



**AMERICANS WITH DISABILITIES ACT**  
**Policy and Procedure Guide**

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◆ **Purpose of this Guide**

This Guidebook is intended to facilitate compliance with Section 504 of the Rehabilitation Act of 1973 and Title III of the Americans with Disabilities Act (ADA) of 1990 at the Adler School of Professional Psychology and is considered the official policy of the institution. The guide is to be kept as a reference in dealing with students requesting accommodations. This guide provides procedural information and guidance to assist campus staff in providing reasonable accommodations to qualified students with disabilities.

◆ **Director of Student and Alumni Affairs**

The Director of Student and Alumni Affairs (DSAA) will facilitate the implementation of accommodations at the Adler School of Professional Psychology.

◆ **Policy**

There are two federal laws prohibiting discrimination against students or prospective students with disabilities. Those laws are Section 504 of the Rehabilitation Act of 1973 (“Section 504”) and the Americans with Disabilities Act (“ADA”). These two federal laws are similar in their substantive requirements. They apply to all aspects of the Adler School’s operations, including academic programs, co- and extracurricular activities, admissions, student services, facilities, and so forth.

In addition to prohibiting discrimination on the basis of disability, Section 504 and the ADA both impose an affirmative obligation on the School to provide adjustments, modifications, auxiliary aids and services, and other reasonable accommodations needed by an otherwise qualified student with a disability to enable that student to participate in the school’s programs and activities – as long as those accommodations do not impose an *undue burden* on the school, and/or fundamentally alter the nature of the service, program or activity provided.

It is the policy of Adler School to make every reasonable effort to provide qualified students with disabilities with the opportunity to take full advantage of its programs, activities, services and facilities. The DSAA does this, in part, by arranging specific accommodations for students. To request accommodations, students with disabilities should provide the DSAA with current documentation of their disability, the functional limitations resulting from the disability, and recommendations for specific accommodations. The DSAA and the student will work together to identify appropriate academic adjustments, auxiliary aids and services, and/or other reasonable accommodations that may be warranted under the particular circumstances.

The Adler School has the right to establish qualifications and other essential standards and requirements for its courses, programs, activities, and services. All students are expected to meet these essential qualifications, standards and requirements, with or without reasonable accommodations.

## ◆ **Model of Compliance**

While every situation of student accommodation is unique, Adler School has established a general model of compliance with distinct phases.

### **INITIATION OF THE ACCOMMODATION PROCESS**

The student initiates the process by self-disclosing his or her disability and requesting accommodation from the DSAA. To do this, the student should fill out the ADA Self-Disclosure Form available online at [www.adler.edu](http://www.adler.edu). Students will need to turn in documentation of their disability. The documentation must contain a current report or evaluation prepared by a physician or other appropriate licensed professional that describes the student's disability with sufficient clarity so as to allow Adler School staff to make informed decisions about reasonable and appropriate accommodations.

All faculty and staff should be instructed to direct any student requesting accommodations to the DSAA and to keep such a disclosure confidential. The student is also instructed to bring any existing supporting documentation of his or her disability at that time.

### **INITIAL CONSULTATION**

The student meets with the DSAA. This meeting (or series of meetings) should have the following outcomes:

- Existing documentation reviewed; and determination of whether more documentation will be required.
- Identification of the nature of the student's functional limitations and how those limitations may impact his/her activities at the school.
- Student proposes appropriate accommodation.

This meeting should always take place in-person. In exceptional circumstances, a telephone conference may be arranged.

The goal of this process is to ensure equality of access and opportunity for students with disabilities. It is important to remember that a specific accommodation requested by you or recommended by your evaluator, even if clinically supported, may not be the most appropriate accommodation given the requirements of your academic program. Consequently, you may find that, in light of our considerable experience, other accommodations may be proposed to you that neither you nor your evaluator requested.

## **DOCUMENTATION**

A student requesting accommodation must supply documentation of a disability as that term is defined by the ADA and Section 504. Documentation signed by a licensed health care professional that adequately describes the nature of the disability and the limitations resulting from it and is based on an **assessment made in the last three years** is required. In cases of disabilities where the impact on the learning environment is not easily determined (such as learning disabilities or mental illness), more detail is required and should include the professional's recommendations regarding the types of accommodations that would be appropriate. Examples of appropriate professionals are medical doctors, clinical psychologists, or psychiatrists.

If a student does not have appropriate documentation, it is the student's responsibility to obtain it, at the student's expense. Persons employed by the Adler School of Professional Psychology should not be used as healthcare providers for this purpose. The report from the healthcare provider must be included with the Verification of Documentation of a Disability Form.

## **IDENTIFYING REASONABLE ACCOMMODATIONS**

After sufficient documentation has been provided, the DSAA initiates a discussion with the student regarding reasonable accommodations. The goal of reasonable accommodation is to enable the student to meet the learning objectives of the degree program without placing an *undue* burden on the campus and without sacrificing the content and the objectives of particular courses and training events. An accommodation focuses on removing barriers that may prevent a student from meeting those objectives, or focuses on allowing the student to prove that the objectives have been achieved in another way. Accommodations do not make course work easier for students with disabilities than for the general student population; they simply make equivalent learning opportunities available. The best starting place is simply to ask the student what he or she feels is a reasonable accommodation, and then investigate the practicality and the ramifications of the student's suggestions. The Director of Student and Alumni Affairs may also review the documentation of the student's disability to see what recommendations it includes for accommodations.

## **CONFIRMATION OF ACCOMMODATION**

The confirmation of accommodation does not need to take place in person. It can be completed by telephone, e-mail, or whatever method works best in that situation. The DSAA offers an appropriate and reasonable accommodation to the student by completing a Confirmation of Accommodation Form. If the student does not agree with the accommodation, an additional meeting should be scheduled to see if a compromise solution can be worked out. If the student does not agree with the accommodation after additional discussion, the student can meet with the Director of Alumni and Academics Affairs or a Vice President at Adler School to appeal the

decision. If student accepts all accommodations, both the DSAA and the student will sign the Confirmation of Accommodations Form.

### **COMMUNICATION OF ACCOMMODATION**

The ADA Confirmation of Accommodation Form will be kept on record (together with all related documents) by the DSAA. The student is given a copy of the Confirmation of Accommodation Form and a letter and it is his or her responsibility to provide copies to his/her instructors. Unless given specific permission by the student, the DSAA should not discuss the accommodations with other campus personnel, except for the School President and except for persons who have a legitimate need to know in order to carry out their duties on behalf of the school.

### **ARRANGEMENT OF ACCOMMODATION**

It is the student's responsibility to set up the agreed-upon accommodations with his or her instructors. The DSAA assists the student in arranging the accommodations and is responsible for ensuring that all necessary accommodations have been procured. If outside services or equipment are necessary (e.g., specialized computer equipment or sign language interpreters), it is the school's responsibility to secure the necessary items.

### **RECORD KEEPING**

The DSAA creates and maintains an ADA accommodation file for each student requesting an accommodation. The file should include documentation of the student's disability, ADA Accommodation Self-Disclosure Form, Confirmation of Accommodation Forms, and all other correspondence and paperwork regarding the student's accommodation(s). This file will be kept separate from the student's academic file.

#### **◆ Accommodation Timeline**

The amount of time required to assess accurately the nature of a student's disability, and the functional limitations arising from the disability, examine existing documentation, receive more documentation (if necessary), discuss the proper accommodation and make arrangements for accommodation is highly variable. It is imperative that timeliness in responding to a student's request for accommodation be respected.

#### **◆ Confidentiality/Delegation of Responsibility**

The self-disclosure and accommodation process must be carried out as confidentially as possible. The student does not have to discuss the reasons for the accommodation with any faculty or staff member of the institution beyond the DSAA.

#### **◆ Qualifying Exams**

Students can request special accommodations for their qualifying exams to the DSAA.

◆ **Practicum and Internship**

The need for accommodations during practica and internships should be considered at the first meeting between the student and the DSAA. The DSAA will explore and identify training sites accessible to students with disabilities. Upon request, the DSAA informs the student regarding the availability of accommodations in the training sites identified by the student.

The DSAA's recommendations for practica and internship accommodations are provided in writing to the student in the same manner as all other accommodations. Any complaints or concerns that the student has regarding the training site's compliance with the approved accommodations should be promptly communicated by the student to the DSAA.