

# **Disability Services for Students**

## **ADA-504, Title III**

### **POLICIES & PROCEDURES**

*For*

## **OTTAWA UNIVERSITY**

*These policies and procedures/roles and responsibilities are to be provided to all administration, faculty, staff, and students. Please note that OU's office of Human Resources handles disability 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 and provides training to faculty and staff.

**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 as the ADA Coordinator and Disability Services Coordinator is provided on the institution's internet home page under the Disabilities Services link or by going to [www.ottawa.edu/disability-services](http://www.ottawa.edu/disability-services).

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 AND APPROVAL OF REQUEST**

Students with disabilities must initiate their request for accommodations by first declaring their disability in writing **and** then providing the request along with appropriate documentation to the campus's Disabilities Services Coordinator. The [forms](#) to be used for this notification may be found on the University's website.

Notification to other offices 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 responsibility to initiate his/her request for accommodations. The Disabilities Services Coordinator is authorized to develop an appropriate and reasonable accommodations plan, in consultation with the appropriate unit personnel and the ADA Coordinator as necessary.

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

The request for accommodations must be initiated by the student in writing to the Disability Services Coordinator. To ensure adequate time for the University to provide reasonable accommodations students are encouraged to provide requests for accommodation as soon as possible and prior to the beginning of an academic term whenever possible. Requests for accommodations should be provided as follows:

- a. The student shall complete and submit a [Request for Services Form](#). The form may be obtained from the University website or from the Disability Service Coordinator.
- b. The student shall provide the Disability Service Coordinator the [Medical Service Providers Form](#) completed by a credentialed professional that documents his/her disability. The form may be obtained from the University website or from the Disability Service Coordinator.
- c. Students are advised to initiate the process in advance of the academic term in which accommodations are needed to allow adequate time to determine if an accommodation is reasonable and for the development of an accommodations plan. Advance notice assists the University and student to ensure that accommodations are in place for the academic term.
- d. The Disability Service Coordinator shall determine the legitimacy of the documentation and in collaboration with the faculty that are impacted, the Disability Service Coordinator will establish a suggested accommodations plan.
- e. The student shall meet with the Disability Service Coordinator to discuss the suggested accommodations plan and formalize the plan document.
- f. The Disability Service Coordinator shall schedule a time to meet with the student to review the final plan document and review all necessary accommodations. This meeting may be in person or facilitated and conducted via telephone or other video conferencing methods. The student shall sign an acknowledgement of receipt of the plan document per the meeting.
- g. For each academic term following the approval of the plan document and so long as the disability persists, the student shall meet with the Disability Service Coordinator and faculty prior to the commencement of each academic term to review and make any necessary adjustments based on current needs. Substantial changes to the plan shall be supported by documentation from a certified professional and the Medical Service Provider Form.

If accommodations are NOT provided as set forth in the plan document, the student will report directly and immediately to the Disability Service Coordinator, who will conduct an inquiry and resolve the matter to ensure that accommodations are provided. The student is advised NOT to sit for exams or participate in activities for which accommodations have been approved and are 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 (may be via telephone or video conferencing) at any discussions regarding the student and his/her accommodations.

The responsibilities for providing accommodations mainly lie with the Disability Service Coordinator, but the Disability Service Coordinator 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.

### **4. 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:

- a. Confirm the existence of a disability to afford the promise of nondiscrimination;
- b. Demonstrate that the disability creates a substantial limitation to a major life activity to establish eligibility for protection under the law;
- c. Establish a current need for accommodation: The Disability Service Coordinator 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;
- d. Be provided by an appropriately credentialed professional (The Disability Service Coordinator will use their common sense and good judgment in instances of obvious disability).

Documentation will be maintained 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 Disability Service Coordinator will obtain updated documentation to ensure continuing eligibility for services as necessary. An example of a situation that would require updated documentation is a disability that is temporary versus persistent. The need for updated documentation will be determined by the Disability Service Coordinator on a case by case basis after a review of the documentation provided.

## **5. GRIEVANCE PROCEDURE**

The student with a disability has the right to file a grievance of the final plan or from a denial of accommodations. The grievance shall be filed with the Disability Service Coordinator on the [University Grievance Form](#). The form may be found on the University website at or obtained from the Disability Service Coordinator. The form should be provided in person or via email to the Disability Service Coordinator. Upon receipt the Disability Service Coordinator shall forward the grievance to the ADA Coordinator as well as the complete file for the accommodation request and/or plan. The ADA Coordinator is responsible for resolving all grievances. The grievance process is as follows:

- The ADA Coordinator shall determine the validity of the grievance based on a review of the written documentation provided. This shall include the request for accommodations, medical providers form, plan document, and any other documentation that is part of the disability file. If the grievance is deemed valid, the necessary modifications shall be made and the accommodations plan shall be re-written by the Disability Service Coordinator (and re-submitted to relevant faculty). If the grievance is deemed unmerited, the findings of the Disability Service Coordinator will be upheld. The ADA Coordinator shall render a decision within one week of receipt of the grievance.

## **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 Disability Service Coordinator 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.