

**Disability Services for Students**  
ADA-504, Title III  
**POLICIES & PROCEDURES**  
*For*  
**OTTAWA UNIVERSITY**  
October 2013

*These policies and procedures/roles and responsibilities are to be provided to all administration, faculty, staff, and students, particularly those students requesting disability-related accommodations. Please note that OU's office of Human Resources handles ADA-related services for employees with disabilities.*

## **KEY ROLES AND RESPONSIBILITIES**

**University ADA Coordinator:** Oversees and evaluates disability services for students throughout the University system; monitors the institution's compliance with the law; assures consistency among the units in providing accommodations; resolves disputes or grievances relevant to disabilities and accommodations; continuously updates disability services policies and procedures; and reviews "Master Plan" documents to assure continual commitment to improving accessibility within the University's physical facilities.

**Disabilities Services Coordinator (DSC):** Maintains and oversees the evaluation of disability documentation for his/her unit; works with faculty and administrative personnel to determine reasonable accommodations for individual students; ensures provision of those accommodations in classrooms, in residence halls, during testing, etc.; and provides information to faculty on universal design for classroom teaching and pedagogical materials. A Disabilities Service Coordinator is identified for each academic unit of the University.

## **POLICIES AND PROCEDURES**

### **1. THE INSTITUTION'S BROAD RESPONSIBILITIES:**

In accordance with Section 504 and Title III of the ADA, and in fulfilling its mission as a private Christian liberal arts university, Ottawa University provides reasonable accommodations in order to prevent discrimination on the basis of disability. All administrators, staff, faculty, and students adhere to the philosophy of equal access to opportunity. All members of the OU community are responsible for contributing to the implementation of these ADA-504 policies and procedures.

Contact information for personnel designated ADA Coordinator and Disability Services Coordinators is provided on the institution's internet home page.

The *reasonableness* of accommodations is determined with two points of view in mind: that of the student, and that of the institution. Accommodations are reasonable when they effectively address equal access to programs for the student, as well as remaining within the fiscal capacities and curricular requirements of the institution.

### **2. INITIATION OF CONSIDERATION FOR ACCOMMODATIONS**

Students with disabilities must initiate their consideration for accommodations by first declaring their disability in writing (on paper, not electronically) **and** providing appropriate documentation to the campus's Disabilities Services Coordinator. Notification to other offices (Admissions, Student Life, etc.) does **not** constitute an official declaration of disability. While parents, faculty, and advisors may have crucial information to contribute to accommodation design, ultimately, it is the student's own responsibility to initiate—in written form—his/her consideration for receiving services.

### **3. FORM OF DOCUMENTATION & MAINTENANCE OF INDIVIDUAL RECORDS**

The requirement for documentation has two purposes: first, to establish that the individual is a person with a disability, and second, to establish that the person has a related need for accommodation. Federal law mandates that Ottawa University ensure equal, nondiscriminatory access to its programs, and the requirement for documentation helps OU meet that demand.

Documentation must:

- Confirm the existence of a disability to afford the promise of nondiscrimination;
- Demonstrate that the physical, mental health, or learning disability creates a substantial limitation to a major life activity to establish eligibility for protection under the law (functional limitations);
- Establish a current need for accommodation (recency of documentation: The DSC will use his/her discretion in determining, case-by-case, whether the age of documentation of the student's disability is relevant in establishing current need);
- Be provided by an appropriately credentialed professional (The DSC and the ADA Coordinator will use their common sense and good judgment in instances of obvious disability.)

Documentation will be placed on file in the office of the Disabilities Services Coordinator, who will ensure their security and confidentiality. If necessitated by the transient or changeable nature of a disability, the DSC will obtain updated documentation to ensure continuing eligibility for services.

The specific parameters of documentation must be determined on a case-by-case basis, and services are provided consistent with the sort of documentation on file. Increased levels of documentation may allow better flexibility in types of accommodations authorized. At the very least, documentation must meet the conditions listed above.

#### **4. AUTHORITY FOR DETERMINING ACCOMMODATIONS**

The Disabilities Services Coordinator is authorized to determine appropriate and reasonable accommodations plan, in consultation with the appropriate unit personnel and the ADA Coordinator. The ADA Coordinator will approve or deny all requests for accommodation.

#### **5. PROCEDURE FOR REQUESTING AND RECEIVING ACCOMMODATIONS**

The request for accommodations must be initiated *by the student in writing* to the unit's Disability Services Coordinator. The full process is as follows:

- The student completes and submits a Request for Services Form (available from the DSC).
- The student provides the DSC with appropriate documentation of his/her disability provided by an appropriately credentialed professional.
- The DSC determines the legitimacy of the documentation. In collaboration with the faculty affected, the DSC will establish a suggested accommodations plan. The evaluation and planning process should take a maximum of one week. Students are advised to initiate the process in four weeks in advance of the semester in which accommodations are needed.
- The student meets with the DSC to discuss the suggested accommodations plan, and to make adjustments based on current needs. Substantial changes to the plan require authorization by the ADA Coordinator.
- The student initiates meetings with the DSC as needed to update the accommodations plan.
- Faculty are notified of the need for classroom or materials accommodations as follows:
  - Once the accommodations plan has been developed, the DSC drafts a letter outlining accommodations appropriate to each faculty member's course, and attaches to the letter a blank confirmation receipt.
  - The student hand-delivers the accommodations letter and blank receipt to the appropriate faculty person.
  - The faculty person returns the completed confirmation receipt to the DSC.

The student is responsible for meeting with the faculty person well in advance of tests or other occasions when accommodations are authorized. For instance, students requiring extra time to complete exams will make a testing appointment with the instructor. Instructors should be given at least a week's notice of need for such accommodations.

If accommodations are NOT provided as agreed, the student will report directly and immediately to the DSC, who will then re-negotiate with the faculty person in question. The student is advised NOT to sit for exams or participate in activities for which accommodations have been requested in advance, and promised, but not provided.

Each student is entitled to involve his/her family and other supports in the process of determining accommodations; however, the student must be present at any discussions regarding the student and his/her accommodations.

The responsibilities for providing accommodations mainly lie with the DSC, but the DSC will collaborate with the faculty person to negotiate for alternative testing space, additional time for testing, note taker services, etc. When costs are associated with an accommodation that has been determined reasonable, the unit will cover those costs unless exempted by the Vice President for Business.

## **6. ENSURING CONFIDENTIALITY**

In accordance with the Family Education Rights & Privacy Act of 1974 (FERPA), Ottawa University keeps all student records confidential, including records pertaining to disabilities. Those faculty members who have a legitimate educational interest in a student's records are entitled to specific and limited access to information. While a student's specific diagnosis is usually unnecessary to establishing equal access to learning experiences, some knowledge of functional limitations can be quite helpful. If the DSC considers information exchange to be potentially valuable, he/she will obtain written consent from the student for permission to share specific pieces of information. NOTE: As in any service context, confidentiality is waived if a student seems to be a threat to him/herself or to others.

## **7. COURSE SUBSTITUTION REQUESTS**

Course substitutions are considered a last-resort effort to provide equal access, because such substitutions have the potential of compromising the integrity of the school's curriculum and degree-granting authority. Judicious review of such requests requires the following information be provided.

- Disability documentation
- Evidence of disability-related need for substitution
- Justification of the request as reasonable (from both the institution's and the student's point of view)

The Provost/Director or the Academic Dean must clear course substitutions; steps for review are as follows:

- The student initiates the process by submitting a written request to the Disabilities Services Coordinator for a course substitution as a disability accommodation.
- The DSC determines in consultation with the ADA Coordinator that a course substitution may be appropriate.
- The DSC provides a written rationale for course substitution for review by the Provost/Director or the Academic Dean.
- The Provost/Director or Academic Dean reviews the request and determines whether to approve the substitution.
- If authorized, the Provost/Director or Academic Dean forwards the course substitution to the Registrar's Office to be filed with the student's graduation contract.
- Students contesting the results of the Provost/Director or Academic Dean's review may engage in the grievance process outlined below.

## **8. TECHNOLOGY USE AT UNIT**

Instructional uses of technology are designed with awareness of accessibility issues. Websites providing information for employees, students, parents, and prospective students meet universal design standards, providing options such as text-only views.

Some common course-related uses of technology may be discriminatory to certain populations. For instance, a chat room is an inaccessible forum for students with learning disabilities, attention deficit disorder, or some mobility impairments, because participation in a chat room requires rapid decoding of text, management of several simultaneous conceptual threads, and quick keyboarding. Chat rooms are typically incompatible with screen readers (for the blind).

## **9. GRIEVANCE PROCEDURE**

The student with a disability has the right to question the granting of a given accommodation. Such grievances are treated with the same care for confidentiality and academic integrity, as are documentation files and accommodations plans. In cases where a faculty member disputes the appropriateness of a course-related accommodation, he/she should address the DSC.

A grievance will be reviewed by the DSC within two weeks of its receipt, and accommodations will continue to be provided as authorized until a decision to the contrary is made.

Ultimate resolution of grievances is in the hands of the ADA Coordinator. The grievance process follows:

- The person with a grievance attempts reconciliation of the matter through the DSC.
- If reconciliation through the DSC is unsatisfactory, the person with a grievance submits his/her grievance in writing to the ADA Coordinator.
- The ADA Coordinator determines the validity of the grievance. If the grievance is deemed valid, the accommodation will end, and the accommodations plan will be re-written by the DSC (and re-submitted to relevant faculty). If the grievance is deemed unmerited, the accommodation will continue.