



# **AMERICANS WITH DISABILITIES ACT**

## **Policy and Procedure Guide**

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## **Purpose of this Guide**

This handbook 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 Adler University and is considered the official policy of the institution. This guide provides procedural information and guidance to assist campus staff in providing reasonable accommodations to qualified students with disabilities.

### **Associate Vice President of Student Affairs**

The Associate Vice President of Student Affairs (AVPSA) will facilitate the implementation of accommodations at Adler University.

### **Policy**

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

In addition to prohibiting discrimination on the basis of disability, Section 504 and the ADA both impose an affirmative obligation on Adler University 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 Adler University’s programs and activities – as long as those accommodations do not impose an undue burden on Adler University, and/or fundamentally alter the nature of the service, program or activity provided.

It is the policy of Adler University 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 AVPSA does this, in part, by arranging specific accommodations for students. To request accommodations a student with disabilities should provide the AVPSA with current documentation of the disability, the functional limitations resulting from the disability, and recommendations for specific accommodations. The AVPSA 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. Adler University 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 AVPSA. To do this, the student will complete the Student with Disability Request for Services Agreement available on the [Adler Connect Portal](#) accompanied by documentation of the 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 AVPSA and to keep such a disclosure confidential.

### **INITIAL CONSULTATION**

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

- Review of existing documentation 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 Adler University.
- Proposal of appropriate accommodations

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 a student or recommended by the student's evaluator, even if clinically supported, may not be the most appropriate accommodation given the requirements of an academic program. Consequently, students may find that, in light of our considerable experience, other accommodations may be proposed that neither the student nor the 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.

It is the student's responsibility to obtain appropriate documentation at her/his own expense. Persons employed by Adler University should not be used as healthcare providers for this purpose.

## **IDENTIFICATION OF REASONABLE ACCOMMODATIONS**

After sufficient documentation has been provided, the AVPSA 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 Associate Vice President of Student 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 will be provided in person during the meeting with the AVPSA. If the student has any concerns regarding the accommodations identified then an additional meeting may be requested. If the student does not agree with the accommodation after additional discussion, the student can appeal the decision, in writing, to the Vice President of Administration. If student accepts all accommodations then a letter will be created for the student to share with their faculty as they choose.

## **COMMUNICATION OF ACCOMMODATION**

The student is given a letter that outlines all accommodations and it is his or her responsibility to provide copies to his/her instructors. Unless given specific permission by the student, the AVPSA should not discuss the accommodations with other campus personnel, except for persons who have a legitimate need to know in order to carry out their duties on behalf of Adler University.

## **ARRANGEMENT OF ACCOMMODATION**

It is the student's responsibility to set up the agreed-upon accommodations with his or her instructors. The AVPSA 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 Adler University's responsibility to secure the necessary items.

## **RECORD KEEPING**

The AVPSA creates and maintains an ADA accommodation file for each student requesting an accommodation. The file should include documentation of the student's disability, Student with Disability Request for Services Agreement 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, identify 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. The student is also responsible for requesting accommodations in a timely fashion as accommodations cannot be enacted retroactively.

## **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 AVPSA.

## **Qualifying Exams**

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

**Practicum and Internship**

The need for accommodations during practica and internships should be considered at the first meeting between the student and the AVPSA. The AVPSA will encourage the students to consider how they plan to request their accommodations from the Training Department as well as with the site(s) they are considering for practicum or internships. Requests for accommodations on practicum and/or internship will need to be made to the Training Department and to the site directly. The provision of accommodations will be made by the practicum site and/or internship site.