

GRAYS HARBOR COLLEGE
Administrative Procedure

Subject: REASONABLE ACCOMMODATIONS FOR STUDENTS

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Administrative Procedure Number: 415.01

Date adopted: 10/20/97; 2/18/20 Date Revised: 11/12/13

To receive reasonable accommodations, students are responsible for self-identifying to AccessAbility Services (AAS), requesting accommodations and providing historical and/or current documentation of a disability and the impact of the disability in a timely manner. This policy establishes the scope of and the procedures for requesting those accommodations.

I. Scope

Reasonable accommodations under this policy include, but are not limited to (a) academic adjustments, such as modification of academic requirements; (b) auxiliary aids and services; and (c) accessibility to nonacademic student activities at Grays Harbor College.

Grays Harbor College will make those modifications to its academic requirements that (1) are necessary to ensure those requirements do not discriminate, or have the effect of discriminating, against a qualified student with a disability based on that disability; (2) do not impose an undue financial hardship or burden on the college; (3) do not pose a direct threat to the health or safety of others; and (4) do not make a substantial change in an essential element of the curriculum or a substantial alteration in the manner in which the service is provided.

Appropriate academic adjustments/reasonable accommodations will be provided to qualified students with disabilities for recruitment, the application process, enrollment, registration, financial aid, course work, academic counseling, and nonacademic programs and services.

- A. Section 202 of the Americans with Disabilities Act of 1990, states: "No qualified individual with a disability shall, by reason of such disability, be excluded from the participation in or be denied the benefits of the services, programs or activities of any public entity, or be subjected to discrimination by any such entity."

- B. Section 504 of the Rehabilitation Act of 1973 states: "No otherwise qualified individual with a disability in the United States...shall, solely, by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance..."

II. Definitions

- A. "Reasonable Accommodations" in college programs and services, are (1) modifications of those programs, policies, practices, and procedures; and (2) the provision of auxiliary aids and services that enable qualified students with a disability to have an equal opportunity to benefit from, and have access to college programs and services.
- B. "Student" is a person enrolled at the college.
- C. A "qualified individual" is one who, with or without reasonable accommodation, meets the academic and technical standards required for admission to, participation in, and/or fulfilling the essential requirements of college programs or activities.
- D. A "student with a disability" is a student who (1) has a physical, mental or sensory impairment that substantially limits one or more of his or her major life activities; (2) has historical and/or current documentation of such impairment; (3) is perceived to have such an impairment; or (4) has an abnormal condition that is medically cognizable or diagnosable.
- E. "Undue hardship" is (1) any excessively costly, extensive, substantial or disruptive modification; (2) one that would substantially alter the nature or operation of the institution or any of its programs or services; or (3) one that threatened the health or safety of the college community.
- F. "Program accessibility" means all programs and services, when viewed in their entirety, are accessible to persons with a disability.
- G. "Core Services," such as early registration, textbooks in alternative format or alternative classroom accessibility, as listed in RCW 28B.10.912 that are necessary to ensure students with disabilities are reasonably accommodated at the college.
- H. "Course substitution" is the replacement of a specific course required for a degree program with another course that measures the same learning objectives/skills as the required course. (See section VII of this document).

III. Obligations of the College

- A. Comply with Section 504 of the Rehabilitation Act of 1973, Section 202 of the Americans with Disabilities Act of 1990, ADA Amendments Act of 2008, Washington State laws as described in the Revised Code of Washington (Washington State Law Against Discrimination, Washington State Core Services Bill).

- B. Notify students of the college's policy of nondiscrimination on the basis of disability and of steps the student may take if they believe discrimination has taken place. This notice shall be included in all formal correspondence that communicates decisions or policies adversely affecting the student's status or rights with the institution of higher education. This notice shall include the phone numbers of the United States Department of Education, U.S. Office of Civil Rights, and Washington State Human Rights Commission.
- C. Make available to all students information on the services available to students with disabilities, including the name and location of the AccessAbility Services office and the process for accessing those services.
- D. Work with the student, faculty, and staff on a case-by-case basis, to select and provide those accommodations/core services appropriate for each qualified student with a disability.
- E. Maintain the academic integrity of its programs.
- F. Not make pre-admission inquiry as to whether the applicant has a disability, except as provided by law.
- G. Work collaboratively with eligible students to determine which accommodations are reasonable and appropriate.
- H. Shall require the student provide historical and/or current documentation generated by a medical or professional expert in the related field of disability on the nature and impact of the student's disability.

IV. Obligations and Rights of Students

The college is obligated to provide reasonable accommodation to a qualified student with a documented disability. What is appropriate for a student is a case-by-case determination. A student who seeks accommodations under this policy is responsible for providing documentation of the nature and impact of the disability from a medical or professional expert in the related field of disability. The college will work collaboratively with the student in determining the appropriate and reasonable accommodations.

To insure that needed accommodations are provided in a timely manner, the student shall:

- A. Self-identify and provide AccessAbility Services (AAS) with historical and/or recent documentation of a disability. Provide additional documentation on the nature and

- B. impact of the disability, as the college may require, to determine appropriate and reasonable accommodations. Such documentation may include, but is not limited to, identification of tests administered; test results; description of the covered disability; severity of the disability; functional limitations; and recommended accommodations.
 - C. Complete an Intake Interview with AAS Staff. During the Intake Interview, AAS Staff will discuss the received and reviewed documentation with the student and what reasonable accommodations, if any, the student qualifies for. A Letter of Accommodation (LOA) will be developed and a copy of the LOA will be provided to them and for each of their instructors.
 - D. Forms, such as Student Responsibilities, Student Agreement, Release of Information, and other related accommodation specific forms, will be reviewed and signed during the Intake Interview. The student will also be informed of the process for reasonable accommodations appeals and grievances (see Section VIII).
 - E. Discuss with instructors the identified accommodations for the quarter. Accommodations are not retroactive and are activated when the student has met with AAS Staff, received an LOA, instructor has been notified of the accommodations, and the accommodations have been discussed with their instructors.
 - F. The student will schedule an appointment with AAS to review accommodations and receive an LOA for the upcoming quarter.
 - G. Some accommodations may require some time to arrange. Requests for accommodations should be made in a timely manner prior to the beginning of the quarter for which the request is made. Lack of advance notice may delay the availability of an accommodation. Ideally, requests should be made prior to the start of the quarter.
 - H. Promptly notify AAS Staff of any problems or issues encountered in receiving the identified accommodations.
- V. Obligations of the AccessAbility Services Office**
- A. The AccessAbility Services (AAS) office is responsible for the coordination of services to qualified students with disabilities requiring reasonable accommodations.
 - B. The AAS office is committed to a reasonable approach in the identification of students with disabilities, who voluntarily self-identify during the college registration or orientation process.

- C. Any information regarding a disability will be considered confidential, and will only be disseminated to others in accordance of the terms outlined in the release signed by the student or according to mandatory reporting laws.
- D. Provide self-identifying students with information of AccessAbility Services. Once documentation of the disability is received, review documentation, complete Intake Interview with student, and develop Letter of Accommodation with the student.
- E. AAS Staff will assist and advise each qualified student with a documented disability who requests accommodations under this policy, to, during an interactive process, identify reasonable and appropriate accommodations. The AASoffice will also assist students and instructors with the coordination of accommodations, and ensure that the identified accommodations are provided when activated by the student.
- F. Serve as an advocate for the college and students to ensure equal opportunity and equal access are available through reasonable accommodations in the classroom and all college programs and activities. Inform students of the process for reasonable accommodations appeals and grievances (see Section VIII).

VI. Reasonable Accommodations--Examples by Categories

The process of selecting reasonable accommodations for each qualified student with a disability shall be made on a case-by-case basis, appropriate to the nature and impact of the student's disability.

A. Academic Modifications

Academic modifications may include, but are not limited to:

1. Adaptation of the manner in which specific courses are conducted;
2. Flexibility in the presentation of materials, and test-taking arrangements;
3. Flexibility in credits required to satisfy institutional eligibility for financial aid; as long as the student is in compliance with state and federal financial aid regulation; and

4. Substitution of specific courses required for the completion of degrees; as spelled out in section VII

B. Auxiliary Aids and Services

1. Flexible procedures in the registration process.
2. Qualified sign language, oral and tactile interpreters, or other technological alternatives;
3. Access to adaptive equipment including, but not limited to, FM communicators, amplified telephone receivers, closed circuit televisions, low-vision reading aids, digital recorders, Braille devices and computer enhancements;
4. Textbooks and other educational materials in alternative media, including, but not limited to large print, Braille, digital format, tactile, and audio;
5. Provision of readers, scribes and/or note-takers;
6. Release of syllabi, study guides, and other appropriate instructor-produced materials as soon as reasonably possible in advance of general distribution and access beyond the regular classroom session to slides, films, overheads, and other media, and taping of lectures; and
7. This does not include personal services or devices such as, but not limited to eyeglasses, hearing aids, or personal assistants/care providers.

C. Access

1. Ongoing review and coordination of efforts to ensure campus accessibility, including barrier-free design, signage, identification of hazards of mobility barriers, maintenance of access during construction, and adequate disability parking for all facilities.
2. Facilitating physical access to programs and services including relocating classes, activities, and services to accessible facilities;
3. Referral to appropriate on-campus and off-campus resources, services and agencies; and

4. Accessibility to tutoring, mentoring, peer counseling, and academic advising, if available on campus.

D. Registration Procedures

Some reasonable accommodations take preplanning in order to be effective. Some examples are, but are not limited to, ordering textbooks in alternate format, sign language interpreters, Brailled documents, etc. For students whose accommodations need this type of planning, priority registration is provided.

The purpose of priority registration is to create a process which makes use of current procedures as much as possible and encourages the student to remain responsible for their education.

1. Student meets with AccessAbility Services (AAS) to determine eligibility of services.
2. Eligible student is added to the AAS priority registration list.
3. The priority registration process starts two weeks before the first day of registration.
4. AAS prepares Registration Form with student's name, student identification number, quarter, and year. On the bottom of form, AAS writes "Pre-registration per AAS", signs and dates the form.
5. Students are notified via email when the registration form is ready to be picked up from AAS.
6. Student completes the form with an advisor and provides Admissions and Records with the completed form.

VII. Procedures for Course Substitutions

A. Policy

Grays Harbor College recognizes that certain disabilities may preclude a student from successfully completing a specific course requirement for a degree even with appropriate accommodations. Grays Harbor College recognizes its obligation to

accommodate disabled students without compromising the integrity of the academic program.

Under the ADA, the college is not required to waive essential requirements of a student's program of instruction. Therefore, every student enrolled in a degree program at the college is required to meet the essential requirements of a degree program.

Grays Harbor College recognizes that altered methods of course delivery and/or providing core services will enable most students with a disability to successfully complete course requirements, except in unusual circumstances. Therefore, the student with a disability will attempt to successfully complete the required course with accommodations.

When the need for an accommodation does arise; in all cases, the student must provide conclusive documentation from a qualified physician that the accommodation is warranted.

If the student is unsuccessful in completing the course, the student may request course substitution under this policy. Substitution of courses in degree program requirements will be rarely given, and then only after the student has attempted, with appropriate reasonable accommodations, to meet those requirements.

If the request for course substitution is granted, Grays Harbor College is in no way responsible for the transferability of the credits earned from the substitution.

B. Procedure for Requesting Course Substitution

1. Course substitutions will be approved only when such substitution is consistent with the essential degree requirements.
2. If a substitution is permitted at Grays Harbor College, that permission, in no way obligates a transfer institution to accept the substitution. It is important for the student to know, if a substitution is granted that substitution will be indicated on official transcripts requested by the student.
3. Requests for substitution for a required course shall be considered only when a qualified student with a disability has demonstrated that, even with academic adjustments and auxiliary aids/services provided by the college, they are unable to successfully complete the course solely because of their disability.

4. All requests for course substitutions shall be submitted to AccessAbility Services (AAS) Staff in writing in a timely manner and shall include the following information:
 - a. a description of the accommodation previously provided to the student for the course;
 - b. an explanation of the relationship of the student's disability to the lack of success in completing the course;
 - c. the proposed substitute course, if known;
 - d. a statement by the student that they have made a good faith effort to complete the required course with appropriate and reasonable accommodations; and
 - e. statement from the faculty member involved with the course or program in question;
 - f. a release signed by the student authorizing AAS Staff to review the documentation of the student's disability and to contact the evaluating doctor or psychologist.

5. AccessAbility Services Staff shall forward the request, with documentation to the Vice President for Instruction.

VIII. Reasonable Accommodation--Disputes

Before initiating the appeal process, a student who has a concern regarding a reasonable accommodation(s) will have made a good faith effort and worked with the individual faculty or staff, division chair, dean's offices, and/or committees involved to try and resolve accommodation concerns. During these efforts, students may request the assistance of AccessAbility Services (AAS) Staff to help navigate the process. After exhausting all attempts to resolve issues through different pathways, and if the student believes that their accommodation concerns are still not being met, the student may utilize the following appeal process:

If a student believes AAS Staff has not provided appropriate and reasonable accommodations, or if the student believes an individual, office, or group has failed to appropriately accommodate their needs, then the student has a right to appeal.

1. The student shall submit a written appeal to the Vice President of Student Services outlining the factual basis and rationale of the appeal. Appeals shall be signed, dated, include names, description and date of the incident and the remedy sought.
2. Within fifteen (15) instructional days or as soon thereafter as practicable, the Vice President of Student Services will conduct a thorough interview, review the appeal, and make recommendations in writing for appropriate resolution.
3. If a satisfactory resolution is not reached, the student shall submit a written appeal to Chief Executive Human Resources within in 7 days of receiving the decision. Appeals must specify which portion of the decision should be appealed and the basis for the appeal.
4. The Chief Executive Human Resources has 10 days to respond to the appeal. The Chief Executive Human Resources shall either deny the appeal, or if they believe the appeal has merit, issue an amended decision. Any amended decision is final and no further appeal is available.
5. If no written appeal is submitted to the Chief Executive Human Resources within 7 days, the decision becomes final.

If a student has a grievance and would like to go outside the College for resolution, they may wish to contact:

Seattle Office	Olympia Headquarters Office
Office of Civil Rights U.S. Department of Education 915 Second Avenue, Room 3310 Seattle, WA 98174-1099 Phone: 206-607-1600 TDD: 206-607-1647 Fax: 206-607-1601 E-mail: OCR.Seattle@ed.gov	WA State Human Rights Commission Olympia Headquarters Office 711 S. Capitol Way, Suite 402 Olympia, WA 98504-2490 Phone: 360-753-6770 Toll Free: 1-800-233-3247 TTY: 1-800-300-7525 Fax: 360-586-2282

THIS POLICY DOES NOT PROVIDE RIGHTS OR OBLIGATIONS NOT PROVIDED BY APPLICABLE LAWS.