July 13, 2021

MICHAEL BROWN, PROVOST
UNIVERSITY OF CALIFORNIA

Re: Recommendations on Neurodiversity

Dear Colleagues,

At its June 2021 meeting, the Academic Council endorsed the attached set of recommendations for making UC a more welcoming place for neurodiverse students with atypical neurological function, including those on the autism spectrum, with ADHD, or dyslexia.

The recommendations were brought to us by the University Committee on Affirmative Action, Diversity, and Equity (UCAADE), and were authored by the student-led UCD Aggie Neurodiversity Committee, which seeks to create awareness about neurodiversity and its challenges and benefits for the learning environment. The recommendations include recognizing neurodiversity as a diversity, equity, and inclusion issue; creating Disability Cultural Centers on campuses that include programming and support services for neurodiverse students; providing neurodiversity training to faculty, staff, and students; and improving various accommodations and support systems in learning environments and other campus resources and facilities. We share UCAADE’s belief that implementing the recommendations will enrich learning environments to the benefit of all.

We ask that you facilitate the distribution of the recommendations to appropriate campus administrators, including chief diversity officers, provosts and vice provosts, as best practices to adopt.

Please do not hesitate to contact me if you have additional questions.

Sincerely,

Mary Gauvain, Chair
Academic Council

Cc: Vice Provost Gullatt
    Chief of Staff to the Provost Peterson
    Academic Council
    Senate Directors
    Executive Director Baxter
MARY GAUVAIN
CHAIR, ACADEMIC COUNCIL

RE: UCAADE STATEMENT ON NEURODIVERSITY

Dear Mary,

I am writing with the full support of the University Committee on Affirmative Action, Diversity, and Equity (UCAADE). UCAADE recently met with representatives from the UC Davis Aggie Neurodiversity Committee, whose goal is to create awareness across campuses about neurodiversity in students, and its challenges and benefits for the learning environment.

Attached please find a statement from UCAADE requesting actions for making UC a more welcoming place for neurodiverse students, and a set of recommendations from the Aggie Neurodiversity Committee that UCADDE also fully supports.

We ask Council to endorse these recommendations, and forward them to the UCOP administration as best practices for all campuses to adopt. I look forward to Council’s consideration of this issue.

Sincerely,

Javier Arsuaga
Chair, UCAADE

cc. UCAADE
Recommendations for making UC a more welcoming place for neurodivergent students

The University of California Regents Policy 4400 affirms: The diversity of the people of California has been the source of innovative ideas and creative accomplishments throughout the state’s history into the present... Diversity aims to broaden and deepen both the educational experience and the scholarly environment... Therefore, the University of California renews its commitment to the full realization of its historic promise to recognize and nurture merit, talent, and achievement by supporting diversity and equal opportunity in its education, services, and administration, as well as research and creative activity.

Neurodivergence: What it is and how common it is
A neurodivergent person is an individual whose mind or brain is atypical in a way associated with disability. Neurodivergence includes, among others, autism and attention deficit hyperactivity disorder (ADHD). The CDC has estimated that 1 in 54 children at the age for 8 have characteristics within the autism spectrum and rates of diagnosis have dramatically increased by more than 600%, in the last decades. It has been recognized that in many cases autism and ADHD may be undiagnosed because of cultural or socioeconomical factors. Barriers to diagnosis may include stigma and the cost of diagnosis.

Neurodivergence and the college experience
College represents a challenging experience to many neurodivergent students. More than half of autistic young adults do not pursue a college degree and many of those that do, do not finish their degree. It is currently estimated that between 0.7 and 1.9% of college students are autistic and about 5% of students report ADHD. It is important to acknowledge that challenges that neurodivergent students face are not necessarily academic and go beyond student accommodation in test taking or note taking in the classroom. These include discrimination by other students, misunderstanding by instructors, difficulty transitioning from high school into college and from college into the workforce, overstimulation at social events, such as orientation or commencement and in overpopulated student areas, and lack of guidance on how to navigate the college system. We expect that the transition between from on-line to in-person teaching will be a challenge for many neurodiverse students.

Neurodivergence at the University of California
According to the office of the president, 21% of students with disabilities are autistic or report ADHD. Neurodivergent students and they have the lowest graduation rate than any other disability group. The graduation rate for neurodiverse students is 58% but 79% for students without disabilities. Similarly, to other disability groups, neurodivergent students reported decreased campus friendliness, safety and respect.
Collaboration between UCAADE and the Aggie Neurodiversity Community at UC Davis (ANC)
Chair Arsuaga took a training course offered by ANC and after a brief discussion decided to meet again and arrange a meeting with UCAADE. The presentation by ANC was “eye opening” for several members of UCAADE and while the members of UCAADE acknowledge the efforts being made by the UC system to help improve the environment for neurodiverse students, such as the presence of Disable Student Services, priority registration for classes, and certain housing accommodations, we believe that more needs to be done to ensure the well-being and integration of neurodiverse students. One important step, in line with the UC Berkeley Disability Cultural Center, is the creation of Disability Cultural Centers that facilitate the interaction between neurodiverse students, provides resources for students, staff and faculty, and helps build a sense of community among neurodiverse students.

ANC has redacted a set of recommendations (see attached document) that UCAADE fully supports. UCAADE also consulted with Prof. Brian Soucek (current chair of UCAF). Prof. Soucek’s opinion is that these requests are reasonable from the point of view of academic freedom. UCAADE believes that these represent an important first step towards creating equity for neurodiverse students in the UC campuses.

[5] Supporting Students with disabilities at the university of California. 11/2020 report by the Office of the president
June 3, 2021

F. Javier Arsuaga, Chair
Committee on Affirmative Action, Diversity, and Equity (UCAADE)

Re: Neurodiversity as an Aspect of Diversity, Equity, and Inclusion

Dear Professor Arsuaga,

Thank you very much for the opportunity to present information and recommendations regarding the accessibility and inclusiveness of the University of California system for neurodivergent students, staff, and faculty.

As you know, neurodiversity is an important aspect of the diversity promoted in the University of California’s core values, but unfortunately, neurodivergent people today face serious barriers and disparities in higher education and in society generally. These can be exacerbated by intersectionality and co-occurrence of disabilities.

We believe the University of California has an important opportunity to become a leader in the rapidly growing area of neurodiversity. We believe initiatives and reforms within the University of California, such as the suggestions we have enclosed here, could help to address the marginalization, inaccessibility, and discrimination faced by so many neurodivergent people today. These changes would not only directly impact the thousands of neurodivergent people in the University of California, but also could make the University of California both a high-profile model for other institutions and a preferred destination for neurodivergent individuals in higher education.

Warm regards,

Patrick Dwyer
President, Aggie Neurodiversity Community at UC Davis
Thanks to advances in diagnosis, awareness, supports, and accessibility, increasing numbers of neurodivergent students are attending top universities like the UCs. Indeed, one study suggests that 0.7-1.9% of college students are autistic.\(^1\) Another 5% of incoming students report having ADHD and 3% report having specific learning disabilities,\(^2\) to whom must be added those students whose ADHD or learning disabilities remain undiagnosed.

Further, the world at large is learning that society benefits from the inclusion of “different brains” in all walks of life—both academic and all kinds of work environments. Many companies are now deliberately seeking to include neurodivergent employees among their ranks for the different perspectives they provide.

Despite these advances, the road for many neurodivergent students as they try to make their way through post-secondary education broadly and UCs specifically can be challenging. Neurodivergent students, including those who are autistic and/or have ADHD, have lower rates of completing their postsecondary studies than the general population\(^3\). Moreover, much of the attention towards neurodiversity in higher education to date has been focused on undergraduates; neurodivergent graduate students, faculty, and staff also have important needs.

While the barriers facing disabled and neurodivergent people are often interpreted in light of disability-related functional limitations and impairments, neurodivergent people also face societal barriers, prejudice, and discrimination.

In this context, we believe there is an opportunity for the UCs to take a leadership role in pioneering approaches that enhance the success of its neurodivergent students and increase their participation in university life and community. Not only does this protect the rights of these students to an appropriate education, but it also helps the university achieve its goals for inclusion and equity.


These recommendations describe opportunities we see for the UCs to participate in and change the dialogue about neurodiversity: to celebrate the richness of neurodiverse culture, to train its faculty and staff in how to welcome and support neurodivergent students, to create world-leading policies and practices, and ultimately to create the kind of inclusive world where we all want to live.

1. **Establish a campus-level Disability Cultural Center** - or an alternatively named equivalent - to provide a space for community for disabled and neurodivergent students. Disability and neurodiversity are often conceptualized narrowly in terms of functional limitations that necessitate accommodations, but disability and neurodiversity can also be a basis for identity, for culture, and for community, as is the case with any other minority or marginalized population. A Disability Cultural Center should include a welcoming space open to disabled and neurodivergent students. In addition, a Disability Cultural Center should have diversely disabled employees and/or volunteers and disabled-led resources to foster community on UC campuses and support initiatives aimed at greater inclusion and acceptance of disability and neurodiversity in UC campus communities.

2. **Recognize neurodiversity as a Diversity, Equity, and Inclusion (DEI) issue.** The direct impacts of functional limitations associated with neurodivergence and disability coexist alongside and blend into impacts caused by societal barriers, inaccessibility, stigma, discrimination, and failures of inclusion. Neurominorities are marginalized populations. If autism is taken as an example, research suggests that neurotypical people struggle to understand perspectives of autistic people,⁴ that autistic people are perceived to be deceptive and non-credible when telling the truth,⁵ and that autistic people face implicit negative attitudes and bias.⁶ Indeed, even observing an autistic person for just a few seconds is sufficient for neurotypical people to negatively evaluate the autistic person - although transcripts of autistic people’s speech are not negatively evaluated in this way,

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suggesting that the negative judgements are driven by style, not substance.\textsuperscript{7} It is thus hardly surprising to find that autistic people and their families report experiencing considerable discrimination in communities.\textsuperscript{8} Importantly, autistic people face discrimination in employment decisions; employers are less likely to show interest in applications in which an autism diagnosis is disclosed.\textsuperscript{9} Autistic college students also face elevated bullying.\textsuperscript{10} Furthermore, intersections between disability and other marginalized populations can be associated with additional barriers and obstacles. Approximately fifty percent of all police brutality victims in the United States have at least one disability, including autism and other neurodivergent neurotypes.\textsuperscript{11} Notably, to again take the example of autism, there are large income, race, and parental education disparities in autistic people’s access to postsecondary education.\textsuperscript{12} There are also gender and parental education disparities in postsecondary retention/persistence.\textsuperscript{13} It is therefore essential to ensure that disability and neurodiversity are not solely considered in terms of functional limitations and impairments, but also as a matter of DEI. Actions required to ensure appropriate consideration of neurodiversity in DEI could include (but are not limited to):

a. Ensuring that personnel in DEI offices and roles are adequately qualified to identify and address DEI issues affecting neurodivergent students, staff, and faculty;

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b. Ensuring that neurodiversity, and intersections between neurominorities and other marginalized communities, are considered in all DEI initiatives and programs;

c. Collecting data about representation of neurodivergent students, staff, and faculty, as well as regarding representation of intersections between neurominorities and other marginalized communities;

d. Striving to increase representation of neurodivergent students, staff, and faculty, as well as representation of intersections between neurodivergence and other marginalized identities;

e. Collecting data about challenges faced by neurodivergent students, staff, and faculty, as well as challenges faced by neurodivergent people with other marginalized intersectional identities; and

f. Ensuring that mechanisms - such as remedial training and disciplinary processes - are in place and working effectively to address discriminatory behavior towards neurodivergent people by UC personnel.

3. **Provide campus-wide neurodiversity trainings to UC faculty, staff, and students**; versions of trainings for faculty should include material regarding Universal Design (UD). In the domain of autism, online and easily-scalable training curricula have been shown to not only increase knowledge of autism, but also to diminish stigma towards autism, among both students\textsuperscript{14} and faculty\textsuperscript{15}. Autism and UD training for faculty has also improved attitudes towards UD\textsuperscript{16}. This suggests that neurodiversity and UD training can be an effective means of fostering greater inclusion of neurominorities in campus communities, as well as providing instructors with tools to be more inclusive in their teaching. UD aims to benefit all students, including neurotypical and non-disabled students.

4. **Ensure that neurodivergent people are meaningfully involved as leaders in neurodiversity initiatives**, such as the neurodiversity trainings mentioned above. Empirical research has found that autism trainings developed in a participatory manner, in collaboration with


\textsuperscript{16} Ibid.
autistic people, are more effective in increasing knowledge, reducing stigma, and fostering inclusive attitudes than autism trainings developed by non-autistic people. These results emphasize the importance of the disability advocacy slogan, “Nothing about us without us”: disabled and neurodivergent people may be the best judges of what their communities need to thrive. However, insofar as neurodivergent and disabled students already face barriers and stress in their lives, it is important to ensure that they do not face pressure to provide uncompensated volunteer support to campuses’ disability-related initiatives. Instead, for example, meaningful neurodivergent involvement could be provided by financially compensating neurodivergent students for their oversight of neurodiversity initiatives and/or by hiring neurodivergent employees to work on these initiatives.

5. **Integrate disability accommodations to enhance accessibility.** At present, it is not uncommon for neurodivergent members of UC community to have to obtain accommodations from multiple different offices. For example, a student employee might need to work with different offices to obtain accommodations in their academic classes, accommodations related to their job, and accommodations related to housing and dining. Each of these offices might have separate points of contact and separate eligibility requirements, imposing enormous advocacy and administrative challenges on neurodivergent people who already face substantial barriers in their day-to-day lives. These challenges may include struggles with organization and executive function. Moreover, in some cases - e.g., in graduate programs, where student employee and academic responsibilities can blend together - responsibility for providing accommodations can become unclear, such that no office may come forward to provide support. To ensure clear responsibility for and accessibility of disability accommodations, a more centralized approach appears necessary. At a minimum, this should include harmonized eligibility requirements and a clear division of responsibility among different offices providing accommodations. Preferably, all disability accommodations should be housed in a single office, and each disabled member of the UC community should have a single primary contact to coordinate their accommodations.

6. **Ensure that eligibility for disability accommodations can be easily demonstrated.** Updated psychoeducational and neuropsychological assessments that neurodivergent people might

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be asked to provide as proof of disability can cost $2000-$5000, which could be beyond the financial means of many individuals and families (especially when high rates of poverty among disabled people\textsuperscript{18} are taken into account). Moreover, requirements that can impose out-of-pocket costs on a marginalized group violate principles of equity. It is important to note that accommodations must be available to students and employees at the moment they begin their work or studies, and therefore any required proof of disability must also be provided in advance: UC health coverage or other programs that only become available as students and employees begin classes and work cannot be relied upon as a means of paying for assessments.

Thus, to ensure that UC campuses can promptly and equitably provide disability accommodations required by law, eligibility requirements for disability accommodations must be appropriately flexible. For permanent neurodevelopmental disabilities, such as autism or ADHD, documentation should be accepted regardless of time-frame: no requirement for recent documentation should exist. Individualized education plans (IEPs), and international equivalents, should be accepted as proof of disability.

7. Recognize and accommodate sensory discomfort, distraction, distress, and overload. The sensory experiences of neurodivergent people, such as autistic people, appear to be closely related to\textsuperscript{19} or even an aspect of\textsuperscript{20} quality of life. They are associated with sleep quality\textsuperscript{21} and mental health.\textsuperscript{22} These issues are especially important in relation to housing and dining. Students should be able to expect sensory accommodations in relation to food and dining, such as the flexibility to take their food away from dining commons spaces in order to avoid noise, as well as provision of alternatives to foods that cause sensory distress. Students vulnerable to sensory distress and overload also need to be able to retreat to a

\textsuperscript{18} United States Census Bureau, https://www.census.gov/data/tables/time-series/demo/income-poverty/p70-137.html
space where they will not be subjected to sensory bombardment, such as a single room with no roommate and/or a room in a “quiet” dormitory building with additional noise limits. If these sorts of accommodations are unavailable, this could cause distress and burnout, impacting both mental health and academic success. Other areas on campus, such as libraries, can also be experienced as inaccessible due to sensory experiences, such as discomfort or excessive distraction. Considering sensory accessibility in new construction and renovations could make UC campuses less stressful for many neurodivergent students to navigate and work in.

8. **Establish supports to ensure a smooth transition into college.** College transition programs have traditionally targeted low-income or racialized populations, but are more recently emerging as a priority for neurodivergent students, such as autistics. There are many possible models, but for example, transition support could include:
   a. Summer transition programs. Incoming neurodivergent students could arrive on campus early so that they could be oriented to the campus environment and housing. In addition, transition programs could include information about and discussion of campus academic expectations, relevant support centers and offices on campus, and other domains of campus life. Such transition programs could also be used to build community among neurodivergent students.

   (Note that social skills training, which is sometimes included in programming for autistic students, is not widely used or appreciated by them. Instead of learning about ways to fit in with students different from themselves, students might prefer to find communities of like-minded students who will accept them as they are. Thus, social skills were intentionally omitted from the list of content domains for transition programming above.)

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24 Nachman, B. R. (2016). Enhancing transition programming for college students with autism: A systematic literature review. *Journal of Postsecondary Education and Disability, 33*(1), 81–95.

b. Check-ins during the first quarter. Neurodivergent students who drop out of college report that they became disengaged from their university\(^\text{26}\) and found the transition into their university more difficult.\(^\text{27}\) Check-ins during the first quarter could help identify neurodivergent students who are struggling but disengaged and not seeking support. Support staff could then provide support to struggling students and work to counteract disengagement, improving retention.

9. **Establish supports to ensure a smooth transition out of college.** Just as the transition into university can create additional barriers and challenges for neurodivergent students, so too can the transition out of college and into employment or graduate school present obstacles. This could reflect a number of different barriers. For example, as noted above, neurodivergent people may face discrimination in hiring decisions. However, in addition, the social isolation faced by neurodivergent students may make them vulnerable to missing important “word of mouth” information about expectations employers hold and work/volunteer experiences students may need to seek out. Internship and work experience programs intended for neurotypical students may not address important challenges faced by neurodivergent students. A number of supports could help address these gaps, such as:

   a. Information about unwritten expectations in the post-graduation world. Formal trainings could cover expectations surrounding the sorts of experience necessary to be a competitive candidate for employment or graduate school, expectations and norms surrounding cover letters and resumes/CVs, how to interpret job qualification requirements (i.e., that it may not be necessary to meet every single listed qualification), and other important information often transmitted through word of mouth. Because some of these expectations (e.g., requirements for certain sorts of experiences) may require early action, this information should be provided early.

   b. Work experience and internship programs that are designed with the challenges faced by neurodivergent people in mind. For example, autistic students may require additional guidance regarding social norms of workplaces, additional practice with


job interview skills, and assistance with executive function demands of navigating the job market.

(Note that social skills training in an employment context may be more acceptable and useful than in the context of promoting friendships.)

c. Work experience and internship programs that involve working with employers to develop job opportunities for neurodivergent students. Although many employment interventions in the autism field focus on teaching skills to autistic people, these programs can only have limited effects, for it is often difficult to teach skills through theory rather than practice. Moreover, as noted above, neurodivergent people face discrimination in hiring, which is not addressed by programs that focus on neurodivergent people rather than prospective employers. However, programs that place neurodivergent people in temporary internships have been shown to be extremely effective in promoting sustained employment, perhaps due to a combination of work experience that can go on resumes, acquisition of references, and learning of job skills in practical, applied contexts. One study of such a program found 87% employment rates among the intervention group, compared to 12% among controls, a year after the program ended.29

10. Improve the mental health support available to neurodivergent students. Autistic college students experience elevated rates of anxiety, depression, and mental health challenges in comparison to neurotypical peers,30,31,32 as well as high rates of lifetime (75%) and current

(54%) suicidality.\textsuperscript{33} This high level of suicidality is consistent with other research suggesting autistic people are eight (8) times more likely to die by suicide than non-autistic people.\textsuperscript{34} Students with ADHD face a similar mental health crisis. Rates of depression are elevated among college students with ADHD\textsuperscript{35} and students with ADHD are four times more likely than comparison students to attempt suicide.\textsuperscript{36} To address this crisis, the following steps appear necessary:

a. **Offering neurodivergent students an adequate number of appointments with a preferred counsellor.** Prior research demonstrates that autistic college students require a larger number of counselling appointments to experience the same improvements to mental health found in non-autistic students.\textsuperscript{37} This may reflect the greater complexity and pervasiveness of the mental health challenges faced by neurodivergent students; it should be noted that experiences of trauma are much more common among autistics than in the general population.\textsuperscript{38} Thus, any policies that limit the number of counselling appointments students can receive - or that prevent students from consistently seeing a single preferred counselor with whom they have a positive relationship - could prevent mental health supports from being effective for neurodivergent students. Neurodivergent students should be allowed to access consistent and sustained support.

b. **Hiring counsellors with expertise in supporting neurodivergent students.** An emerging but rapidly-growing research literature documents the challenges autistic


people face in finding supportive clinicians and counsellors, most commonly due a lack of therapist expertise in autism or due to therapists’ unwillingness/inability to modify their practices to support autistics.\(^{39}\) In one study, only 1 of 44 clinicians learned about autism in their professional training.\(^{40}\) However, 98% of autistic people rate whether or not a clinician understands autism as important.\(^{41}\) Indeed, autistic people often find clinical mental health supports to be unhelpful and not tailored to their needs,\(^{42}\) and therapists’ lack of experience with autism can prevent autistic people from receiving therapy and support.\(^{43}\) In one study, 20 of 22 autistic people reported having negative experiences of psychotherapy.\(^{44}\) Hiring counsellors who have experience working with neurodivergent people, and who have an attitude of openness and willingness to be flexible to suit the individual needs of neurodivergent clients, could dramatically increase the accessibility and usefulness of counselling supports for neurodivergent UC students.

c. **Offering mental health support groups for neurodivergent students.** Formal mental health support groups would be distinct from and complementary to individual counseling support and the informal communities found in disability cultural centers.


11. **Ensure that there are mechanisms in place to swiftly provide remediation in cases where neurodivergent students are prevented from receiving accommodations.** For example, if an accommodation need is not respected by an instructor, a swift process is needed to ensure that the accommodation can be rapidly put in place, as well as to ensure the instructor will respect accommodations in the future. In addition, if a neurodivergent student or employee has a poor relationship with their disability contact/specialist/counselor, and/or believes that this disability contact/specialist/counselor has failed to authorize necessary accommodations, an appeals process is needed to resolve the accommodation dispute; furthermore, a clear process for switching to a different case worker is necessary in such cases.

12. **Offer flexibility of modalities to ensure that neurodivergent people can communicate with offices and centers on campuses.** Many neurodivergent people find communication using certain modalities inaccessible. For example, one recent study indicates that 61% of autistic people will delay or avoid seeking necessary medical care in order to avoid using the telephone. This may reflect difficulties with speech-in-noise auditory perception, reliance on missing nonverbal cues (e.g., facial expressions), or other factors making telephone communication inaccessible to the point that one would risk one’s health to avoid it. However, the solution to this problem is not simply to avoid using telephones; different individual neurodivergent people can have different communication accessibility needs. Offering various communication options – such as telephone, email, and online systems for scheduling appointments – can provide accessibility for all.

13. **Respect and support collaboration with an advocate to the extent that student feels it is necessary to achieve success.** While still respecting FERPA guidelines, make the process of involving the advocate clear and accessible. There are many complexities to managing college life that neurodivergent students may find especially challenging and overwhelming. This could be related to executive function challenges, difficulties with transitions, or the fact that neurodivergent students typically have less peer interaction to provide advice and support. Further, many neurodivergent students have a history of significant involvement from parent advocates who have a deep understanding of the particular challenges that student will face and how those challenges can be overcome.

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Creating a welcoming environment for advocate involvement could have multiple effects: it will increase the comfort of the neurodivergent student, it will open up a more productive dialogue between the student and UC faculty/staff, and it will ensure that the student is more successful in graduating. Making it clear that advocate involvement is welcomed takes away some of the stigma that some neurodivergent students may feel about involving an advocate. Making questions about how to involve an advocate part of the initial conversation about accommodations would make it easier to implement. And ensuring that faculty, advising and professional staff understand the need for and the potential benefits of an advocate in discussions with neurodivergent students will make those discussions easier and potentially more productive.

At the same time, faculty and staff should of course recognize that not all neurodivergent students will be comfortable involving advocates - family or otherwise. Indeed, many neurodivergent people may be actively resisting pressure from family members who wish to be more involved in students’ studies, contrary to principles of self-determination and autonomy. The spirit of FERPA is not only about protecting student privacy but also about enhancing student choice regarding how information is shared, and this student choice should be made simple, accessible, and non-judgmental.