FSD should not support Irish students studying in NI or in other EU countries, given that other countries do not provide specific support for their students with disabilities who enrol in Irish institutions and the onus is placed on the host Irish institution to support these students through mainstream Access funding, there are also arguments in favour of the FSD continuing to support these categories given:

- Equality legislation provides a strong basis for support to be provided for example the protections afforded to students with disabilities under The Equal Status Acts 2000-2011. For the purposes of the Equal Status Acts, Higher Education Institutions are service providers and

⁷⁵ Guidelines for Further Education Colleges for Academic year 2015-16.

⁷⁶ Guidelines for institutions in Northern Ireland 2015-16.

⁷⁷ Guidelines for institutions in EU countries other than Ireland 2015-16.

are prohibited from discriminating against any person seeking to access a course⁷⁸, benefit or facility on the grounds of disability or any of the eight other discriminatory grounds.

- Support for these categories is consistent with SUSI (Student Universal Support Ireland) which provides student grants⁷⁹ for students studying outside the state on approved institutions/courses.

See Recommendation 9.

8.2.4.3 Part-Time Students

The FSD does not currently support part-time students with disabilities who enrol in Irish institutions. According to AHEAD data⁸⁰, there are approximately 440 part-time students with a disability in HEIs in 2015 (represents about 1% of the total population of students with disabilities, around 10,333 according to AHEAD data).

Whilst there is an argument that the FSD should not support part-time students with a disability, given that these are not eligible⁸¹ for mainstream supports such as student grant support, there are greater arguments in favour of the FSD supporting part-time students including:

- Equality legislation provides a strong basis for support to be provided (details in Section 3.4).
- People with disabilities more likely to study part-time – due to their disabilities they may have to opt for part-time study A recent report produced by AHEAD and DAWN⁸² noted that “part-time students are significantly disadvantaged in their access to supports”.
- Considering lessons from benchmarking, the UK/DSA funds part-time undergraduate students. (The 2016/17 guidance states that⁸³ there are four allowances for students undertaking part-time courses. These mirror those available to full-time students, but have different maximum amounts – typically calculated on a pro rata basis to the full-time rates, based on the actual intensity of study).
- Feedback from the staff survey in HEIs/FELs and the site visits to HEIs/FELs demonstrated some support for including part-time students in FSD in many cases recognising that due to disabilities, students may be unable to study full-time and it may only be practical to attend on a part-time basis.

See Recommendation 10.

78 Any course provided by the Institution, whether full-time or part-time.

79 <https://susi.ie/eligibility/student-studying-outside-the-state/>.

80 Numbers of Students with Disabilities Studying in Higher Education in Ireland 2014/15 (AHEAD, January 2016) Available at: <https://www.ahead.ie/userfiles/files/shop/free/ParticipationRatesReport2014-15.pdf>.

81 <https://susi.ie/eligibility/undergraduate-student/approved-institutionscourses-for-undergraduate-students/>.

82 AHEAD, DAWN (2016) A Review of Reasonable Accommodations for Students with Disabilities in Higher Education in Ireland.

83 [dsa-guidance-document-for-new-dsa-students-in-ay-2016-17-version-12-september-2016](https://www.ahead.ie/userfiles/files/shop/free/dsa-guidance-document-for-new-dsa-students-in-ay-2016-17-version-12-september-2016).

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

8.2.4.4 International Students

The FSD currently does not currently support non EU students with disabilities who enrol in Irish institutions. There are approximately 173,000 full-time students in Irish HEIs in of which 155,000 are domiciled in Ireland and 18,000 international⁸⁴. Assuming that the proportion of students with disabilities is similar to the level quoted by AHEAD (i.e. approx. 5-6%), this gives somewhere between 900 and 1,080 of the international students having a disability. This is equivalent to about 10% of the total number currently supported by the FSD and therefore not an insignificant number of students/scale of funding.

There is a case that the FSD should support international students with a disability, given that:

- Equality legislation provides a strong basis for support to be provided (details in Section 3.4);
- Other countries do not provide specific support for their students (with disabilities) enrolling in Irish HEIs;
- There is an onus on the host institution to support these through Access funding;
- Feedback from the staff survey – in which respondents were asked about the appropriateness of eligibility and targeting criteria for the FSD – the nationality, residency and immigration criteria (which follow SUSI) were viewed as not appropriate by the largest proportion of respondents (37.0%) – five of these thought that the nationality criteria should be reviewed to include international and Erasmus students (though in fact these can be supported through Erasmus Funding).

However, there is a greater case for FSD not extending support international students due to the fees that these students pay and therefore the requirement for the International Office (or equivalent) in HEIs to provide them with the support they require.

A recent report produced by AHEAD and DAWN⁸⁵ discusses experience elsewhere which typically funds support for international students with disabilities but generally not from domestic tailor made funds to support local students. The international experiences includes:

- the broad range of funding models for international students which exist in the UK. International students do not have a statutory funding equivalent to the DSA, and currently, HEIs fund support that are required to meet the obligations of the Equality Act 2010. Some HEIs have specific funds to support international students with disabilities; others cover costs (through own funding) equivalent to the level that would be provided by the DSA; some regional funds provide support; some HEIs in Scotland provide own funding should the students not be able to access support from elsewhere.

84 http://www.icosir.ie/eng/student_information/student_statistics.html.

85 AHEAD, DAWN (2016) A Review of Reasonable Accommodations for Students with Disabilities in Higher Education in Ireland.

- Outside of the EU, individual HEIs have specific policies for visiting or exchange students.
 - ▶ In Canada, international students with a disability must meet the same eligibility criteria as Canadian students, and will be provided with the same supports and services as local students, provided certain conditions are met.
 - ▶ In Australia, an Ombudsman is available. This is a free and impartial service which investigates complaints within public and private HEIs, where RAs have not been implemented so that visiting students with disabilities may fully access their course.
- Both incoming and outgoing ERASMUS and visiting students experience disparate levels of support which are dependent upon the resources of the exchange HEI, and country specific approaches to supporting students with disabilities.

In summary, therefore current practice in relation to non EU students should remain unchanged, i.e. the FSD should not be extended to support non EU students enrolling in Irish HEIs.

8.3 Strand 2: Financial Provision of the Fund

The FSD currently supports around 10,000 students per annum (this has increased substantially from around 3,500 in 2007). Whilst the number of students has increased significantly, the level of funding has remained broadly the same. On a per capita per annum basis, this equates to a reduction of close to one third in **funding allocation per student per annum from €2,943 in 2007 to €1,025 in 2015.**

Considering students with disabilities who enter and leave HE each year, there are currently around 3,000 new entrants and around 3,000 leavers to HE (students with disabilities).

There is, however, an increase in the number of students with disabilities which is influenced by a variety of factors including:

- Increasing demand, particularly amongst students with mental health needs and those with an intellectual disability (e.g. those on the autistic spectrum)
- Increasing “pipeline” from second level education – due to greater support already provided in primary and second level education
- Students and families more open to acknowledging a disability
- Vocational training demanded by employers
- Greater awareness of accommodations available.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

An estimate of the increase in numbers of students with disabilities has been produced, based on:

- Growth in new entrants in line with year on year trends (CAO data);
- New categories eligible for funding arising from recommendations in this report

This yields an additional – close to 800 – number students per annum with a resource requirement of around €580K per annum (assuming the per capita per annum level of funding as current). Alternatively, if the level of funding remains unchanged (with the same increase in the number of students per annum), the per capita per annum level of funding will reduce. Institutions will face further challenges in addressing growing demands for support.

The National Plan for Equity of Access to HE 2015-19 includes targets for increased participation in higher education by people with disabilities. To achieve the targets in the National Access Plan would require a gradual increase in the total proportion of students with disabilities (new entrants) from 6% to 8% by approximately 1,000 per annum assuming all other variables unchanged. The estimates above demonstrate that there is considerable movement towards the target set out in the National Access Plan.

See Recommendation 11.

8.4 Strand 3: Educational Institutions and the Fund

The FSD is not the only mechanism by which students with disabilities are supported in third level education. Respondents to the staff survey provided details of a wide variety of means by which their institutions supported students with disabilities (other than through the FSD) based on internal resources. These included some supports targeted specifically at students with disabilities (for example: measures to enhance accessibility of buildings (88.4%); Disability service with dedicated disability support staff (75.0%); Tailored induction programmes (68.3%); and Non-standard admissions procedures (62.8%)). Other supports that were more inclusive in nature were also mentioned. These included: Inclusive learning (90.9%), Universal design (81.1%), Mainstreaming of services (80.0%).

Some institutions also draw on external providers to support students with disabilities. These included:

- Support from external organisations (other than HEA) to support students with disabilities: less than half (45.8%) of respondents to the staff survey reported that their institutions access external resources from organisations other than HEA. These include: AHEAD, DARE, Dyslexia Association, National Learning Network, the National Council for the Blind, Student Finance and Deaf Hear.
- External resources from other educational institutions: Just over a quarter of respondents' institutions (27.7%) access external resources from other educational institutions.

- Regional collaboration: Around one third of respondents' institutions (34.8%) take part in regional collaboration to provide services/supports to students with disabilities.

There is evidence of good practice in supporting students with disabilities that could be shared amongst institutions. Respondents to the staff survey identified what they are doing well to support students with disabilities (maximising impact from existing resources) that other institutions could learn from. Examples included:

- Provision of Assistive Technologies and other accommodations
- Provision of learning support
- Needs assessments
- Tailored/personalised support
- Promoting inclusivity

Mainstreaming was also identified (by HEI/FEI staff consulted in site visits) as an approach that should be adopted for more supports as this would benefit a range of students and make these supports more easily accessible. One university has mainstreamed a number of supports for students with a disability and staff indicated that this allowed it to focus FSD funding on very specific supports. The supports provided include pre entry/Outreach Programme which includes an assistive technology outreach programme, educational supports, technological supports, personal supports, sports & leisure, occupational therapy programme, careers advice & employability skills and mentoring support programme.

This evidence supports the rationale for a move to a Universal Design approach– making best use of the core funding allocated to HEIs for mainstream supports that facilitate access which will benefit the wider student population as well as those with disabilities. This would then allow the FSD to focus on a more specific role targeting those most in need. **See Recommendation 4.**

The level of funding per institution varies considerably as does the approach and level of resources allocated to the management and delivery of FSD. In some instances, there are dedicated staff to manage and administer the FSD as well as staff to support assistive technology as well as disability advisors, financial administrators etc., though elsewhere staff have responsibility for FSD as one part of their role. According to the staff survey, the majority of respondents reported that their organisations employ staff dedicated to manage/administer the FSD (63.3%). The lack of consistency in approach/resource to manage and administer the Fund was mentioned by a minority of respondents as possibly impacting on the equality and equity of provision. There were calls from some consultees for the FSD to provide some allocation of funding for administration, and also for more consistency in the roles/levels of staff at each institution.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

Institutions reported challenges in managing cashflow associated with the FSD, given the tight timescales from assessment of student needs to allocation and payment of funding:

- some use the institution's own funds until FSD monies are provided and 'recoup' what was spent; some institutions' own funds may also be used to fill in any shortfall in FSD funding;
- others do not have the capacity to do this. If FSD funding is not forthcoming they have to prioritise thus providing only essential supports (such as Personal Assistants)) until such time as the funding becomes available.

Processing applications is a resource intensive process, though it is clear that the whole process is not as efficient and effective as it could be. There is evidence of the need for improvement in that there have been instances of underspend (despite the evidence of increasing need, insufficient funds being provided, etc.). The most common reasons for this include late allocation of funding and changing needs of students.

Respondents provided suggestions as to how this approach could be improved including: Earlier allocation/sanction of the Fund; Clarity/transparency over how funds are allocated; Longer allocation period; and Increase the focus on mainstreaming of supports.

To ensure that the FSD monies are used most efficiently, it is important that:

- HEIs are notified of their allocation at the earliest opportunity to overcome current issues regarding timing and approach to allocation which can lead to underspend/inefficiency;
- HEIs are notified of their allocation to allow them to plan ahead (currently difficult to do);
- There is recognition that student needs may change (particularly in first year); and
- There is scope to use funding that may have been allocated to a specific student – under the current model, if that student drops out, funding may be lost – whilst there may be another student whose needs were identified later in the year and for whom no funding is available.

Recommendations 1 to 10 (concerned with the transition to a new funding model) should help to support increased efficiency in the use of the FSD including consideration of links between the FSD and other supports to ensure these are complementary as well as looking beyond individual HEIs to share good practice with others.

Furthermore, existing fora may be used to share knowledge, ideas, good practice etc. on the FSD – for example AHEAD, DAWN, Teaching & Learning Forum. There are already some instances of good practice being shared for example: Guidelines for the Provision of Supports and Reasonable Accommodations to Students with Disabilities in Higher Education (AHEAD, DAWN, 2016). In the FE sector, in particular, there is a requirement for access to Disability Officers in all FE Colleges (recognising that resources are unlikely to support individual officers in each college but that other models/approaches should be considered). **See Recommendation 12.**

8.5 Strand 4: Student Experience of the Fund

Broadly speaking, students have a positive experience of the fund in terms of accessing support that meets their needs. However, there is scope for improvement regarding information, awareness, communication, etc.:

- There is mixed awareness supports for students with a disability and lower awareness of the FSD.
- A sizeable proportion of students (41% who responded to the student survey) felt there is not enough information available on the types of support available.
- Communication between disability support staff and teaching staff could be improved to ensure they are more fully aware of the needs of their students and how best to support these.
- There are mixed views on the process for accessing support; there is a lack of clarity on eligibility.
- Students have accessed a range of supports and reported that these met their needs.

Student feedback indicates that the FSD has had positive impacts on them in terms of **participation** (56% stating that the availability of support strongly influenced their progression to higher education) and **remaining in HE** (51% stating that the support provided influenced their decision to remain in higher education). Students also reported that they would have struggled with exams or would have become more isolated/less confident and that the support received helped them to become more independent.

From a student perspective, there is scope for improvement to the FSD. Respondents to the student survey suggested specific actions that institutions could adopt to support students with disabilities including:

- Increased communication between disability support services and lecturers;
- Awareness training for lecturers/teaching staff so they are better equipped to support students with a disability;
- More opportunities for peer support/group interactions for students to discuss how they manage their disability/what supports they have as well as social support;
- Orientation for students with a disability to promote the FSD and/or university disability support available;
- Promotion of supports available at higher education to students at secondary school;
- Learning support outside of class time/college hours; and
- Mainstreaming of services for disabled students.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

Many of these issues were also reflected in feedback from other consultees.

The perceived experience of the FSD amongst students, the evidence of impacts to date and the scope for improvement identified in consultation underpin. **See Recommendations 13 and 14.**

8.6 Recommendations

In light of the evidence above, **14 recommendations** have been proposed to develop and introduce a new model for allocating FSD funding by the HEA, reflecting on the scope for improvement identified as part of this review, ensuring buy-in from relevant stakeholders and building in a managed transition from current to new model. The recommendations address the following areas – reflecting the four main strands set out in the terms of reference for the review:

- **Strand 1:** New Funding Model, Guidelines and, Scope of the Fund
- **Strand 2:** Financial Provision of the Fund
- **Strand 3:** Educational Institutions and the Fund
- **Strand 4:** Student Experience of the Fund

8.6.1 Strand 1: HEA Model, Guidelines and Scope of Fund – New Funding Model

RECOMMENDATION 1

Establish an Implementation Group with a range of relevant and appropriate skills and experience to oversee the **design, development and implementation of a new model for allocating FSD funding**.

- Membership of the Implementation Group to include representatives of DES, HEA, DAWN (universities and IoTs), SOLAS, FE Sector (including ETBs), AHEAD, disability sector, students, teaching staff and learning support staff, etc. and a resource allocation expert.
- The Implementation Group should agree with the sector the **key principles for allocating FSD funding to underpin a new model** including for example:
 - ▶ Transparency/Consistency/Simplified/Efficient and Effective/Needs Based (underpinned by needs assessment)
 - ▶ Maintain the individual nature of reasonable accommodations
 - ▶ Greater flexibility for HEIs in how funding used to best support students
 - ▶ Greater ability to plan (early notification and greater certainty about level of funding)

- ▶ A driver of service development, i.e. FSD should be progressive, supporting greater independence
- ▶ Accountability (for HEA).
- The Implementation Group should consider the development of a funding model that takes account of the following:
 - ▶ HE sector: adopting a block grant allocation approach – ideally on a multi-annual funding basis – taking into consideration:
 - historical trends (e.g. numbers of students supported by FSD in the previous year or rolling average (by category of disability, by FT/PT (if support this)));
 - weighting by student needs (low, high) and by year (higher for first year (given that most retention issues arise then when needs being identified/emerging));
 - ▶ FE sector: a separate allocation process though following similar principles as HE.
- The Implementation Group will oversee the **development of a plan to manage the transition from the current to new allocation model**. This should incorporate moderation to minimise any adverse impact (where institutions may receive lower levels of funding under the new model) and consider options to phase in the new approach.

RECOMMENDATION 2

The **timescales for allocating funding and processing payments** under FSD should be revised in the new model such that:

- The majority of funding is allocated earlier in the financial year and in advance of the beginning of the academic year – for example in June;
- A small proportion of the fund (e.g. circa 5%) is held back by the HEA as contingency to deal with exceptional circumstances that arise during the year. This funding would be accessible by individual application during the year;
- HEA would provide advance notification to institutions regarding their allocation thus assisting them in planning ahead; ideally linking this to notification of other access funding, i.e. access element of RGAM, SAF, etc. and on a calendar year basis;
- The payment profile would be linked to the academic year and receipt of claims. The majority would be paid out/drawn down as the academic year progresses though HEA would hold back a proportion (for example up to 20%) until the final claim is approved.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

RECOMMENDATION 3

A greater level of accountability and assurance should be included in the new model for allocating funding under FSD such that:

- Regular random checks are carried out on site/within institutions by the HEA to provide quality control/audit function. These should examine in particular needs assessments and also how funding has been used to ensure this is consistent with the aims/objectives and criteria/guidelines of the FSD. A proforma/checklist of key issues would be developed in advance.
- A process is established to follow a representative sample of students who are supported through the FSD in order to establish what happened and in particular the difference made by the FSD. This would be focused on the impact of the fund rather than audit (process compliance). The data collection process (to capture key concise information on use of funding/support from FSD and difference made) should ideally be automated/on-line to minimise the resource required to carry this out.
- Data collection meets ESF requirements.

RECOMMENDATION 4

We recommend that all institutions in receipt of FSD funding be required to demonstrate a **“whole institution” approach to supporting students with disabilities** as a condition of receiving FSD funding (which should be focused on high needs students).

To demonstrate the institutions' approach and to ensure that the FSD funding is targeted at those with the greatest need, this should include:

- Providing evidence to meet agreed **criteria** to be eligible to receive FSD funding:
 - ▶ **Minimum level of access infrastructure** (that should be funded by Access funding provided as part of recurrent funding rather than FSD)
 - ▶ **Disability Plan/Strategy**⁸⁶ (whole college approach) including
 - ▶ Approach to conducting **needs assessment** with individual students to ensure that the FSD focuses on those with high needs;

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For example this could include:

- audit of current access infrastructure
- evidence of need for support – gaps in provision (access infrastructure).
- plans to develop disability services/infrastructure demonstrating that FSD focus will be on supporting high needs only thus encouraging institutions to develop access infrastructure (e.g. apply Universal Design for Learning (UDL) policies)
- How FSD complements existing access commitments such as developing inclusive teaching and learning processes, e.g. in organisation strategy, Compact, etc.
- Role of careers' service
- Monitoring including HEA strategic dialogue process and Performance compacts with the institutions

- **Accountability for how FSD funding is spent** within the institution including reporting. Each institution should submit an end of year reconciliation (signed off at a senior level for example by the Registrar) detailing:
 - ▶ how FSD funding spent
 - ▶ number of students supported through FSD by category of disability, by full/part-time status, etc.
 - ▶ Details of outcomes for those who are supported in particular progression to labour market or further study, retention etc.

RECOMMENDATION 5

The Implementation Group should clearly set out the **how any potential underspend may be used** as part of their remit. Whilst there may be scope for HEIs to carry forward underspend, in advance of agreeing to this, the HEA would require the HEIs to demonstrate reasons for the underspend and detail how the underspend would be used for example to offset specific costs in the following year and/or to develop disability services in the next academic year (as part of the whole institution approach to supporting students with disabilities).

8.6.2 Strand 1: HEA Model, Guidelines and Scope of Fund – Improvements to HEA Guidelines for FSD

RECOMMENDATION 6

The Implementation Group should **ensure that guidelines for the new model for allocating FSD funding are amended** to reflect the changes arising from this review in relation to the changes in the model and eligibility/scope of the fund (including allocation, claims, supports that may be funded, etc.) and in relation to categories of students eligible for support and evidence requirements to support assessment of need.

8.6.3 Strand 1: HEA Model, Guidelines and Scope of Fund – Scope for Harmonisation

RECOMMENDATION 7

The Implementation Group should explore the potential for introducing a **Disability Passport** that would record information on individual students' disabilities (and in particular to avoid re-assessment of conditions that do not change), needs assessments and accommodations at different stages of their educational journey to provide an informed basis for any needs assessment undertaken in FE/HE which should be based in the context of the environment that the student is working within.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

8.6.4 Strand 1: HEA Model, Guidelines and Scope of Fund -Scope of the FSD

RECOMMENDATION 8

In the short term, the HEA should **continue to manage the element of FSD associated with the FE sector**, i.e. support students with disabilities in the FE sector; underpinned and supported by appropriate governance framework (SLA, action plan, etc.) given that the HEA does not have a formal relationship with the FE sector in any other area. In the longer term HEA and SOLAS should work together to transfer the administration of the element of the fund associated with the FE sector to SOLAS, This should provide support to the FE colleges and improve the experience of all those managing the fund.

RECOMMENDATION 9

We recommend that:

- the FSD should continue to provide support for Irish students who study in NI and other parts of the UK until the UK leaves the EU;
- arrangements for supporting **Irish students in NI and other parts of the UK** should be reviewed in advance of Brexit in order to define arrangements for supporting these students following Brexit;
- the FSD should continue to provide support for **Irish students who study in other EU countries.**

RECOMMENDATION 10

The FSD should introduce support for **part-time students** in Irish FE and HE sector who are on credit bearing courses or leading to a full award (consistent with full-time students). This could be introduced on a pilot basis for HE part-time students initially.

8.6.5 Strand 2: Financial Provision of the Fund

RECOMMENDATION 11

We recommend that the **level of funding** allocated to the FSD is increased by at least €580K per annum to cater for the anticipated increase in numbers of students with disabilities and to ensure that the targets for increased participation in higher education by people with disabilities (set out in the National Access Plan) are met.

8.6.6 Strand 3: Educational Institutions and the Fund

RECOMMENDATION 12

Establish new fora and/or make use of **existing fora to share good practice and identify opportunities for further efficiencies** across institutions which benefit from FSD funding. (Efficiencies might include, for example: scope for centralising some procurement of services, etc.).

In the HE sector, existing fora might provide a vehicle for this – for example: DAWN, AHEAD, Teaching & Learning Forum (though the latter has a broader remit and is not solely concerned with disability).

In the FE Sector, there is a need to develop fora and access to support/sharing of good practice.

8.6.7 Strand 4: Student Experience of the Fund

RECOMMENDATION 13

There is scope to improve processes in relation to the FSD and in particular those relating to communication and sharing of information – for example:

- **Communication and awareness raising** (for wider FE/HE community: staff and students)
 - ▶ Increased communication between disability support services and lecturers/teaching staff;
 - ▶ Awareness training for lecturers/teaching staff so better equipped to support students with a disability from outset;
- **Peer support amongst students with disabilities:** More opportunities for peer support/group interactions for students to discuss how they manage their disability/what supports they have as well as social support;
- **Expanding services**, e.g.: learning support outside of class time/college hours;
- **Mainstreaming of services** for disabled students. Fora to share good practice.

8 CONCLUSIONS AND RECOMMENDATIONS (CONTINUED)

RECOMMENDATION 14

In order to maximise the impact of the FSD, it is important that promotion of disability services and support to transition link in with those who will benefit from the service to raise awareness of supports available and encourage potential students to consider their needs in advance, and also consider how best they support those who are currently benefitting to progress to the next stage in their career as follows:

- **Promoting disability services** – orientation for students in FE/HE and promote support available to pupils at secondary schools; positive aspirations.
- **Increase support to transition** to further study and labour market including transition year, career guidance, work related skills and experience, etc. These recommendations relate to the wider role of Disability Services and would not be funded through the FSD, but more likely through core grant funding.



Glossary



9 Glossary

Glossary

ADCET	The Australian Disability Clearinghouse on Education and Training
ADD	Attention Deficit Disorder
ADHD	Attention Deficit Hyperactivity Disorder
AHEAD	Association for Higher Education Access and Disability
ASD	Autism Spectrum Disorder
ASSD	Additional Support for Students with Disabilities
AT	Assistive Technology
CAO	Central Applications Office
DARE	Disability Access Route to Education
DAWN	Disability Advisors Working Network
DDLETB	Dublin & Dún Laoghaire Education & Training Board
DES	Department of Education and Skills
DSA	Disabled Student Allowance
DSP	Disability Support Program
ESF	European Social Fund
ETB	Education and Training Board
FAFSA	Free Application for Federal Student Aid
FE	Further Education
FEI	Further Education Institution
FSD	Fund for Students with Disabilities
GLD	General Learning Disabilities
HEA	Higher Education Authority
HEAR	Higher Education Access Route
HEI	Higher Education Institution
HND	Higher National Diploma
IOT	Institute of Technology
ISL	Irish Sign Language
LIT	Limerick Institute of Technology
LITH	Low Incidence Teaching Hours
NCSE	National Council for Special Education
NEPS	National Educational Psychological Service

9 GLOSSARY (CONTINUED)

NMH	Non-Medical Helper
PA	Personal Assistant
PACEC	Public and Corporate, Economics Consultants
PEIL	Programme for Employability, Inclusion and Learning
PLC	Post Leaving Certificate
RA	Reasonable Accommodation
RGAM	Recurrent Grant Allocation Model
RT	Resource Teaching
SAAS	Students Awards Agency Scotland
SAF	Student Assistance Fund
SCC	Student Contribution Charge
SEC	State Examinations Commission
SEG students	Students from defined Socio-Economic Groups
SENO	Special Education Needs Organiser
SFE	Student Finance England
SFNI	Student Finance Northern Ireland
SFW	Student Finance Wales
SNA	Special Needs Assistant
SOLAS	Further Education and Training Authority
SpLDs	Specific Learning Difficulties
SU	Students' Union
SUSI	Student Universal Support Ireland
TLA	Third Level Access
USI	Union of Students in Ireland



List of Appendices

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10 List of Appendices*

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