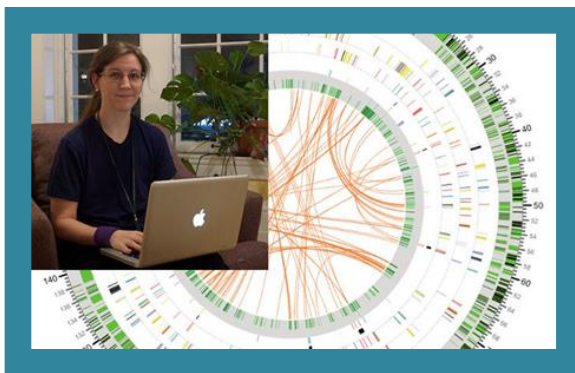
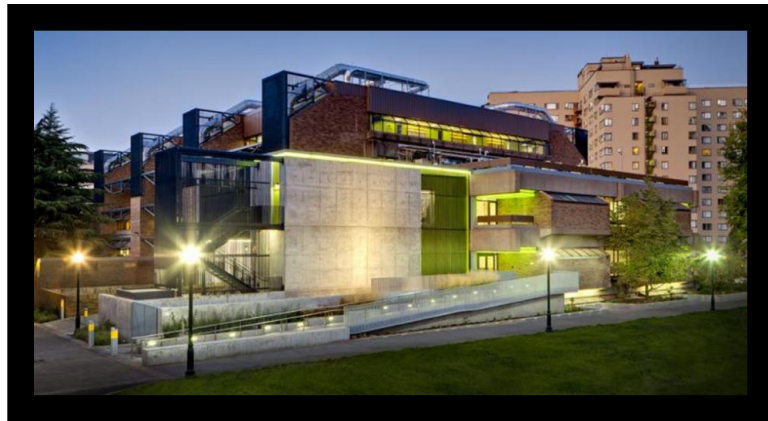


# **PORTLAND STATE UNIVERSITY**

## **COLLEGE OF LIBERAL ARTS AND SCIENCES**

### **AGE DISCRIMINATION ACT COMPLIANCE REPORT**



**Office of Diversity and Equal Opportunity**

**November 2016**

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## I. INTRODUCTION

### A. Background

As a Federal grant-awarding agency, NASA evaluates grant recipient compliance with the Age Discrimination Act of 1975 ("the Age Act" or "the Act").<sup>1</sup> This compliance review of Portland State University (also referred to as "PSU" or the "University") and, in particular, its College of Liberal Arts and Sciences ("CLAS"),<sup>2</sup> a NASA grant program recipient, was conducted by NASA under the authority of the Age Act and its companion NASA regulations.<sup>3</sup> This review focused on ensuring that PSU and CLAS are complying with the law and NASA regulations, fully understand the Age Act and its corresponding legal obligations, and are implementing policies and procedures appropriate to achieving equality of access for all students, regardless of age.

### B. Scope

The Age Act and NASA regulations prohibit discrimination based on age in any program or activity receiving Federal financial assistance. Unlike the Age Discrimination in Employment Act ("ADEA"), which is designed to protect individuals over the age of 40 in the employment setting, the Age Discrimination Act of 1975 does not define the protected category of beneficiary by a specific age or age range. In other words, the Age Act is designed to protect individuals of any age in programs receiving Federal financial assistance.<sup>1</sup>

NASA's Age Act regulations provide tools for effective oversight and monitoring of the Act's requirements. Each recipient is required to sign a written assurance that it will comply with the regulations and avoid discrimination based on age.<sup>2</sup> The University, as a recipient of NASA grants, has signed the required assurances. In addition, NASA may require recipients to provide, upon request, information and reports, including self-evaluative information, that NASA determines necessary to ascertain whether the recipient is complying with the Act and its regulations.<sup>3</sup> Under this provision, NASA limited the scope of its review to the University's and CLAS's methods of administration regarding three substantive measures of compliance:

1. Formal Indicators of Institutional Support for Compliance: NASA examined institutional policies and procedures demonstrating knowledge of and commitment to the requirements of the Age Act, including

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<sup>1</sup>The applicability of the Age Act to all ages is well illustrated by a recent case involving a "child prodigy" at the University of Connecticut who was denied enrollment in a class that required field work in Africa. The student's mother alleged that the denial violated Federal law and the university's antidiscrimination policy. See, [http://chronicle.com/blogPost/13-Year-Old-Prodigy-Claims-age/21813/?sid=pm&utm\\_source=pm&utm\\_medium=en](http://chronicle.com/blogPost/13-Year-Old-Prodigy-Claims-age/21813/?sid=pm&utm_source=pm&utm_medium=en).

<sup>2</sup> See, 14 C.F.R. § 1252.302(a).

<sup>3</sup> See, 14 C.F.R. §1252.302(b) and §1252.303.

compliance “infrastructure,” such as policies and procedures, as well as notice of and education on these.

2. Admissions Policies and Outreach Efforts: NASA analyzed admissions policies and institutional outreach efforts that eliminate or limit potential barriers to entry, and may also attract nontraditionally aged students. For purposes of this review, NASA defines “nontraditionally aged” students as undergraduates over the age of 25 when first enrolled as freshmen, and graduate students age 30 or older when starting their graduate program.<sup>4</sup>

3. Access to Programs and Facilities: NASA examined the efforts of PSU and CLAS to ensure equality of access to educational offerings and benefits, including an assessment of current enrollment levels of nontraditionally aged students as compared with national statistics, retention data, and the academic and other support services necessary to achieve degrees from the undergraduate, master’s, and Ph.D. programs.

### C. Methodology

This compliance review was conducted in three phases. The first phase, the Pre-Onsite, consisted of a preliminary “desk-audit” review of the institution’s responses to NASA’s Request for Information and Documents (“Information Request”) seeking information on the three measures of substantive compliance. In particular, the NASA Information Request sought documents and other materials from the PSU and CLAS reflecting policies and procedures on antidiscrimination laws; identification and allocation of staff and training resources; outreach, recruitment, admissions, and enrollment; course offerings, mentoring, and faculty advisors; student services; and family-friendly policies. PSU’s responses to the Information Request serve as the primary basis for this preliminary evaluation of the school’s efforts toward compliance with the Age Act. In addition, NASA reviewed PSU’s website to elicit further information on programs and services.

In May 2016, NASA conducted the second phase of the review: the onsite component of the assessment of PSU and CLAS. NASA interviewed officials charged with antidiscrimination compliance, the department chairs of several of the CLAS programs, and CLAS faculty and staff. Interviews were conducted with a sampling of nontraditionally aged CLAS students from the undergraduate, graduate, and Ph.D. programs. A total of 22 students were interviewed (16 undergraduates, 4 graduate students,

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<sup>4</sup> The National Center for Education Statistics (NCES) acknowledges there is no precise definition for the term “non-traditional student,” but suggests that part-time status and age are common elements in most definitions. Generally, “traditionally” aged undergraduates are between the ages of 18 and 24. NCES uses this as a demarcation based on the age at which students are considered financially independent for purposes of financial aid. See, <https://nces.ed.gov/pubs/web/97578e.asp>, and NCES “Findings from the Condition of Education 2002: Nontraditional Undergraduates,” which can be accessed at <https://nces.ed.gov/pubs2002/2002012.pdf>. See also, “Nontraditional Students Enrich U.S. College Campuses: Older Students Value Challenging Courses with Real-world Applications” (April 29, 2008) (referring to “nontraditional college age students” (age 25 or older)). Accessed at: <http://iipdigital.usembassy.gov/st/english/article/2008/04/200804281212291cjsamoht0.3335382.html#axzz46lk2d34K>.

and 2 Ph.D. candidates). Ages of undergraduate students ranged from 19<sup>5</sup> to 64, from 44 to 62 for graduate students, and from 33 to 56 for Ph.D. candidates. Finally, NASA interviewed key officials designated by the school, who oversee student-fee-funded support organizations<sup>6</sup> or have knowledge of various aspects of the Equal Opportunity (EO) program as it pertains to nontraditionally aged students and their ability to achieve equal access.<sup>7</sup>

Upon return from the onsite visit, NASA synthesized all of the data to develop the institutional profile and compliance analysis contained in this report. The compliance analysis is intended to offer findings, recommendations, and promising practices for better ensuring equal opportunity regardless of age.

## **II. COMPLIANCE ANALYSIS**

In the sections that follow, NASA examines each of the three substantive measures of compliance that are the focal points of this review. Findings of fact and compliance recommendations are provided for each measure and promising practices are cited, as appropriate.

### **A. Formal Indicators of Institutional Support for Compliance**

This measure of compliance is defined by NASA as formal institutional policies, procedures, and programs designed, at least in part, to achieve the goals of the Age Act. This includes the University's efforts to provide mechanisms to address concerns raised by students regarding age, including the apparatus in place to address potential violations of the law, and to foster awareness of the law's requirements. Addressed below are: 1) compliance infrastructure, including staffing, resources, internal discrimination complaints procedures, and monitoring; and 2) notice to and education for the academic community as to their rights and responsibilities under the law.

#### **1. Analysis**

##### *a. Compliance Infrastructure*

Within its Office of Global Diversity and Inclusion ("GDI"), Office of Equity and Compliance (OEC), PSU has three positions whose functions relate to equal opportunity and civil rights matters: Dr. Carmen Suarez, Vice President for GDI; Julie Caron, J.D., Associate Vice President for GDI, Title IX and 504/ADA

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<sup>5</sup> This student entered PSU as a sophomore at age 18 as a result of her participation in PSU's Challenge Program, which provided her with access to college credits while taking certified courses while in high school, and permitted her to attend PSU courses on campus.

<sup>6</sup> Interviews included representatives from the Office for Students with Children, Veterans' Resource Center, and Women's Resource Center.

<sup>7</sup> The Vice-Provost for Academic Innovation was interviewed.

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Coordinator; and Christina James, J.D., Director of Affirmative Action and Equal Employment Opportunity (Deputy Title IX Coordinator). The OEC also employs two contract investigators.<sup>8</sup>

PSU appears to have an excellent understanding of the laws and the University's duties under the Age Act and other civil rights laws. While PSU has no specific policy on the Age Act, the school has a clear and thorough antidiscrimination policy, which is covered by both its *Equal Opportunity Statement*<sup>9</sup> and its *Prohibited Discrimination & Harassment Policy*.<sup>10</sup> The statements do not specifically mention the Age Act; however, they do explicitly support equal opportunity in admissions, education, employment, housing, and use of facilities based upon age and other protected classes.

The school has a clear process for filing complaints and offers methods for in-person, phone-in, and online reporting. The University website provides online links to the complaints process flowchart. It should be noted that complaints alleging discrimination are handled by one of two offices, depending upon the alleged discriminator. The OEC handles all complaints alleging discrimination against faculty, staff, or student employee. The Dean of Student Life handles all complaints alleging discrimination against a fellow student. PSU reported to NASA that, in the past five years, there have been no internal complaints alleging age discrimination against a faculty or staff member or fellow student in the CLAS programs under review.

The OEC has a formal method of monitoring compliance with all laws and regulations. All complaints are input in the Case Tracking system by protected classes and we do an annual audit our cases, based on the nature of the complainant and findings. This is done to look for systemic issues.

The PSU Associate Vice President for GDI and Title IX Coordinator, Julie Caron, indicated that complaints are tracked using a document shared on the internal drive and that, thus far, there appear to be no patterns around age. The Office of the Dean of Student Life indicated that success was measured by the lack of complaints. PSU's Office of Institutional Research and Planning does track student age data and publishes quarterly reports on student demographics. Ms. Caron also reported that the data is regularly evaluated for the purpose of admissions and retention as well as student success initiatives. PSU boasts an average student age that is higher than the national average.<sup>11</sup>

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<sup>8</sup> In addition, PSU reported that it is in the process of hiring a fulltime Equity and Compliance Investigator and Trainer.

<sup>9</sup> See, <http://www.pdx.edu/portland-state-university-mission>.

<sup>10</sup> See, <http://www.pdx.edu/ogc/sites/www.pdx.edu.ogc/files/3.15.13%20REV%20Policy%20on%20Prohibited%20Discrimination%20and%20Harassment%20signed%20final.pdf>.

<sup>11</sup> The Common Data report for 2014 shows that 44% of all undergraduates are age 25 or older and an average age of all students (full- and part-time) is 27 years old.

*b. Notice and Education*

1) Students

During her interview, Julie Caron, of GDI, stated that training on prohibited discrimination practices is included in new student orientation.<sup>12</sup> However, NASA is concerned that there is no mandatory training or monitoring of compliance with training. This is of particular concern as it relates to the many interviewed students who indicated that they either did not attend orientation or had none available to them in their graduate programs. Of the students interviewed, more than half were unaware of the prohibitions against age discrimination in an education setting.

From the student web portal, there is no obvious route to information regarding the Age Act, per se. The GDI, OEC webpage clearly sets out PSU's antidiscrimination policy including age, identifies the office responsible for investigating complaints of prohibited discrimination and harassment, and provides a link to complaint forms and procedure flowchart.<sup>13</sup> Nevertheless, more than half of students interviewed were unaware of the Office of Global Diversity and Inclusion or the Office of the Dean of Students as avenues for addressing discrimination complaints.

In addition to the lack of training on the Age Act and the process for filing complaints, NASA notes some concerns regarding the dissemination of information. First, GDI's webpage provides links to policies and procedures for: Consensual Relationship, Equal Opportunity Statement, Assistance Animals, Prohibited Discrimination and Harassment, Reasonable Accommodation, Religious Accommodation, Student Pregnancy and Postpartum Assistance, Title IX of the Educations Amendments Act of 1972, Affirmative Action Plan, and the 504 Coordinator. However, nowhere on the webpage is there a reference to the Age Act.<sup>14</sup> Second, the complaints process flowchart failed to inform students of the time requirements for filing a complaint or the expected timeline for the process, and there appears to be no information otherwise available, although PSU revised the flowchart soon after NASA's onsite visit.<sup>15</sup> Third, the student handbook is devoid of any information on antidiscrimination or the associated complaints

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<sup>12</sup> In this regard, Julie Caron informed NASA as follows: "The information is provided in the student Handbook that is given to all incoming undergraduates and contains information about how to file a complaint. Additionally information about how to file a complaint is in the student and employee online training. Student employees are required to complete the student training. PSU monitors compliance with the employee online training but does not currently have an effective method to monitor student completion, outside of athletes, mentors, Resident assistants and other student leaders are required to complete student online training to continue in their positions."

<sup>13</sup> See, <https://www.pdx.edu/diversity/office-of-equity-compliance>.

<sup>14</sup> In her review of NASA's draft compliance report, Julie Caron noted that, while PSU does not generally reference a particular law, the Age Act, Title VI, and Title VII, the American with Disabilities Act and other civil rights laws are included in the University's policies and EO statement. PSU enforces all of the statutory requirements by policy.

<sup>15</sup> See <http://www.pdx.edu/diversity/sites/www.pdx.edu.diversity/files/2016%20OEC%20Investigative%20Flow%20Chart.pdf>

process. There is a section entitled “Policies at Portland State University,” which references the Student Code of Conduct, a section on “Healthy Relationships,” Sexual Harassment, and the Disability Resource Center. This would appear to be the appropriate place to include the Equal Opportunity Statement, the Policy on Prohibited Discrimination and Harassment, the complaint procedures and flowchart, and a sample complaint form.<sup>16</sup> Lastly, NASA finds it problematic that website information on complaint procedures and timelines that exist *outside* of the school’s internal processes (*e.g.*, with the Department of Education, NASA, or other state or local authorities with jurisdiction) is not inclusive of applicable timelines for filing in these forums as these may impact how and in what forum(s) a complainant will proceed.

## 2) Faculty, Staff, Student Employees

PSU reported that all PSU faculty, staff, administrators and student employees are required to complete the training module “Creating a Culture of Respect: Preventing Prohibited Discrimination and Unlawful Harassment,” which includes sections on age discrimination.<sup>17</sup> Examination of this module revealed that the references to laws on age discrimination related to the employment context and not the education context, which may lead to a mistaken impression that protections apply only to the employment context.

Interviews of the school’s senior administration and faculty, including some of those administering the NASA grants, indicated that they had no knowledge of the Age Act, *per se*, and a few did not know the formal policies and procedures for reporting an EO complaint. Further, some of the faculty could not recall when they last had formal training on equal opportunity in employment or education. Of concern to NASA is that the OEC reported that both supervisors and managers have reporting obligations and must bring complaints to GDI, when required, and faculty may not know the protected classes or procedures.

Notwithstanding the lack of information on the Age Act, complaint filing, and reporting requirements, most faculty interviewed regarded PSU as a largely commuter-based campus, having a history of serving a large population of nontraditionally aged students, which remains aware of and responsive to the circumstances and needs of nontraditionally aged students.

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<sup>16</sup> In this regard Julie Caron informed NASA that the reporting options are in the handbook and PSU plans to incorporate the EO Statement into next year’s handbook.

<sup>17</sup> *See*, PSU Information Response, at Section I (B)(5).



## 2. Recommendations

**Coordination Role, Policy Dissemination, and Educational Opportunities.** NASA recommends that PSU:

- a. Establish a “coordination” type functional role, modeled on those of related statutes such as Title IX and Section 504 of the Rehabilitation Act, that encompasses the Age Act, and publicly disseminate information on this new coordination role to the PSU community.
- b. Establish in its existing web and training materials a clear distinction between laws addressing equal employment opportunity, such as the ADEA, and those addressing equal opportunity in federally funded programs (including educational programs), such as the Age Act.
- c. Ensure the PSU, CLAS, and other NASA-funded programs post on their websites the NASA brochure on equal opportunity laws (including the Age Act) pertaining to grant recipient institutions.<sup>18</sup>
- d. Develop, deploy, and monitor compliance with expanded EO training as part of mandatory faculty and student orientation/training that clearly distinguishes between employment related laws, such as the ADEA, and laws designed to ensure equality of access to federally funded programs, such as the Age Act.
- e. Provide more detailed information to faculty and students concerning the laws, statutes, rights, timelines, and complaint procedures that exist *within and outside of* the school’s complaint processes (*e.g.*, with the Department of Education, NASA, or other state or local authorities with jurisdiction).

## 3. Promising Practice

**Complaint Forms and Process Flowchart.** PSU has a simple complaint form, whether for age discrimination or other grievance, and has made it available online, for walk-up, or phone-in completion. It also has set forth a flowchart outlining the complaints process, which is clear and easy for stakeholders to understand.

## B. Admissions Policies and Outreach Efforts

### 1. Analysis

This area of inquiry was designed to evaluate PSU and CLAS admissions, outreach, and communications efforts in light of the Age Discrimination Act’s mandate to ensure equal opportunity regardless of age.

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<sup>18</sup> Electronic copies of this brochure are accessible at [http://odeo.hq.nasa.gov/documents/nondiscrimination .pdf](http://odeo.hq.nasa.gov/documents/nondiscrimination.pdf). Hard copies may be acquired by contacting the NASA Office of Diversity and Equal Opportunity (<http://odeo.hq.nasa.gov/contact.html>).

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NASA sought to determine whether, consistent with this mandate, PSU and CLAS reach out to students of both traditional and nontraditional age (*i.e.*, undergraduate students age 25 or over and graduate students age 30 or over).

### *a. Admissions*

Prospective PSU undergraduate students are required to submit scores from either the Scholastic Aptitude Test (SAT) or American College Testing (ACT). However, PSU does not require scores from students who have not attended high school within the prior three years. Prospective students also must have graduated from high school with at least a 3.0 cumulative grade point average (GPA). However, PSU allows for alternate admission standards, including requisite SAT and/or ACT scores, GED scores, or applying as a transfer student.<sup>19</sup>

Prospective PSU graduate students typically must have at least a 2.75 undergraduate GPA, Graduate Record Exam (GRE) scores, letters of recommendation, and space in the program of interest. However, PSU allows for “University Conditional status,” which provides an opportunity for a student to receive “Regular status” by maintaining a 3.0 GPA in the requisite graduate level courses.

PSU requires all undergraduate students, including transfer students, to meet “General Education” requirements in its University Studies program (“UNST”), which covers a traditional four-year program. There are no exceptions or alternate methods of completing these General Education requirements.<sup>20</sup>

Nearly all of the students interviewed (18 of 22) reported that no admission testing was required for their applications to PSU. In fact, an undergraduate math student felt that PSU took his personal story into account and admitted him after he received his GED following a medical condition in high school.

### *b. Outreach*

This area of inquiry was designed to measure the University’s efforts to market to and encourage the application and participation of nontraditionally aged students. PSU reported that it has a higher number of nontraditionally aged students than the national average, due in part to the fact that PSU was founded in the 1940s as an extension college for adult learners—particularly GIs—and continues to provide access to nontraditionally aged students through flexible admissions, transfer policies, co-admit programs with community colleges, and co-enroll programs with local high schools. While PSU has no formal programs providing outreach to nontraditionally aged students, the Biology and other science departments conduct preadmission advising open to all students at Portland Community College and

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<sup>19</sup> See, <http://www.pdx.edu/admissions/minimum-admission-requirements-freshman>.

<sup>20</sup> See, <http://www.pdx.edu/unst/university-studies-program-overview>.

other community colleges.<sup>21</sup> The Office of Admissions also provides advising to students at community colleges

PSU and CLAS attempt to show diversity in the student population through visual imagery on their respective websites, depicting the presence and participation of adult learners. Many students interviewed indicated that they noticed a diversity of ages represented in campus materials. In practice, most students interviewed stated that they felt extremely integrated into the PSU environment.

## **2. Recommendations**

- a. **General Education Requirements.** The University requirement that students meet all UNST General Education requirements in addition to meeting program requirements could place an undue burden on nontraditionally aged learners. PSU and CLAS might wish to utilize an informational survey to determine whether the UNST requirements present barriers to nontraditionally aged students and consider making adjustments as needed.
- b. **Outreach Efforts.** Other departments within CLAS may wish to consider following the example set by the Biology Department by improving outreach to include learning institutions, organizations, and/or employers through which they are likely to reach nontraditionally aged learners. In addition, PSU and CLAS may wish to consider exploring scholarships targeted toward nontraditionally aged students, including veterans.

## **3. Promising Practice**

**Waiver of SAT/ACT Scores for Transfer Students and Other Flexibilities.** PSU does not require students out of school for three years or transfer students to submit SAT or ACT scores. In addition, PSU has alternate admission options, such as “University Conditional status.” These practices demonstrate a commitment to the nontraditionally aged learner.

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<sup>21</sup> See, PSU Information Response, at Section IV (A)(1)(b).

## C. Access to Programs and Facilities

### 1. Analysis

This aspect of NASA's inquiry focuses on student enrollment and students' access to PSU and CLAS programs, facilities, amenities, and services. The examination focused on the data and information collected to determine to what extent the University and CLAS are taking appropriate steps to ensure equal access to programs and resources regardless of age.

#### *a. Enrollment Data and National Comparison*

NASA examined statistics available from the U.S. Census for 2010 and 2011, and others published by the National Center for Education Statistics ("NCES"). According to U.S. Census data for 2011, of the fulltime student population, 63% was under age 25, while 37% was age 25 or older. According to the 2010 Census data, 70% of students enrolled in undergraduate programs were under age 24,<sup>22</sup> while approximately 30% were age 25 or older. A snapshot of the graduate enrollment for the same time period shows that 54% of graduate learners were under age 30, while 46% were above 30. The NCES reports that between 2002 and 2012, the percentage increase in the number of nontraditionally aged students (age 25 and over) has been similar to the percentage increase in the number of traditionally aged students (both at a 35% increase). NCES further reports that this pattern is expected to change. From 2012 to 2022, NCES projects a rise of 12 % in enrollments of students under 25, and a rise of 20 % in enrollments of students 25 and over.

Over a six-year period ranging from 2010 to 2015, CLAS's fulltime nontraditionally aged population ratios were in the same range as the Census ratios for fulltime, nontraditionally aged students in 2011 (64% under age 25; 36% age 25 or older).<sup>23</sup> Individual years, from 2010 to 2016, show a relatively constant ratio of fulltime nontraditionally aged to traditionally aged students.

Individual department figures varied considerably and range from a low of 27% to a high of 61% for nontraditionally aged students. Fulltime nontraditionally aged Biology and Chemistry students were within the range, but Geology students range from 43% (in 2010) to 61% (in 2012) and Mathematics students range from 35% (in 2015) to 50% (in 2010).

The data corresponding to part-time undergraduates shows a different trend. Over the six-year period, data shows that approximately 63% of part-time students were nontraditionally aged (over 25 years of age), with individual department figures ranging from a low of 55% to a high of 82%. From 2010 to 2016, the overall ratio of part-time nontraditionally aged to traditionally aged

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<sup>22</sup> The ages ranged from 14 to 24 years of age.

<sup>23</sup> An important caveat to comparing Census data to CLAS data is that Census data for 2011 was not broken down by the same age groupings as CLAS, nor was it broken down by fulltime or part-time students, or graduate versus undergraduate students.

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students remained relatively constant. This data is consistent with the theory that typical constraints or barriers to fulltime study for nontraditionals may not be present for part-time study.

Over the six-year period, ranging from 2010 to 2015, data shows that approximately 38% of graduate students were nontraditionally aged (over 30 years of age), with individual department figures ranging from a low of 17% to a high of 58%. From 2010 to 2016, the overall ratio of nontraditionally aged to traditionally aged graduate students remained relatively constant.

CLAS data shows that, over the past 5 academic years, the number of nontraditionally aged fulltime undergraduate and graduate students has remained steady and stable without growth. Without further information, NASA is unable to determine whether this reflects any negative action or inaction on the part of the PSU or CLAS.

### *b. Retention*

Over the six-year period, data shows that approximately 34% of students who changed majors are nontraditionally aged, with individual department figures ranging from a low of 23% to a high of 82%. The percentage of biology, chemistry, and mathematics students changing majors did not exceed 46% for nontraditionally aged students. However, data showed that in 2013, 82% of geology students changing majors were nontraditionally aged.

Over the same six-year period, data shows that approximately 53% of students who left the institution were nontraditionally aged, with individual department figures ranging from a low of 42% to a high of 78%. Data on biology and chemistry students show no major anomalies. However, in 2010, 69% of the students who left mathematics were nontraditionally aged, but the number reduced to 50% in 2015. From 2010 to 2016, the percentage of students leaving geology who were nontraditionally aged students rose from 47% in 2010 to 78% in 2015.

NASA was particularly concerned with the unusually high increase in the number of departing geology students who were nontraditionally aged. In interviews with the Geology Department chair and two faculty members, all indicated that the 2012-2013 decrease was largely attributed to the significant faculty and staff changes within the department during that time, noting that five of the ten tenured track professors left due to retirement or job transfers and the Department fired a number of staff members. They indicated that the retention numbers began to recuperate after the new faculty arrived during the 2013-2014 academic school year. They were unable to provide an explanation for the large number of nontraditional students leaving during the 2015-2016 academic term, but one professor indicated that enrollment was down institution-wide largely because the economy improved and many students returned to work.

The Biology Department indicated that it conducts exit surveys of undergraduates leaving the Department. However, neither the Chemistry nor Math Departments conduct such surveys. The Geology Department reported that during the review of course offerings and curriculum, the Department solicits

anonymous feedback from graduate and undergraduate students, but it is unclear whether they conduct exit surveys of departing or transferring students.

*c. Access to Campus Locations, Program Offerings, and Degrees*

1) **Campus Locations:** PSU is a single campus school covering 49 acres in the heart of downtown Portland and is easily accessible by public transportation. In student interviews, several students indicated that the school's central location was a primary factor in their choice to attend PSU over other Oregon and neighboring Washington state educational institutions.

2) **Program Selection and Course Availability:** During their interviews, most students indicated that there was adequate access to courses in their program of study. Several pointed out that more specialized courses in their program of study were only offered in a single session or during a specific term. Other students indicated that the courses were not offered in a way that permitted them to schedule classes exclusively in the mornings, evenings, or on particular days, thereby requiring them to come to classes nearly every day or to have long blocks of downtime between their classes. In addition, some faculty and advisor interviews indicated that certain courses required for program completion were only offered during alternating terms; thus, it was important for students to meet with an advisor and have an academic plan.

3) **Hours and Scheduling:** Both student and faculty interviews confirmed that the most flexible course options in terms of online, evening, and multisession courses were offered as electives in the 100- and 200-level programs. As such, these more flexible courses often were not part of a program of study requirement and opportunities to access flexible courses decreased as the course material became more specialized.

4) **Online Learning Opportunities:** PSU offers limited online learning opportunities in the sciences and student interviews indicated that the lab component and live class interaction were important aspects to the learning process, both of which would be significantly limited in an online course format. Several faculty members indicated that the programs are seeking ways to expand online learning opportunities within the science fields.

PSU offers an online master's degree, bachelor's degree, certificate, endorsement, or license in various curricula related to business, criminology and criminal justice, education, interdisciplinary studies, and social work.<sup>24</sup> Many of the features of these programs could serve as best practice models should PSU choose to expand their online course offerings to CLAS programs.

5) **Other Training and Customized Skills Workshops:** PSU offers a "Challenge Program," which permits high school students to take lower-level PSU courses and earn both high school and college

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<sup>24</sup> See, <http://www.pdx.edu/psu-online/>.

credit.<sup>25</sup> NASA interviewed a Challenge Program participant who began taking PSU courses at age 15 while in high school and as a result was able to enter PSU at age 18 with enough credits to be considered a sophomore.

PSU offers Continuing Education (CEED), which provides professional development and programs for teachers, school administrators, counselors, training professionals, and human service professionals.<sup>26</sup> In addition, the Geology Department offers courses and lectures to professional and amateur geologists, offers a continuing education certificate for hydrogeology, and—through the Senior Adult Learning Center (SALC)—permits Oregon residents aged 65 and over to audit any PSU courses at no cost on a space-available basis.<sup>27</sup> These programs demonstrate PSU's commitment to nontraditionally aged learners.

*d. Academic Advising*

The University has an Advising and Career Services (ACS) Department, which maintains a general page on advising for undergraduates and graduates.<sup>28</sup> While CLAS has an advising program open to all students, students are primarily referred to advising services within their major. The ACS website directs students to resources on how to locate their designated advisor and how to prepare for an advising session.<sup>29</sup> Students in online programs are advised to contact the specific program of study in which they are enrolled.<sup>30</sup>

Dr. Sukwkant Jhaj, Vice-Provost for Academic Innovation and Student Success, oversees PSU's four-year program, including academic advising in the University's 40-plus departments. He acknowledged that some departments have more active academic advisors than others. Dr. Jhaj stated that the school is currently overhauling its academic advising program on a continual basis with a focus on five or six programs each year. The overhaul will encompass hiring 12 professional advisors so students will have a designated academic advisor throughout their academic career, whether they change majors or enrollment status... a move that Dr. Jhaj feels will make academic advising more consistent and responsive to student needs.

Math instructor and undergraduate advisor Dr. Beatriz Lafferiere indicated that she works in cooperation with the CLAS professional advisors, explaining that she assists students specifically with

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<sup>25</sup> See, <http://www.pdx.edu/challenge-program/>.

<sup>26</sup> See, <http://www.pdx.edu/ceed/>.

<sup>27</sup> See, <http://www.pdx.edu/registration/senior-adult-registration>.

<sup>28</sup> See, <http://www.pdx.edu/advising/>.

<sup>29</sup> See, <https://www.pdx.edu/advising/home> and <https://www.pdx.edu/advising/advising-locations>.

<sup>30</sup> See, <https://www.pdx.edu/advising/home>.

math major requirements, whereas the professional advisors provide assistance to students on everything else. Like most faculty members interviewed, Dr. Lafferiere indicated that she maintains an “open door policy” rather than traditional office hours, permitting students to drop in without a prior appointment.

The Biology Department offers an expansive advising program with dedicated professional advisors for undergraduate, graduate, veterans, honors, and prospective biology students. Ms. Leah Tuor, Academic Advisor and Program Manager for the Department, stated that PSU has 1,300 declared Biology majors and, even with the dedicated advising program in the Biology Department, they have roughly four to five times more students per advisor than recommended by the national advising standards. Ms. Tuor stated that she takes advising appointments on a scheduled basis, and by walk-in, email, and phone.

Mr. Mark Woods, Chemistry Department Chair of Advising, stated that he meets with all chemistry students at least once per year to listen to their concerns and ensure they are aware that he is a resource to them. He added that all graduate students are paired with an advisor and that he views the student-advisor relationship as very important. Likewise, Dr. Dirk Iwata-Reuyl, Chair of the Chemistry Department, stated that he holds advising meetings with about eight to ten students per week and that, as a general rule, all department advisors try to avail themselves to students, including weekend and evening hours if necessary. He added that the Department uses DARS, a system that provides up-to-date information on student progress toward a degree. Students in their first year, including transfer students, are required to meet with an advisor and failing to do so can result in the inability to register for a second year.<sup>31</sup>

Undergraduate students within the Geology Department are assigned to one of two advisors based on their last name and all graduate students are assigned to a single advisor. Dr. Martin Streck and Dr. Ben Perkins both serve as advisors, advising undergraduate students on how and when to take specific geology courses. If the student has additional questions regarding general courses, the two advisors direct them to speak with the University’s professional advisors. They both stated that they generally meet with students in person after coordinating the meeting via email. Dr. Perkins noted that questions related to course track plans and general advising are better suited for in-person meetings.

All of the advisors interviewed indicated that they were not available on evening and weekends for advising, but were frequently available via email to address student concerns or schedule appointments. With the exception of professional advisor, Ms. Tuor, all advisors indicated that their advising training largely consisted of how to navigate the advising system, assist students with registration, and prepare a course track plan for students. Some, but not all advisors, received training on assisting students from diverse demographic groups. All advisors are invited to regular training sessions hosted by Mr. Robert Mercer, Assistant Dean for Advising, however attendance is not mandatory.

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<sup>31</sup> See, <https://www.pdx.edu/advising/first-year-mandatory-advising-requirement>.



*e. Administrative Services: Admissions, Registrar, and Financial Aid*

1) Admissions Office: The Admissions Office has regular office hours, but also has a robust website for admissions, obviating the need for in-person access. Should students require personal assistance, PSU's web tool connects students to admissions counselors located near their residence.<sup>32</sup> PSU admissions counselors host college fairs throughout the Northwest region.<sup>33</sup> In addition, the Biology Department conducts preadmission advising for students at nearby community colleges.

Individual departments do not participate in undergraduate student admissions or the selection process, as the University Admissions Office handles this exclusively. Graduate admissions are handled by the Graduate Admissions Committee (GAC), which leads recruitment initiatives, reviews applications, and makes acceptance decisions. Former GAC Chair Dr. Niles Lehman noted that the school has no specific outreach to nontraditionally aged students, but stated that the school markets to a wide range of students to get as many applicants as possible. Dr. Lehman added that the applications for admission do not specifically capture applicant age, work experience, or familial status and these factors are not considered in admission. He also added that nontraditionally aged students are not disadvantaged by large gaps in time away from school, provided they can demonstrate that they enriched their knowledge in some way during that time.

Mr. Mark Woods, also a member of the GAC, noted that age, family status, military experience, and locality had no bearing on admissions. He added that all votes on admission come to a consensus, thereby airing and resolving any kinds of subtle biases that may come out during group discussions.

PSU policy requires all undergraduate students to attend one of three orientation sessions for general admission, transfer, or honors students prior to registering for classes. Upon admission, graduate students are required to attend an extensive orientation weekend where they are partnered with mentors and advisors. During student interviews, however, it was clear that this was not the case, as many graduate students either did not attend orientation or had none available to them in their graduate programs.

2) Registrar/Enrollment/Ongoing Course Selection: A robust online portal called "Banweb" permits students to register for classes, order transcripts, and change their major online. The site also houses the course catalog, class and final exam schedules, and provides students access to grades and graduation requirements.<sup>34</sup> During registration, online registration is available 24 hours a day and 7 days per week and closes for brief maintenance on Sundays. The website also provides students with specific email addresses for communications regarding registration, transcripts, degree requirements, and

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<sup>32</sup> See, <http://www.pdx.edu/admissions/admissions-counselors>.

<sup>33</sup> See, <http://www.pdx.edu/admissions/college-fairs-and-high-school-visits>.

<sup>34</sup> See, <http://www.pdx.edu/registration/>.

veteran's certification. Finally, the student handbook contains an illustrated, step-by-step guide to registering for classes online.<sup>35</sup> The extensive website obviates the need to visit the Registrar's Office in person. However, the Office of Registration and Records keeps regular business hours and extends them for the first week of each term.<sup>36</sup>

Admitted undergraduate students are permitted the flexibility to change majors during the course of their academic career without any change to their admission status. Successfully admitted graduate students are provided with designated advisors from the GAC Committee, a graduate research advisor, and doctorate or thesis advisor. Both undergraduate and graduate students are permitted to change to part-time status or take a leave of absence without any change in admission status. However, PSU academic policy dictates that completed undergraduate coursework is valid for seven years and Ph.D. students are limited to a total of 14 years to obtain their degree.

Students interviewed indicated that PSU and CLAS were supportive of part-time students and that the process was simply to register for fewer classes, resulting in their student fees and financial aid automatically adjusting for that term. Likewise, if students desired to change from part-time to fulltime status, they simply registered for more classes.

3) Financial Aid: The Office of Financial Aid provides an online roadmap for all types of students and their parents and provides access to financial aid forms and the PSU scholarship database. For in-person service, the Financial Aid Office keeps regular business hours. Dr. Jhaj stated that the school is focused on creating "coordinated efforts" that allow students to better connect with various offices, like Financial Aid, without having to visit the office or stand in line.

Students indicated that they were able to effectively access most information that they needed regarding financial aid via the school's portal and website. Several students indicated that there was a lack of scholarships available to offset the increasing cost of education. A noted barrier to the decision to change to part-time status indicated by students was the significant impact to financial aid, as most scholarships and services required students to be enrolled fulltime to receive funding or services.

*f. Career Services:*

Students indicated that they felt that both traditional and nontraditional students had equal access to career development services, although some added that the limited hours might make it somewhat difficult for students who work and attend classes to take advantage of the services.

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<sup>35</sup> See, 2015-2016 Student Handbook, pp. 28-31.

<sup>36</sup> See, <http://www.pdx.edu/registration/contact>.

*g. Childcare, Programs for Children not of School-Age, Pregnancy, & Lactation support:*

The Resource Center for Students with Children (RCSC) is a student-fee-funded program developed four years ago, and recently expanded as a result of a task force study that showed that at least 20 to 25% of students have dependent children. The largest areas for requested services from parents with children involved finances, childcare, and work-life balance. In response, RCSC offers a number of supportive programs such as advocacy services, pregnancy and lactation accommodations, mentors, welcome and new parent bags, computer labs, a family room, indoor play places, a map of family-friendly spaces on campus, a food pantry, assistance with food stamps, a clothing closet for children, and hosts several family-oriented events. An additional goal of RCSC is to support students with children in achieving life balance while pursuing their education goals.

Childcare services are available to all students, regardless of age or fulltime or part-time status. In an average week, there are about 50 students utilizing the services, with the average students being nontraditional students with children under the age of five. PSU provides several week-day on-campus childcare options for children of students, staff, and faculty, some with hours as late as 7:30 p.m. To be eligible for services, students must take a minimum number of credits (8 for undergrads and 5 for grads). Costs vary by child age and number of days requiring care, but there are some subsidies available. RCSC also provides an online list of off-campus childcare and babysitting resources for children of all ages.<sup>37</sup>

PSU offers eight lactation spaces throughout the campus for students, staff, and visitors. Each space differs with respect to hours and amenities; however, the website lists location, amenities, and hours for each space.<sup>38</sup>

Interviews with RCSC staff revealed that their biggest challenges are providing more childcare slots for infants, more lactation support services, and a children's indoor play area for winter months. RCSC staff noted that there are too few lactation rooms in the areas of the science buildings and suggested increasing the number of rooms on this part of the campus.

RCSC staff indicated that, despite numerous services available, their office is unable to reach all of its target audience for a variety of reasons, including lack of data on potential student customers with children (as it is not reported) and lack of access during student orientations to raise awareness of services. RCSC staff suggested allotting time during orientation for a presentation on RCSC programs and/or providing information on course syllabi concerning RCSC as a resource for emergency childcare options and pregnancy and lactation advocacy.

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<sup>37</sup> See, <http://www.pdx.edu/students-with-children/off-campus-childcare>.

<sup>38</sup> See, <http://www.pdx.edu/students-with-children/lactation-spaces>.

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During student interviews, students expressed a high level of awareness about programs and services available for students with children and the programs seemed to be well utilized and well received by most. However, there were a few students who were not aware of the availability of emergency childcare services who thought those services would be helpful to them.

### *h. Commuter Services*

NASA submits that in the majority of instances, nontraditionally aged students will be more likely to be commuters than housed on campus. PSU estimates that more than 40 percent of all student and employee trips to the campus are made via public transit. As such, the University has an Urban Plaza, which serves as a central public transit nerve center with the city streetcar passing diagonally through the plaza, along with the numerous bus stops and three rail lines.

PSU provides reduced rate passes and online route planning for Portland's public transit system, parking permits, and information on parking garage fees and locations throughout campus, carpooling, car sharing, and bike park resources.<sup>39</sup> PSU students can use the entire Portland streetcar system for free.<sup>40</sup>

A number of students interviewed had commutes of over an hour from destinations like Washington State. Despite this, some still felt that the proximity of a student's residence to campus had very little effect on student academic success as compared to the individual student's motivation. By and large, students stated that their commute primarily impacted their course scheduling and participation in study groups and extracurricular activities.

### *i. Health Center Services*

The Center for Student Health and Counseling (SHAC) keeps regular business hours and provides mental health, physical health, dental, acupuncture, and testing health services to students for a mandatory Student Health fee, unless a waiver is requested. After-hours needs are met by an Advice Nurse or 24/7 mental health crisis service via Multnomah County.<sup>41</sup> Students can manage information and services online. All students are also offered three free visits per academic term to the University's Mind Spa, a space dedicated to light therapy, meditation, biofeedback, yoga, and massage.<sup>42</sup> PSU does not offer an emergency care or after hours' clinic. Information was not readily available as to whether the student health insurance provided coverage for spouses or children of students.

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<sup>39</sup> See, <http://www.pdx.edu/transportation/>.

<sup>40</sup> See, 2015-2016 Student Handbook, p. 44.

<sup>41</sup> See, <http://www.pdx.edu/shac/> and <http://www.pdx.edu/shac/eligibility-for-services>.

<sup>42</sup> See, <http://www.pdx.edu/shac/mind-spa>.

Interviewed students indicated that health services were equally available to both traditional and nontraditional students.

*j. Student Housing*

The University's housing website states that, "Families are welcome in University Housing. We have many one bedroom apartments and a limited number of two bedroom apartments on campus to accommodate families." No further information regarding the location, number of available apartments, or approval process was available.<sup>43</sup>

Ms. Michelle Toppe, Dean of Students and Vice-President of Student Affairs stated that, as the traditional student population grows, PSU is starting to build more traditional-style dorm rooms with shared kitchens and bathrooms. She also indicated that PSU offers apartment-style housing for adult students and students with children. She also noted that the RCSC recently received a grant to provide full financial and some social support to a select number of families living on campus.

During interviews, students indicated that they were aware of the University's housing options for families, but most felt that they were cost prohibitive and not conducive to family-oriented lifestyles. Many students indicated that the family housing was not segregated from regular student housing and the environment was not quiet or family friendly. Another issue frequently raised was that all on-campus housing packages were automatically bundled with a student meal plan, which significantly added to the cost for students not desiring this option.

*k. Other Student-Fee-Funded Resources*

PSU provides a host of student-fee-funded resource centers that show support for student academic success and work-life balance. The Women's Resource Center and Veteran's Resource Center are designed to support nontraditionally aged students.

PSU's Women's Resource Center ("WRC") is a student-fee-funded program. The WRC comprises five professional positions: Interim Director, Assistant Director, Administrative Coordinator, Sexual Response Coordinator, and Empowerment Program Coordinator, three front desk leads (marketing, graphic design), and a Master's of Social Work. They also have 10 (soon to be 20) peer advocates. The WRC offers services in two main areas: the Interpersonal Violence Program, which provides 24-hour response to sexual violence on campus, stalking, and domestic abuse; and the Empowerment Program, which is aimed at serving nontraditionally aged students (22 and older) and helping provide a bridge between time away from school and becoming a student again. The Empowerment Program offers a college success course, one-on-one advising, and a women's mentorship program.

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<sup>43</sup> See, <http://www.pdx.edu/housing/>.

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Interviews with WRC staff revealed that their office interacts with two to six students per week and that most are nontraditionally aged students with a variety of requests including financial needs, housing, and trying to make connections.

WRC staff members attend functions and tables at community colleges to assist students with transition. They would like to coordinate efforts between PSU and the Portland Community College WRC. They also conduct scholarship workshops specifically designed and marketed toward nontraditional women returning to school.

PSU's Veterans Resource Center (VRC) has been in existence for three years. It is a student-fee-funded service geared to the approximately 500 student veterans, active duty, reservists, and their family members. It comprises one professional staff member and five work-study students. The VRC interacts with nontraditionally aged students at least 60% of the time because most vets are at least age 27. They service approximately 30 to 40 people each fall and winter, but in spring and summer terms they have fewer requests.

According to VRC staff, the VRC's main role is to assist veterans in their transition between active duty and student. They work with vets to make sure they are up-to-date on all services that are available to them and also offer services or refer vets to outside organizations, when necessary, to assist with receiving college credit for military training, resume writing, retraining for workforce, employment, housing, transportation, mental health, and/or counseling. They provide comradery and a safe environment for vets. They also assist faculty in dealing with issues arising in the teaching of veteran students.

The VRC interacts with several other offices and resource centers to provide the best services to vets. For example, they have a work-study student who works both at VRC and the Women's Resource Center to bridge the two offices and provide better services to women vets. They work with the Disability Resource Center for test-taking anxiety issues and the Queer Resource Center as they have three transgender vets. The VRC is currently seeking information via survey to learn the best methods of communicating with veterans to keep them informed about events and services on campus.

Most students interviewed were aware of services offered by the various resource centers and some regularly utilized them. Students interviewed stated that both traditional and nontraditional students have equal access to campus organizations and activities. Many nontraditional students indicated that they did not participate in campus extracurricular activities, largely due to time demands, as well as work and family obligations. Nontraditional students involved in campus activities indicated that they often have different reasons for involvement in activities and felt that traditional students often were seeking to build their resume, whereas they had a genuine interest in the subject or focus of the activity.

During interviews, several faculty members, and NASA grantees specifically, indicated that they routinely allowed interested individuals between the ages of 15 to 70 to work as research

assistants in their labs, including high school students. However, some students raised concerns that selections for research and teaching assistant opportunities were potentially biased toward students in their mid-twenties and the selection process was not transparent.

### *1. Website Experience and Functionality*

NASA assumes that a significant portion of information disseminated about the school's, programs, assistance, and amenities is channeled to current and prospective students through its website and online tools. Some students indicated that they received information on navigating the school's website during orientation, while others indicated that they did not. Thus, it is unclear if students unfamiliar with services offered failed to remember, if the web training was not consistently included in student orientation, or if there was another cause. Overall, students said that they felt they received sufficient support to utilize PSU's student databases and online portals, including Banweb, D2L, and DARS. They felt that they were able to effectively accomplish most anything online with respect to registration and financial aid.

Many students expressed overwhelming frustration with the PSU website. Most felt that the site contained a large amount of information, but felt that it was extremely difficult to find information, even when utilizing the site's search function, which students described as useless and counterintuitive. Many indicated that they often conduct an external "Google" search to find the information needed on the PSU website. This was consistent with NASA's notes on the website.

Social Media: The overwhelming majority of students indicated that while they used social media to connect with friends and family, they were not particularly interested in utilizing it as a means to stay connected with the school. Those students who connected with PSU's social media accounts, connected only with a particular department or club that they were involved in, rather than with the University as a whole.

## **2. Recommendations**

- a. **Improved Information on Departing or Transferring Students.** Departments in CLAS may wish to follow the lead of the Biology Department and conduct exit surveys from departing or transferring students to understand and potentially address the reasons for student departures.
- b. **Greater Emphasis on Expansion of Educational Program Delivery.** PSU may wish to consider expansion of its educational programs to include greater emphasis on course offerings that are available online, on weekends, or in the evenings. Additionally, courses could be available via videoconference. In taking steps toward policy changes along these lines, the University may wish to consider a thorough institution-wide review of access to programs and services, including a survey of students with responses broken down by age, full- or part-time status, and other demographic categories. The driving factor in such a review would be to better determine whether additional efforts should be undertaken to make educational programs and services

more accessible. Such efforts may be appropriate in both the undergraduate and graduate settings.

- c. ***Students with Children Services.*** Pregnancy and lactation advocacy and childcare services may be particularly important to the nontraditionally aged student. PSU may consider expanding its existing on-campus childcare options and hours, as well as improve information dissemination about its childcare resources, including a blurb or widget on course syllabi for courses. PSU may also consider increasing the number of lactation rooms in the science areas of the campus.
- d. ***Website Experience.*** The University may wish to consider revising the search and contact features of its website to make it more intuitive, user-friendly, and connected. This would serve to bolster its online presence and encourage students, of all ages, to seek further information about the University to determine if it offers the programs that will best meet their needs.

### 3. Promising Practices

- a. ***General Access to Services.*** The University demonstrates its commitment to all students and makes a substantial effort with respect to nontraditionally aged students by providing a broad range of information and services online and during nontraditional business hours.
- b. ***Commitment to Students with Children.*** PSU offers a variety of services to students with children, including all services described herein, as well as a family commencement, where children are invited to cross the stage with the graduating parent.
- c. ***Resource Centers.*** PSU displays a commitment to the nontraditionally aged learner through its implementation of student-fee-funded groups such as the Women’s Resource Center and the Veterans’ Resource Center, both of which have demonstrated achievement of supporting women and men returning to education.

### III. CONCLUSION

Based upon its limited scope review, NASA finds that PSU is in compliance with Age Act regulations. In fact, there are many strengths in PSU's programs regarding Age Act compliance.

With respect to admissions, outreach, and retention, the University does not require transfer students, or students who have been out of school for more than one year, to submit SAT/ACT scores. In addition, the University attempts to show diversity of the student population through visual imagery on its website depicting the presence and participation of adult learners in both undergraduate and graduate studies. Importantly, the University appears to make efforts to help students succeed, regardless of age or other demographic category, by offering systems and programs to support recruitment and retention to students and prospective students. Finally, the University has shown a demonstrated commitment to



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nontraditionally aged learners through its University system of schools and programs, alternative schedules, online learning, and lifelong learning.

In terms of areas for improvement, NASA recommends that the University enhance its civil rights informational and training materials to make clear the existence of Age Act laws, clarify the application of the Age Discrimination Act, and provide practical examples of how the Act may affect the University. NASA also recommends that the University clarify and disseminate adequate information about its internal discrimination complaints policy and procedures, including rights, obligations, timelines, and other potential external remedies. To this end, appropriate language and links on relevant student and faculty webpages and in student and faculty handbooks is imperative.

In addition, PSU and CLAS may wish to consider broader changes to institutional policy that would expand access for nontraditionally aged learners to its programs and services through expanded nighttime and weekend course offerings, and alternative forms of program delivery (*e.g.*, greater focus on online platforms and videotaping). While the Age Discrimination Act does not require affirmative efforts that may facilitate education for nontraditionally aged (and other) students, such efforts are entirely consistent with the purpose and intent of the Act and NASA's implementing regulations.