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1. Preliminaries

1.1. Welcome Letter

“Gallaudet University, federally chartered in 1864, is a bilingual, diverse, multicultural institution of higher education that ensures the intellectual and professional advancement of deaf and hard of hearing individuals through American Sign Language and English. Gallaudet maintains a proud tradition of research and scholarly activity and prepares its graduates for career opportunities in a highly competitive, technological, and rapidly changing world.”

Qualified disabled students served by Gallaudet University's Office of Students with Disabilities (OSWD) are provided with disability support services that allow them to participate fully in university life. Supportive services provide access to curricular and extra-curricular programs and activities so that OSWD students may derive the greatest benefit from their educational experiences. The law governing students with disabilities attending college are quite different (see Section 6) from those encountered in grades K–12; OSWD wants to make the transition as smooth as possible for each student.

Gallaudet University, in Washington, D.C., is well known for its education in deaf studies and American Sign Language. Because of Gallaudet's location in the nation's capital, the Washington metropolitan area has one of the largest deaf populations in the United States. Gallaudet University is committed to providing all its students equal access to learning opportunities.

OSWD envisions a University community that recognizes that students with disabilities are just like any other student—each with his or her own contribution to make. All of us in the OSWD office pledge to work with and for the entire Gallaudet University community to achieve our goals and accomplish our mission.

Get to know us! Please stop by to visit, and bring your questions or concerns. We are located in the Student Academic Center, room 1220. If you prefer, you can email OSWD at <oswd@gallaudet.edu>, or call us at 202-250-2407 (VP), or 202-651-5256 (V). We at OSWD look forward to hearing from you soon.

Sincerely, Patricia Marie Tesar, Ph.D.

1.2. The Gallaudet Credo

Gallaudet's Vision Statement expresses the University's aspiration to be the world's premier academic institution for deaf and hard of hearing people. Implicit in our vision are core values that serve as guiding principles for the way members of the campus community teach, study, work, and live. The Gallaudet Credo identifies and articulates those core values.

The Gallaudet University community includes students, faculty, and staff, all of whom share common goals and values that we believe enrich our academic environment. We prepare students to be informed, literate, productive, and responsible citizens. In pursuit of this goal, community members pledge to uphold the following values:

We believe that education is a dominant influence on our lives and recognize that learning is a lifelong quest. Therefore we will practice academic and personal integrity and work to create a positive and welcoming environment that is open to the free exchange of ideas among members of our community.

We believe that every person should be treated with civility and that our community is strengthened by its broad diversity. Therefore, we will promote and applaud behaviors that support the dignity of individuals and groups and are respectful of others' opinions. We will especially discourage behaviors and attitudes that disrespect the diversity of individuals and groups for any reason including religion, race, ethnicity, gender, age, sexual orientation, disability, hearing status, or language and communication preference.

We believe that as members of the Gallaudet community we are the recipients of a proud and rich heritage, as well as contributors to and benefactors of our institution's bright future. Therefore, we will strive to bring credit to our community and ensure that the institution flourishes and succeeds in its mission.

1.3. OSWD Mission

The Office for Students with Disabilities (OSWD) serves primarily deaf students with disabilities. Disability groups most frequently served by OSWD include students with learning disabilities, attention

deficit hyperactivity disorders, deaf-blind or low vision, psychological disabilities, neuro-muscular disorders, and chronic disabilities.

OSWD provides individually tailored, comprehensive support services and programs for students with disabilities. OSD empowers eligible students to succeed in their pursuit of higher education by striving to assure equal access and opportunity to curricular and extra-curricular activities. Supporting the ideal of life-long learning, OSD encourages and provides experiences and opportunities to build confidence beyond the classroom.

Student autonomy is encouraged through the provision of reasonable accommodations, academic support groups, self-advocacy, and student advisory boards. OSD employs a student-centered interactive model in which collaboration among professionals and OSD students results in a nondiscriminatory academic environment.

In addition, OSD provides professional development services and programs for faculty and staff and for community-based professionals.

OSWD serves several roles for Gallaudet University. Through collaborative efforts with other departments and units, OSD arranges accommodations and special services for students with disabilities. In addition, OSD serves as a source of information regarding legal issues pertaining to disabilities and accommodations. OSD also plans workshop trainings for students and faculty alike.

The University as a whole has an obligation and responsibility to ensure equal access to students with disabilities, be it in the classroom, dormitory, or campus facilities. All faculty and staff employed by the University have a professional and ethical duty to comply with Federal Section 504 of the Rehabilitation Act of 1973 and the American with Disabilities Act (ADA) of 1990 and its later amendments, to provide accommodations and special services to students identified as having disabilities.

OSWD is only one representative among many student-based support services. All accommodations and special services rendered to students with disabilities are the result of collaborative efforts between various departments cooperating to meet the needs of students with disabilities.

1.4. Using This Handbook

This handbook is designed to provide information to help students, faculty, and staff understand how the OSWD process works, and how to make the most effective use of OSWD when addressing with the needs of students with disabilities. The reader will also find guidelines for the delivery of accommodations and special services, as well as guidance for understanding the functions and role of OSWD pertaining to its operation and the delivery of special-need services for students with disabilities.

There are three main sections after these preliminaries:

- General information about OSWD and accommodation for students with disabilities that should be of interest to both students and faculty in Section 2;
- Information of interest primarily to students in Section 3; and
- Information primarily of interest to faculty and staff in Section 4.

The appendices:

- Briefly summarize federal laws pertaining to accommodation for students with disabilities; and
- Provide a guide for high-school educators to help their students with disabilities make the transition to post-secondary education.

This handbook should be used in conjunction with the OSWD section of the Gallaudet University website, where many forms, detailed procedures, and other specific and up-to-date information is available.

1.5. OSWD Offices Hours and Locations

Mailing Address:

Office for Students with Disabilities
Gallaudet University
800 Florida Avenue, NE
Washington, DC 20002

Main Office:

Gallaudet University

I. King Jordan Student Academic Center (IKJ SAC)

Room #1220

800 Florida Avenue, NE

Washington, DC 20002

Hours: Monday—Friday, 8:30 a.m.—5:00 p.m.

- (202) 651-5256 [Voice]
- (202) 651-5887 [FAX]
- (202) 250-2059 [VP]

E-mail: <OSWD@gallaudet.edu>

2. General Information

2.1. Ten Things that Students and Faculty Need to Know about OSD

1. Interaction

Students should introduce themselves to faculty during the first two weeks of the semester.

Faculty can encourage early disability disclosure by including OSD's disability accommodations statement in their syllabus.

2. Guidance

Students should meet their professors regularly, for help with schoolwork and advice.

Faculty are the students' greatest resource and should project an approachable demeanor.

3. Confidentiality

Students are entitled to confidentiality at every turn, in front of peers and faculty both.

Faculty should never reveal a student's disability to anyone, at any time.

4. Eligibility

Students must provide OSD with current documentation in order to receive accommodations.

Faculty should direct any students (those not currently registered with OSD) to the OSD office.

5. **Accommodation**

Students may be eligible for a range of academic accommodations.

Faculty, by law, must accommodate those students who are approved by OSWD.

6. **Exams**

Students, depending upon the nature of their disabilities, are often entitled to extended time.

Faculty should be aware that students are not entitled to unlimited time on exams.

7. **Note taking**

Students, depending upon the nature of their disabilities, are often entitled to peer note taking.

Faculty should aid in the process by soliciting note takers early in the semester and referring them to OSWD.

8. **Rights**

Students with disabilities are guaranteed certain rights under federal law.

Faculty could become more familiar with regulations that affect people with disabilities.

9. **Grievances**

Students should first try to solve conflicts with their professors themselves, before all else.

Faculty should contact OSWD if mediation assistance in resolving issues is needed or desired.

10. **Advocacy**

OSWD staff encourages its **students** to ask questions about disability support.

OSWD staff encourages **faculty** to contact them with questions and concerns.

2.2. Reasonable Accommodation

2.2.1. Overview

A reasonable accommodation is a modification or adjustment to a class or program that allows qualified persons with a disability to participate or to enjoy the rights and privileges offered by the

university. Modifications that impose an undue burden or pose a health or safety risk are not considered reasonable.

The University is required to make modifications only to known and validated disabilities. The student must give the university reasonable notice of the request for modifications. Whatever steps necessary to ensure that qualified individuals with disabilities are not excluded, treated differently or segregated because of the absence of auxiliary aids or services must be taken.

The provision of modifications is coordinated through OSD. Disclosure of eligible disabilities is made to OSD, which also receives medical records and other necessary documentation supporting the student's eligibility and the need for an accommodation.

Students should be able discuss accommodations in collaboration with faculty and OSD staff. Arranging effective accommodations requires that faculty, students, and OSD staff collaborate, communicate, and follow through in a timely fashion.

2.2.2. Extracurricular Activities

The law requires that organizations that receive significant assistance from the University are also governed by the provisions of the ADA and Section 504. Extracurricular activities that are a part of the University are covered by the provisions of the law and should be scheduled at accessible locations if at all possible.

2.2.3. Auxiliary Aids & Services

This term refers to equipment or service providers that augment communication. Examples are sign language interpreters, note takers, readers and scribes, laboratory and library aids, computer-aided transcription devices, assistive listening devices, telecommunications devices, texts in digital formats, and Braille, large-print, and raised-line materials. The University pays the cost of the auxiliary aid or service.

If provision of a particular auxiliary aid or service would result in a fundamental alteration of the program or otherwise create an undue burden, e.g., significant difficulty or expense, the University will attempt to provide an alternative auxiliary aid or service. The University is not obligated to provide personal-care attendants,

individually prescribed devices, readers for personal use or study, or other devices or services of a personal nature.

2.2.4. Fundamental Program Alteration

An accommodation or modification that would result in a fundamental alteration in the nature of the program is not permitted. For example, where a course requirement is essential to the program of instruction taken by the student, the University is not required to waive the requirement.

In evaluating whether requested program modifications would require substantial program alteration or would fundamentally alter academic standards or programs, the program administrator should consider the underlying academic reasons for the program components, the academic standards institutionalized in the program, how the challenged components are consistent with the program standards, and whether the requested accommodations would be inconsistent with the academic goals and standards of the program.

2.2.5. Undue Burden

The University need not make modifications or provide auxiliary aids or services if it constitutes an undue burden. In determining whether an undue burden would be created, the factors to be considered are the nature and cost of the action needed in the context of the overall financial resources of the University.

2.2.6. Direct Threat to Health or Safety

The University is not required to permit an individual to participate in or benefit from a University program or service when that individual poses a direct threat to health or safety. Direct threat means a significant risk to health or safety that cannot be eliminated by modification of policies, practices, or procedures, or by the provision of auxiliary aids or services. In determining whether an individual poses a direct threat to health or safety, the University must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or the best available objective evidence, to ascertain:

- the nature, duration, and severity of the risk;
- the probability that the potential injury will actually occur; and

- whether reasonable modification of policies, practices, or procedures will mitigate the risk.

This standard should be applied to all individuals, and not just to disabled individuals.

2.3. OSWD's Main Service Areas

2.3.1. Services Overview of Services

Services provided by OSWD fall into two general categories: direct services provided by OSWD itself, and indirect services provided in collaboration with and through other units, departments, and agencies on and off campus. Services such as interpreting services, priority registration, audio-logical testing, and psychological and psycho-educational evaluations are classified as indirect services, since they are provided by other units and departments.

Indirect services may also include referrals to service agencies that provide wheelchair repair or rentals, personal attendant care, orientation and mobility assessment and training, specialized transportation, or tutorial services.

Please note that OSWD does not provide services of a personal nature, such as personal care attendants (PCAs), hearing aids, wheelchairs, personal transportation, or anything else that may be considered personal and for use only by the student.

OSWD does not create or change existing policies to accommodate student's disabilities. OSWD does not have the authority to enforce certain existing rules. Rather, OSWD provides an awareness-and-education campaign aimed at affecting policies, but that may not always lead to hoped-for changes in existing policies and standard operating procedures pertaining to disability issues.

2.3.2. Intake Application Process and Eligibility

Students who wish to receive OSWD services must submit both the OSWD Intake Form and the OSWD Information Release Form (both found on the OSWD website), along with current documentation of the student's disability and accommodation needs. This information is reviewed to determine eligibility status for OSWD service acceptance.

2.3.3. Adaptive Technology

Any equipment, furniture, or software that is used to increase, maintain, or improve a student's functional capacity can be provided to ensure access to information and environments that would otherwise be challenging to use.

2.3.4. Auxiliary Aids

Note Takers, readers, scribes, and laboratory and library assistants, are provided for students who demonstrate a need for this service, and request it through OSWD.

2.3.5. Counseling and Staff Support

Students accepted by OSWD are assigned a counselor who assists them with disability support service planning. Counselors are available for consultation and/or advice on many topics related to disabilities and accommodations.

2.3.6. Interpreting Services

OSWD coordinates with Gallaudet Interpreting services to provide tactile and close vision interpreting for students who have a demonstrated need for this service.

2.3.7. Materials in Alternative Formats

Academic materials are available in various formats (including large print, Braille, raised-line drawings, and digital formats) to assure accessibility for students with disabilities.

2.3.8. Testing Accommodations

Students are given the opportunity to study, work with faculty, and/or take tests in a distraction-reduced environment.

2.4. Intake Process and Eligibility Determination

OSWD invites students who wish to request reasonable accommodations to meet with OSWD to discuss their past use of accommodations and any disability-related barriers they anticipate, or

are experiencing, at the University. Although external paperwork may not be necessary to establish eligibility for accommodations, medical records, psycho-educational testing reports, and school records (such as an IEP or 504 Program) may help guide the conversation and support individual requests. If this type of information is available, it should be provided to OSDW along with the completed OSDW Intake and Release Forms. These documents may be faxed to OSDW or brought to the student's first meeting with OSDW.

Students who are coming to the University for the first time need to keep in mind that the laws governing postsecondary education and students with disabilities give the student with disabilities more responsibility for disclosing their disabilities and advocating for their own accommodations. That process can take more time than expected. New students who will be arriving on campus for the fall semester are invited to submit paperwork during the summer before their arrival. Students on campus are advised not to delay meeting with OSDW out of concern for not having appropriate paperwork.

While OSDW asks for “current” documentation of the student's disability, just what is “current” requires individual determination. For example, if a student was born with low vision and his/her vision has not changed through his/her life, the student's records from school would be considered “current” since they still provide a true record. For episodic disabilities (e.g. Multiple Sclerosis, some psychological disabilities, other chronic disabilities), OSDW may seek medical documentation within a recent timeframe (three to six months) or ask for annual updates. It is always appropriate to discuss documentation requirements with OSDW staff.

Our goal is to evaluate the student's needs to determine accommodations that will truly support that student's experience at Gallaudet University. Our question is never “Does the student have a particular disability”, but “Does its impact for this particular student constitute a disability”. Following guidance from the Association on Higher Education and Disability, OSDW recognizes that acceptable sources of documentation for substantiating a student's disability, and supporting a request for particular accommodations, can take a variety of forms, which we prioritize as

1. Student's Self-Report,
2. Observation and interaction with OSDW staff and other trained personnel, and

3. Information from third parties and other external sources.

2.4.1. Confidentiality

Disability related information is to be treated as medical information and handled under the same strict rules of confidentiality, as is any other medical information. This includes any documentation that persons with disabilities provide to establish the existence of their disability and their need for accommodation or consideration.

Disability related information is to be collected and maintained on separate forms and kept in secure files with limited access.

Disability related information is to be shared only on a limited basis within the institutional community. It may be shared only when prior approval is given by the student, or there is a compelling reason for the individual from the institution to be seeking information regarding some specific aspect of this confidential information.

2.4.2. Procedures

The student who wishes to obtain OSWD services must apply for them by submitting both the OSWD Intake Form and the OSWD Information Release Form (both found on the OSWD website), along with current documentation of the student's disability (self-report, medical, psycho-educational, psychological, or other reports), as early as possible. The received information is reviewed to determine eligibility status for OSWD service acceptance. The student is notified within 7 days, in writing, with notice that:

- s/he has been fully accepted into OSWD and is eligible to receive services;
- s/he has been declared eligible for services on a conditional basis, with full acceptance pending the arrival of additional documentation; OR
- s/he has been declared ineligible for OSWD services. A student denied services may appeal the decision through the Grievance Procedure.

If the student has been fully accepted for services, or conditionally accepted for services, s/he is then assigned to an OSWD counselor. The student obtains their class schedule and meets with the counselor. Together they discuss and identify appropriate and reasonable

accommodations and special services relevant to the student's disability needs.

After agreeing on a plan of accommodations and special services, the student and counselor together develop and sign an OSD Support Service Plan (SSP). The SSP is an agreement between the student and OSD outlining the accommodations to be provided in a single semester. Because course requirements change from semester to semester, students' accommodation needs may change as well. Thus, students are required to complete an SSP each semester.

The SSP plan is documented on the Faculty Accommodations Letter (FAL) to be delivered to the faculty members teaching courses in which the student is enrolled.

OSD asks students to sign a one-year release allowing OSD to send each faculty member a Faculty Letter without the student's specific signature. Faculty Accommodations Letters are signed by the OSD counselor. Faculty members receive the signed FAL, prior to the beginning of each semester, both electronically and hand carried, informing them of the need for accommodations.

This process ensures timely delivery of FALs and prevents or minimizes delays in the acquisition of accommodations and special services.

2.4.3. Electronic Signatures not Accepted

Gallaudet University has not yet implemented a verifiable, legally compliant procedure for accepting electronic signatures, so OSD is unable to accept any form of electronic signature at this time. Occasional documents needed by OSD to establish eligibility for services and specific accommodation for students with disabilities have legal standing and require the verifiable, authenticated signature of the student.

2.4.4. Conditional Acceptance

Conditional Acceptance is granted when insufficient information has been provided to document full acceptance. Conditional Acceptance is intended to be temporary and is granted to allow more time for the student to obtain and submit additional documentation. Conditional Acceptance remains in effect until the beginning of the next semester.

OSWD will identify what additional documentation is required for full acceptance. This additional documentation must be submitted before the beginning of the semester following Conditional Acceptance. If this additional documentation is not provided before Conditional Acceptance expires, services may be reduced or suspended.

2.4.5. On-Campus Mental-Health Assessments

Gallaudet's Mental Health Center (MHC) focuses on the mental health needs of Gallaudet students. MHC offers counseling, psychotherapy, assessment, and other mental health services to University students. Services are provided by experienced staff and advanced trainees who are fluent in American Sign Language and with other modes of communication used by deaf and hard of hearing individuals.

OSWD refers students to MHC for psycho-educational, psychological, learning disability, and attention-deficit disorder assessments. The MHC provides a limited number of assessments to students. Gallaudet students who desire assessment services should contact the MHC to be placed on its waiting list. Within a few weeks, the student will be contacted to schedule an initial appointment, where a clinician will explain the assessment process and estimate the wait time, which is typically several months. Students may also obtain referrals from the clinician about off-campus assessment resources.

2.5. Special Housing Requests

OSWD eligible students may request special housing or dormitory accommodations. Such accommodations may include:

- Single room
- Private bathroom
- Wheelchair accessible room
- Ground-floor or lower-level housing for those with mobility and/or visual disabilities
- Wheelchair accessible bathroom
- Room with fan in place of lights to indicate visitors or emergencies such as fire alarm or emergency drill
- Students requesting kitchen access for special meals based on a disability

2.5.1. Procedure for Special Housing Requests

- The student applies for OSWD services (please refer to intake process and eligibility determination)
- The student obtains a special housing request form from Residence Life
- The student submits the completed special housing request form to the OSWD coordinator
- The coordinator reviews the student's file and determines eligibility for the requested services
- The coordinator notifies the student that the request has been approved or denied
- If the student has been approved, s/he retrieves the special housing request form from the coordinator and returns it to Residence Life

Like all accommodations, special-housing requests must be based on the student's documented disability, and be suggested and supported in the medical documentation. This includes detailing how special housing should benefit the student and the expected outcome.

Please note: OSWD cannot be responsible for providing Personal Care Assistants (PCAs) for students. It is the student's responsibility to make all necessary arrangements for hiring and maintaining PCA services, and providing for dormitory housing. Please contact Residence Living regarding policies and procedures for PCAs in the dormitories.

Residence Life will do their best to accommodate students who have requested and are approved for special housing; however, space is limited. There may be a brief waiting period before the request is fulfilled.

Medical, psychological, and/or psycho-educational documentation will be needed to establish the need for residential accommodations. For more information, please contact OSWD.

2.5.2. Meal Waivers and Kitchen Access Requests

Students with disabilities who believe the University meal program is unable to meet their dietary needs can apply for a meal waiver. An application form for meal waivers can be obtained from the office of the Executive Director of Business and Support Services located in

College Hall #316. The procedure for obtaining a meal waiver is attached to the application form.

For students who already have a meal plan, however, due to special dietary needs, the student may need access to a kitchen. In cases like this, requests for kitchen access are to be made to the Director of Residence Life and Housing for consideration.

Kitchens are located in Carlin Hall; students who have been granted use of a kitchen are not required to reside in Carlin Hall.

2.6. Testing Accommodations

OSWD has established testing procedures as mandated by Section 504 and the *Americans with Disabilities Act*.

Faculty will fill out a "Testing Services Request Form" (found on the OSD section of the Gallaudet website) prior to the test. This form should be e-mailed, hand-delivered, or faxed to OSD. Once a test is completed by the student, OSD will either hand deliver the completed test to the faculty member, or wait for the faculty member to pick it up at the OSD office, as previously arranged.

Common testing accommodations include the following:

- Extended testing time
- Notes, formula/vocabulary lists provided during test-taking
- Distraction-reduced testing environments
- Alternative testing formats
- Breaks during testing
- Tests divided into sections to be taken over a period of time
- Use of adaptive technology/computers during test taking
- Reader/scribe services during test-taking

2.6.1. Student Responsibilities

- The student will take the exam during OSD testing hours
- The student will produce a student identification card, and will leave bags and other disallowed items in the OSD office while taking the exam

- The student will comply with the Academic Integrity Policy during the test and, when finished, will hand back the completed exam to OSD personnel

2.6.2. Testing Format

By law, course content and testing format cannot be fundamentally altered to accommodate a student's disability if the change would compromise the validity of test measurement. However, certain proctoring methods may be allowed to accommodate the student's disability.

For example, a student may request, depending on the nature of the disability, that test questions be read or signed by the faculty or reader/scribe. This is perfectly acceptable so long as the student is not being evaluated on reading comprehension. Similarly, the student may request to make oral or signed answers to the test questions, so long as the student's writing skills are not being measured and evaluated.

2.6.3. Testing Request Service Form

The faculty member should verify that the student is a registered OSD client by referring to the Faculty Accommodations Letter sent by the office which outlines appropriate and approved accommodations. The faculty should thoroughly and legibly complete the Testing Services Request Form and return it to OSD along with the exam at least 24 hours prior to the time the exam is to be given. When the exam is received, the faculty member will verify receipt of the exam by signing the form.

2.6.4. Policies and Procedures

These policies and procedures are in force for all students who are registered with OSD and who receive the accommodation of taking exams at OSD:

- Exams with accommodation must be scheduled at OSD prior to the original exam's test date. Any exam not scheduled in advance may need to be rescheduled.
- The student must explain the procedures to the faculty member and inform the faculty that the exam, along with any special instructions and the Testing Request Form, must be e-mailed, faxed or brought to the OSD prior to the time the

student is scheduled to take the exam. This applies to online tests as well.

- It is the student's responsibility to remind the faculty member that s/he is taking the exam at OSWD, and that the faculty member needs to bring the exam to the OSWD office at SAC 1220.
- On the day of the exam, the student must arrive at OSWD prepared and ready to begin the exam at the arranged time.
- If the student does not appear for the exam, then the exam will be returned to the faculty member the following day.
- Tests must be completed entirely during OSWD business hours.
- The student may not adjust the time or date of the accommodated exam without prior approval from the faculty member, who must give confirmation of a change, either orally or in writing, to a member of the OSWD staff.

2.6.5. Notice on Gallaudet's Academic Integrity Policy

“Academic integrity grows from the long-standing traditions of the world university community, and is defined as a firm adherence to the code or standard of values of the University and the individual professions. Academic freedom is a commitment on the part of students, faculty, staff, and administrators, even in the face of adversity, to five fundamental values: honesty, truth, fairness, respect, and responsibility. Commitment to academic honesty encourages the mutual respect and moral integrity that our University community values and nurtures.”

OSWD follows all standards of conduct expected of students enrolled at the University, including prohibiting violations of academic-integrity as specified by the Academic Integrity Committee.

Examples of items that are not allowed during a test:

- Books, notes, formula or vocabulary sheets, or any paper not previously approved by the faculty member or OSWD staff
- Electronic devices such as cell phone, pagers, PDAs, iPods, or flash drives

- Backpacks or bags
- Calculators not previously approved by the faculty member or OSD staff
- Personal laptops
- Any other items not previously approved by OSD staff

Any instance of academic-integrity violation will result in an automatic referral to the faculty. A student who violates Gallaudet University's Academic Integrity Policy will be subject to disciplinary action.

Any unauthorized use of computers at OSD while testing is strictly prohibited, and will result in disciplinary action.

2.7. Braille, Large Print Text, Raised Line Drawings, and eBooks

OSD provides alternative print services for students and faculty by reformatting printed materials such as textbooks, brochures, journals and magazines, class handouts, memos and letters, etc., to the specifications of the request. Conversion formats include Braille, large-print text, raised line drawings, and eBooks.

2.7.1. Braille

This is a system of writing and printing for blind or deaf blind students in which varied arrangements of raised dots representing letters and numerals can be identified by touch. Documents or textbooks are typed and saved as files using Microsoft Word. When needed, the files can be converted to and printed in Braille with the use of Duxbury software. Braille projects are then embossed with a Braille Embosser and bound with plastic bindings.

Textbooks are converted to Braille by chapters. Depending on length and complexity, a typical textbook chapter of 30 pages with illustrations requires approximately three months to convert to a Braille format. Information such as edition, author, title of book, and ISBN are required for OSD to locate the textbook source material. It is critical that the student inform OSD about the textbooks and print materials to be used in the student's classes.

2.7.2. Large Print Text

This is typed material provided in enlarged print according to the type size and font requested. Students may discuss lengthier requests, such as chapters from books, text booklets, or complete books with OSWD's Senior Low-Vision Specialist.

2.7.3. eBooks

Known as Electronic Data Format, such as used on a Kindle or Nook device, these allow material to be read on a computer or hand-held device.

2.7.4. Raised Line Drawings

A raised line drawing, where the content of a graphic illustration is presented in a form that can be felt, is an option for providing access to the illustration for a student who is deaf-blind. Generally, a raised line drawing is produced when a picture, chart, or graph or other illustration cannot be adequately explained through a text description alone. The raised line drawing is a tactile method that augments the accompanying text description and aids in understanding what the illustration is trying to convey to the reader; it supplements the text description. At times, an illustration may be so complex that a text summary or description is insufficient to represent it clearly, so a raised line drawing is used to enhance understanding. The deaf blind student can feel the raised line and track its path at the same time the student is reading the descriptive text.

2.7.5. Requesting Braille, Large-Print, Raised Line Drawings, or eBook Materials

To request textbooks in alternate formats, the student must:

- Submit a request to OSWD.
- Provide a copy of the class schedule with the request.
- For eBook requests, read and sign the Terms & Conditions of E-Book Request Form.
- Purchase a copy of the book and provide a copy of the receipt to OSWD.
- Allow sufficient time to fulfill the request: two to three business days for large-print and Braille, up to three weeks for eBooks.

OSWD will:

- Contact publishers as necessary to obtain eBooks or permission to translate books into Braille and Large Print.
- Contact faculty about the need for the book in the course.
- Transfer eBooks to USB drives provided by the student, or print material in Braille or Large-Print formats.
- Notify the student that materials are ready for use.

2.8. Note Taking Services

OSWD's Note Taking Services Program provides note-taking services for students with disabilities by placing Note Takers in requested classes.

Note Taking Services can take several forms, so long as the outcomes are consistent, reliable, and achieve the same results. The most common Note Taking Service involves a scribe, the person taking notes, placed in a classroom with the OSWD student. However, there are other effective means of accommodation; such tools include, but are not limited to:

- copies of PowerPoint presentations
- lecture notes
- written handouts
- Blackboard

This range of options ensures that the student's needs are met.

Students who request Note Taking assistance should complete a "Note Taking Services Request Form", including the affidavit at the end of the application. The completed form should be handed or e-mailed to the student's OSWD counselor, at least two weeks before the beginning of a semester. Upon approval of the request, the OSWD counselor turns the form and affidavit over to the Note Taking Services Program Coordinator so timely arrangements can be made.

Once the student's request form is received, OSWD will respond within 48 hours with a receipt. Requests will be completed in the order received. The Note Taking Services Program will assign an undergraduate student employed as a Note Taker to requested classes. It is preferable to use as a Note Taker a student who is enrolled in those classes, since this student Note Taker will already have access to the resources needed to take notes effectively.

Like all accommodations, Note Taking requests must be supported by medical, psychological, or psycho-educational documentation, approved and signed by the student's disability support services counselor. The student must inform the counselor of the desire for note Taking Services, and provide copies of his or her class schedule and a completed "Note Taking Services Form" to both the counselor and the Note Taking Services Coordinator.

The student must retrieve class notes by coming to OSWD and collecting them from the assigned personal folder, labeled with the Student's Identification number. Notes typically are placed in the folder within 24 hours after the end of a class meeting. The student must keep the Note Taking Services Coordinator informed of any difficulties. If there is any dissatisfaction with the quality of service, professionalism, or competence of the Note Taker, or missing class notes, the student should contact the Note Taking Services Coordinator.

Note Takers are not expected to attend classes when examinations or individual activities are scheduled, nor are they expected to take notes in the class if the student is absent.

Upon request from a registered graduate student, the Graduate School will provide a student Note Taker for on-campus, face-to-face graduate credit courses. Students who wish to have a Note Taker in a class should inform the professor who will attempt to solicit a Note Taker from among the other students. Once a Note Taker is identified, the requesting student will fill out a request form, available from each departmental office, and bring it to the office of the Graduate Program Specialist in Fowler Hall 202A. Note Takers then distribute a copy of their notes to any students who want them, not just OSWD clients. Note Takers are reimbursed by the Graduate School for their service. In order to receive maximum compensation, students who wish to serve as Note Takers in their classes should complete the free Note Taker training course offered before fall classes begin. For more information, contact Katherine Spiegel, Graduate Program Specialist for Graduate Student Support Services in Room 202A, Fowler Hall, (202) 250-2472 (VP).

2.9. Reading Services

OSWD provides in-person reading or alternative text for students who have low vision or have print disabilities such as dyslexia. OSWD will

secure E-text from the publisher or scan texts not available through the publisher. Assistive technology to access print materials is available for student use at OSD.

2.9.1. Role of the Reader

Readers are available to provide academic support services to students with disabilities so that course material is fully accessible to them. Duties may include in-person reading, taping, test proctoring, and/or assisting students with required library research. Classroom assistance must be approved by the OSD Counselor. Reading for personal study is not provided by OSD.

2.9.2. Requesting Reading Services

To request reading services, students are advised to meet with their OSD counselor who will either contact Recordings for the Blind & Dyslexic (RFB&D) regarding the availability of textbooks or hire in-person readers. A minimum of two weeks notification is required to get materials from RFB&D or to have OSD locate readers for coursework.

2.9.3. Scheduling Readers

OSD employs readers to provide in-person reading for students who are not able to access RFB&D. Students are asked to provide their OSD counselor with their course syllabi. Any additional reading assignments such as pre-reading course material, extended reading for incompletes, and thesis preparation must be approved in advance. Be mindful that readers are themselves students and need sufficient notice to accommodate requests.

2.9.4. Communicating with Readers

OSD students are encouraged to communicate directly with the reader(s) about assignments. OSD can be used as a drop-off and pick-up point for materials.

2.10. Adaptive Technology

Adaptive technology refers to any item, piece of furniture or equipment, or other product used to increase, maintain or improve the functional capacity of individuals with disabilities. OSD provides

adaptive technology to qualified students in order to ensure access to environments and information that would otherwise be difficult for them to use.

The faculty member must be informed well in advance that a student intends to use adaptive technology in the course they teach so that there is ample opportunity to make necessary modifications. Different forms of adaptive technology available through OSWD include, but are not limited to, the various products listed below. Some reasonable modifications to classrooms or other university facilities are available, including the installation of an adaptive technology program on another university-owned computer, or the placement of a CCTV in a classroom. If such an accommodation is needed, it must be requested through the student's OSWD counselor.

Students desiring to use adaptive technology at OSWD may do so by reserving on a first-come, first-served basis with the OSWD Administrative Secretary.

JAWS is a powerful software program designed to work with a speech synthesizer to improve the productivity level of visually impaired individuals, by streamlining keyboard functions, automating commands, and eliminating repetition. Information from the screen is read aloud or transferred via a Braille display, providing technology access to a wide variety of information, education, and job-related applications.

ZoomText is a magnifying software program that enlarges and enhances on-screen text, facilitating access to visually impaired individuals. Text appears clear at all magnifications levels.

Kurzweil readers scan text from a printed document, then presents the text using recognizable speech technology or transmits it via tactile means through the use of a Braille display.

Closed Circuit Television (CCTV) uses a video camera to project magnified images onto a screen. It is primarily used to enlarge text and is ideal for viewing and reading handouts, textbooks, and other assignments by individuals with visual impairments.

JAWS, Kurzweil readers, and CCTV are available for use at OSWD at any time during office hours.

Electronic Data Format (eBooks) allows educational material to be read on a computer or compatible handheld device such as a Kindle or Nook. The process of obtaining an eBook can be time-consuming, and some publishing companies may take up to three weeks to process such requests. Please note: some faculty members may scan their own textbook in the Blackboard; please check to see if you have this option before making a request from OSWD.

Students interested in requesting a course book in eBook format must comply with and follow the procedures given below:

- Once approved for accommodations at OSWD, a student may discuss with their OSWD counselor receiving eBooks for their course work. The counselor must base the need for eBooks on necessary accommodations as found in the student's medical or diagnostic records; not all OSWD students are eligible to receive eBooks.
- The counselor approves the accommodation of eBooks for the student.
- The student fills out a request form for the eBook and gives it to the Senior Low Vision Specialist for processing. A receipt for the request will be sent to the student within 48 hours. The student must provide a USB memory device for eBook documents.
- OSWD contacts the publishing company to obtain an alternative media format of the book. This typically takes up to three weeks. OSWD will work with the student to ensure necessary assistance during the procurement of the eBook.
- Some publishing companies may require purchase of the book in order to receive a digital version of that book.
- Once the eBook is received, the file is transferred to the student's USB device, or e-mailed to the student. The student must pick up the USB device within two days of confirmed delivery.

2.11. OSWD Interpreting Services Procedure

OSWD works collaboratively with Gallaudet Interpreting Services (GIS) to ensure that OSWD students receive equal access to classroom information through the use of American Sign Language (ASL) interpreting services. OSWD registered students are eligible to receive

interpreting services when there is a documented need for this service as an accommodation.

OSWD prioritizes interpreting services in the following order:

1. academic classes,
2. academic class-related or class-sponsored activities,
3. study abroad,
4. extracurricular activities, then
5. consortium courses.

2.11.1. Academic Classes

Students must complete the OSD *Interpreting Services Request Form* and provide OSD with a schedule of classes two weeks prior to the start of a semester to allow for a reasonable amount of time to reserve service and have an interpreter present on the first day of class. If a request is submitted after this deadline, there is no guarantee that interpretation will be available on the first day of class.

2.11.2. Class-Related or Class-Sponsored Activities

When requesting services for academic-related activities, such as student-faculty meetings or watching required videos outside of class; or course-sponsored activities, such as field trips or off-campus presentations, students are to email their OSD counselor and send a copy of their email to GIS and the course faculty.

Requests should be made at least 48 hours prior to the event. In case of emergency, the time, date, location, and purpose of the event must be shared when the request is made.

2.11.3. Study Abroad

Students requesting interpreting services for study abroad programs must complete the OSD *Interpreting Services Request Form* and provide OSD with a study abroad schedule three months prior to the start of the trip to allow for a reasonable amount of time to reserve service. If a request is submitted after this deadline, there is no guarantee that interpretation will be available for the trip.

OSWD will work collaboratively with GIS and the Office of International Relations to ensure that OSWD students receive equal access to information through the use of American Sign Language (ASL) interpreting services.

2.11.4. Extracurricular Activities

Students needing interpreting services for extra-curricular activities such as sorority, fraternity, or Student Body Government meetings or campus-wide events are referred to the event host to make their interpreting request. It is recommended that the student petition the hosting department to provide interpreting services.

2.11.5. Consortium Courses

If interpreting services are needed for an online course or consortium course at another institution, it is the host institution's responsibility to provide those services. The student must contact the relevant office (often called "Disability Support Services") at the host institution.

2.11.6. Scheduling Changes and Canceling of Services

If a student makes changes to their academic schedules, they should contact their OSWD counselor immediately so the arranged service providers can make any necessary adjustments as soon as possible.

If a student knows s/he will be absent from a class or an event during which services are scheduled, s/he **must** e-mail Gallaudet Interpreting Services directly at least 5 working days, with copies sent to OSWD and the faculty member, to cancel services.

A student must notify GIS and OSWD when withdrawing from a course for which interpreting services were arranged.

2.11.7. Attendance Policy

If a student knows s/he will be late or absent from a class with interpreting services scheduled, s/he **must** contact GIS and OSWD directly via e-mail. This is in addition to satisfying the policy and procedure on absences stated in the course syllabus and mandated by the professor of the course.

CDI interpreters working with OSD students are required to report student absences via email to both GIS and OSD. OSD will issue a warning notification to an OSD student after the second absence. The warning will alert the student that one more absence will result in suspension of interpreting services.

When a student is late, GIS interpreters will wait for 20 minutes for each hour of class time. This means 20 minutes for a 50 minute class, or 30 minutes for a 90 minute class. If the student does not show up within the allotted time, the interpreter is free to leave.

2.11.8. Suspension of Interpreting Services

Interpreting services are suspended when:

- The student has three unexcused absences; or
- The student repeatedly does not utilize interpreting services when provided.

Students must petition the director of OSD for reinstatement of services. Such requests will be considered on a case-by-case basis.

2.11.9. Dissatisfaction with Interpreting Services

Students should inform both GIS and OSD if an interpreter is late; the professor of the class for which interpreting services were scheduled should also confirm this.

Students are encouraged to approach the interpreter initially to discuss expectations and request modifications to service, and to provide feedback periodically. If the student is still dissatisfied with the interpreting service, GIS and OSD should be contacted so the situation may be resolved.

Questions regarding making arrangements for interpreting services should be directed to OSD staff, who will assist. Students are expected to be proactive towards their education. Self-evaluation of one's comprehension of lecture materials as they are delivered, as well as class performance, should take place on a frequent basis. Faculty members should be contacted immediately if there is any concern.

2.12. Counseling and Support Staff

OSWD staff members are committed to providing students equal access to educational achievement at Gallaudet University. Faculty members will be assisted with determinations regarding reasonable and effective accommodations, class adjustments, and teaching strategies for working with OSDW students.

2.12.1. Counseling at OSDW

Students are assigned to a counselor who is trained and experienced in providing accommodations in coordination with faculty and in consideration of specific disabilities. The counselor works with the student on the issues not only of academic accommodations and self advocacy, but also of curricular and extra-curricular activities, as well as the transition from school to work.

2.12.2. Counselor Transfer

Changing OSDW counselors may be permitted on request to the OSDW director. The director reviews the request and determines whether action is merited. If a student's assigned counselor is no longer available, the student will be assigned to another counselor.

2.12.3. Support Staff

The support staff of OSDW assists students in making counselor appointments, accessing testing accommodations, printed materials converted to Large Print or Braille formats, and using assistive technology, such as Zoomtext, Closed Captioned Televisions, and eBooks.

2.13. Other Accommodation Policy Information

2.13.1. Extended Time

Extended time to complete an assignment is reasonable so long as the student and faculty develop and chart the student's progress according to agreed-upon terms. Should the student fail to account for missing deadlines as planned for the project or assignment, the faculty member can reasonably be expected not to grant extensions when the student's disability was not evidently the cause of the missed deadline. Reasonable expectations apply to course incompletes as an accommodation.

2.13.2. Distance Education and Online Courses

Distance Education is a planned teaching and learning experience that uses a wide spectrum of technologies to reach learners at a distance (i.e., not on the Gallaudet campus) and is designed to encourage learner interaction and certification of learning. Distance education encompasses both live courses at locations off campus, and online courses and webinars.

Distance Education is new to Gallaudet; its introduction is overseen by the Office of Distance Education (ODE). ODE is working to make sure that all services available to students who reside on the Gallaudet campus are also available to online students and faculty. OSWD is working with ODE to make sure that the distant learner with disabilities has access to all appropriate accommodations, and receives, to the extent possible, the same educational, community, and support experience as on-campus students.

Students with disabilities who wish to register with OSWD are encouraged to contact the Office as soon as possible, so accommodation requests can be evaluated. Distant learners follow the same intake procedures, submitting the same forms, as resident students. All forms used by OSWD are available in online formats in the OSWD section of the Gallaudet website. For more information, please contact <OSWD@gallaudet.edu>.

2.13.3. OSWD Study Abroad Procedures

Research Study Abroad Programs: Study abroad is an integral part of the Gallaudet University experience as it promotes the academic, personal, professional, and intercultural development of students. Gallaudet University Office for International Relations strives to create an inclusive environment that responds effectively to students needs. The Office of International Relations encourages students and staff to discuss program options and concerns so that effective guidance can be provided.

Disclosing Your Need for Accommodations: Students who need accommodations based on the potential impact of a disability should discuss this with OSWD and the study abroad program early in the semester to arrange course specific accommodations.

Request Accommodations for Study Abroad: Students should meet with their OSWD counselor to discuss requested study abroad accommodations. At the student's request, OSWD will prepare an individualized accommodations letter to the study abroad program outlining the student's eligibility for accommodations.

Interpreting Services: Students requesting interpreting services as part of their study abroad program are to follow the "OSWD Interpreting Services Procedures".

Please note: study abroad programs are not obligated to meet a request for accommodations without prior notification of the need. Foreign countries have their own rules and regulations concerning academic accommodations and do not necessarily comply with ADA regulations.

2.13.4. Priority Registration

All OSWD students are entitled to priority registration as an accommodation. Students receiving priority registration accommodation will be contacted by the Registrar's Office and provided with a date and time at which to register for their courses. The student must keep his or her assigned registration appointment; otherwise the student will forfeit priority registration for that semester and must register during the regular registration period.

OSWD students are strongly encouraged to take advantage of priority registration so they can:

- Get the most appropriate classes and class schedule for meeting accommodation requests.
- Contact faculty members before classes start to discuss accommodation needs and request a course syllabus to can get a head start on readings, assignments, etc.
- Order taped textbooks and other materials in adapted media in advance to have all the necessary materials prior to the first day of classes.
- Plan a schedule that allows classes to be arranged to ensure appropriate travel times, particularly if extended test-taking time is used.
- Get a head start on learning specific class locations and get route training if necessary.

2.13.5. Reduced Course Load

Reduced course load implies that the student may register for less than the normal required credit hours that constitutes full-time student status. If a student has a reduced load as an accommodation, the student may take less than 12 credit hours per semester and still be considered full-time.

Reduced course load does not refer to reduced course requirements. Faculty cannot alter the course contents and objectives to accommodate students with disabilities. If the course syllabus calls for the students to complete four projects or assignments, then every student is expected to complete all four projects or assignments.

2.13.6. Procedures for Requesting Academic Adjustments: Course Substitutions & Program Modifications

Regulations for Section 504 of the Rehabilitation Act of 1973 specifically address the issue of accommodation in the event that fulfilling a course requirement puts a student with a disability at a disadvantage. Gallaudet University complies with these regulations by offering qualified students with disabilities the opportunity to request an academic adjustment based on their disability.

“Qualified students with a disability” in this case means students who, with reasonable accommodation, can meet the essential requirements of an academic program. For example, if a physically challenged student is required to complete a physical education activity course but is not physically able to do so, these procedures may apply. It is appropriate that the disabled student, the academic departments involved, and OSWD work together to determine an appropriate substitution.

The most common course substitutions for learning disabled students are related to math and to foreign languages, but specific substitutions are made based on individual circumstances. Factors complicating substitution decisions include the wide range in types and severity of any particular disability; variation in diagnosis and interpretation of the disability; and whether the disability's effects can be remediated through reasonable accommodations or study strategies such as extended time on exams, extra take-home assignments, specialized tutoring, and compensatory strategies.

Federal regulations that apply to Gallaudet require that it “shall make modifications to its academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating on the basis of disability, against a qualified disabled applicant or student. Academic requirements that the [University] can demonstrate are essential to the program of instruction being pursued by such student ... will not be regarded as discriminatory

Modifications may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted.”

In general, students with disabilities are expected to meet the course and academic-program requirements of Gallaudet University, as are all students. When a course is essential to a major-level program, as decided by Gallaudet University's Academic Adjustments Committee, no modifications are possible. It is absolutely necessary, for example, for an engineer or architect to have courses in mathematics, or for a lawyer to have courses in government. “Academic programs” include

- the Undergraduate curriculum;
- a special field of concentration (major) at both undergraduate and graduate levels; and
- non-credit or developmental courses.

When a student with a disability is not able to succeed in a course that is not essential to a major-level program, and if the lack of success is due to a disability, requesting an academic adjustment may be appropriate. A course substitution, for example, may be granted for a particular course when it is not essential to the student's major. For example, a quantitative methods course may not be essential for students majoring in English. In such cases, students with disabilities may be able to demonstrate competence in a related subject in which their disability does not hinder them. A program modification may include substituting one course for another or modifying a required course.

Students with disabilities must request modifications in a program early enough in their university career to allow the request to be processed and for arrangements to be made for the student to complete the recommended substitution or modification in a timely manner. If the student changes majors after a course adjustment or

substitution has been granted, previously adopted course changes may not be approved for the new major.

Student Procedures for Submitting Requests for Academic Adjustments

An academic adjustment is considered a disability-related accommodation, provided the disability is supported by appropriate medical, psychological, or psycho-educational documentation. The request for an academic adjustment must be made in writing to OSWD and include:

- The course in question;
- The nature of the relevant disability and the reason for the accommodation;
- The student's history with the subject matter, including previous attempts to pass the course;
- The student's history of accommodation pertaining to the course; and
- Disability documentation supporting the request.

Requests will be considered by an Academic Adjustments Committee, whose members include:

- OSWD representatives;
- Deans, Academic Affairs (either Undergraduate or Graduate Dean);
- Academic Advising representatives; and
- Chairperson of the Department

The Committee may also include the student's academic advisor, representatives from the Mental Health Center, or the faculty member who is teaching the course in question.

The Academic Adjustments Committee will meet within three weeks of the date a student submits a written request, and will notify the appropriate academic officials of its judgment within one week of its meeting. The outcome will be one of the following:

- **Approval** of a specific academic adjustment in the student's course or program of study, with notification to the Registrar's Office of the substitutions or modifications granted;

- **Pending** additional documentation to enable complete consideration of the student's request by the Committee;
 - The student has provided insufficient documentation of the disability to enable the committee to make a decision.
 - The students will be given one semester in which to provide sufficient documentation.
 - If documentation is not received within one semester, the student must reapply to the committee once documentation has been obtained.
- **Denial** of the student's request for an academic adjustment for one of the following reasons:
 - The course under consideration is deemed essential to the program of study; or
 - Documentation does not support the academic adjustment requested.

Decisions by the Academic Adjustments Committee are considered final. Their execution shall be supervised by the Academic Dean of the school in which the student requesting an academic adjustment is enrolled. If the student requesting an academic adjustment does not agree with the Academic Adjustment Committee's decision, he or she may initiate the Gallaudet University Section 504/ADA Student Grievance Procedure (see the section of the same name in this handbook).

2.13.7. Attendance Policy

Faculty cannot alter attendance policies to accommodate a student's disability if the attendance policy counts for a percentage of the course grade for the semester, or if failure to maintain attendance would lead to a lower grade. An unexcused absence is treated the same for all students. If a student with a disability is required to miss class because of his or her disability, the student must document such absences as a medical excuse based upon the disability, and this information should be provided to the faculty upon request.

2.13.8. Section 504/ADA Student Grievance Procedure

I. Policy Statement

The Americans with Disabilities Act (ADA) prohibits the exclusion of people from jobs, services, activities, or benefits based on disabilities. In addition, Section 504 states that no otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Education. Further, it specifically ensures that no qualified individual with a disability shall, on the basis of disability, be subjected to discrimination under any program or activity that receives federal financial assistance.

Consistent with its nondiscrimination policy, Gallaudet has made many accommodations and implemented technological advancements to facilitate a fully accessible, barrier-free environment. Gallaudet will, upon disclosure, attempt to make other reasonable accommodations if appropriate. (Please refer to Gallaudet University Administration and Operation Manual (A & O) policy, “1.10 Reasonable Accommodations.”)

Students who believe they have been discriminated against, in violation of the Acts, should follow the procedures described below.

II. Scope of Grievance

Any University student who believes that he or she has been subjected to discrimination on the basis of disability or has been denied access or accommodations required by law shall have the right to invoke this Grievance Procedure. In general, this Grievance Procedure is designed to address the following types of concerns:

- Disagreements or denials regarding requested services, accommodations, or modifications to University practices or requirements;
- Alleged inaccessibility of a University program or activity;
- Alleged harassment or discrimination on the basis of a disability; and
- Any other alleged violations of the ADA and/or Section 504.

This Grievance Procedure, however, is not intended and shall not supersede other University policies and procedures which may exist for addressing issues of concern unrelated to disabilities for which separate University policies and procedures exist, including, for

example, grade appeals. For these types of alleged violations, students should use the Student Grievance Policy procedures.

III. Procedures

All disability-related grievances covered by these procedures must be filed within 45 days of the alleged compliance violation. The University may extend this time frame when a delay is due to circumstances beyond the students control, e.g., illness or incapacity. As an initial matter, all grievances shall be reviewed to determine whether they are submitted within a timely manner and/or whether they contain all required information. The University shall not review a grievance that is untimely or fails to contain all required information, including a clear statement of all grounds for the grievance. To facilitate a clear and prompt resolution, once initiated, a grievance shall not be expanded beyond the issues presented in the student's initial complaint. The University reserves the right to redirect a grievance to the proper grievance procedure or to any other appropriate review procedure.

The written complaint shall include the following:

- A full description of the problem and any relevant facts;
- A summary of the steps the student has already taken in attempt to resolve the problem, including the names of persons involved;
- A statement of the requested resolution and the student's rationale for the requested accommodations for each perceived violation;
- Any supporting documentation; and
- The name, contact information and signature of the person initiating the complaint.

Informal Grievance Procedures

A University student is encouraged to first attempt to resolve his or her complaint informally by selecting any of the following steps:

- Present their concern in writing to the instructor or to the department head and/or Dean within 45 days of the incident causing the complaint. The complaint should explain the nature of the problem and a suggested solution. Unless there are extenuating circumstances, the instructor or department head will resolve the complaint or respond within 10 days.

- The student may bring their concern to the Director of the Office for Students with Disabilities or his or her designee. The regular OSWD documentation/accommodation process will be followed.
- Students may consult and seek the assistance of the University's Ombuds as a way of informally mediating any unresolved issues.

Formal Grievance Procedures

If no satisfactory resolution is reached after the above informal attempts to resolve the complaint are made, or if the student chooses to bypass the above informal complaint process, students should submit a written complaint. If a student attempts to resolve the matter informally and that attempt has failed or the student decides to end the informal process for any other reason, the student will have an additional 10 days to file a formal complaint. A listing of all meetings and/or written attempts to resolve the issue should be included with the formal complaint.

1. Where the complaint alleges the denial of an approved academic accommodation or service by a faculty member, the complaint should be filed with the Office for Students with Disabilities (OSWD). OSWD shall assess the formal complaint and review all information necessary to render a written determination to the student and the Administrative Officer or appointed designee. If requested, the student shall submit any additional information and/or documentation as requested by OSWD. OSWD will issue a letter of determination to the student and faculty member of their findings within 10 days of the student's formal complaint.
2. If the student disagrees with the determination given by OSWD, the student may seek a review of the grievance by the Office of Equal Opportunity Programs. The University's EEO Officer will review the letter of determination offered by OSWD and review all information necessary to render a written determination. If needed, the student shall submit any additional information and/or documents as requested by University's EEO Officer. The EEO Officer will issue a letter of determination within 10 days of receiving the student's request. The EEO Officer will supply the student and relevant parties with a copy of the letter of determination and take any steps necessary to implement his or her decision, including but

not limited to, providing a copy of the letter of determination to the appropriate University officials.

3. If the complaint is against the Office for Students with Disabilities, e.g., regarding the denial of requested accommodations, the complaint should be filed with the University's EEO Officer. Similarly, all other complaints of disability discrimination covered by this procedure (e.g., alleging inaccessibility of a University program or activity, harassment, or other discrimination based on disability) should be filed with the EEO Officer. The EEO Officer will conduct an investigation of the complaint. This will include providing the student with an opportunity to submit evidence, including identifying witnesses and documents for the EEO Officer's consideration as part of the investigation. The EEO Officer will provide a written letter of determination to the student, the individual accused of discrimination, and the Administrative officer or appointed designee. Unless there are extenuating circumstances, the University's EEO Officer will issue the letter of determination within 10 days of receiving the formal complaint. If extenuating circumstances cause a delay, the EEO Officer will notify the student in writing of the delay along with an anticipated timeframe for issuance of the final letter of determination. The EEO Officer will supply the student and relevant parties with a copy of the letter of determination and take any steps necessary to implement his or her decision, including but not limited to, providing a copy of the letter of determination to the appropriate University officials.
4. If the student disagrees with any determination made by the EEO Officer, the student may seek a review with the Provost or his/her designee. The student shall submit a written letter requesting a review of the complaint. The Provost or Designee shall review the student's letter, all pertinent records, and documentation. The Provost or his/her designee will provide a letter of determination to the student within 10 days of the student's request unless there are extenuating circumstances. If extenuating circumstances cause a delay, the Provost will notify the student in writing of the delay along with an anticipated timeframe for review and issuance of the final letter of determination.

5. A student may withdraw a formal grievance at any time by written notice to the administrator or office handling the grievance at that time.
6. Grievance records will be held in the office where the formal grievance is first filed. Records will be held for a period of three years after which the records will be destroyed.

Timelines

Specified time limitations refer to the academic year, September through May. If a student presents a grievance in June or the alleged incident allegedly occurred during the summer months, the time calculation may be suspended between the end of the academic year and the opening of the following academic year in September. In such a situation, the 45-day timeframe would begin the first day of the academic year. In addition, time limitations do not include official University holidays or other closures during the regular academic year. The term "days" refers to days when the University is open for business.

OCR Complaint

Although students are encouraged to attempt to resolve complaints pertaining to disabilities by using this grievance procedure, they have the right to file a complaint directly with the U.S. Department of Education, Office for Civil Rights (OCR):

U.S. Department of Education
Office for Civil Rights D.C.
Enforcement Office 400
Maryland Avenue, SW
Washington, D.C. 20202-1475
Telephone: 1-202-245-8300 FAX: 202-245-8301 TDD: 877-521-2172
Email: <ocrdc@ed.gov>

Retaliation

The University prohibits retaliation against any student for filing a grievance under this process or against any other individual participating in the investigation of a grievance. Any such retaliation is against state and federal laws and Gallaudet University Policy. Retaliation may be subject to disciplinary action up to and including termination. Students or any individual who has participated in the grievance process in support of the student may file a grievance under

these procedures with the University's EEO Office if they feel they have been retaliated against.

Confidentiality

The student's confidentiality shall be maintained by each person involved in the informal or formal investigation or resolution of a student grievance under this policy. Any disclosures regarding the student or the investigation shall be limited to the minimum necessary to accomplish the investigation or address the student's grievance.

2.13.9. Confidentiality & Release of Information

Confidentiality, especially when disclosing a disability and the need for accommodations, is critical in all matters pertaining to students with disabilities. Disability-related information is handled under the same strict rules of confidentiality as is other medical information, specifically including the documentation that persons with disabilities disclose to OSD when arranging accommodations. OSD has procedures in place to secure the confidentiality of documents in its offices.

All discussion between the student and faculty member are protected. For instance, a Note Taker may be identified in the classroom, but no disclosure should be made about whom the Note Taker is assisting. The Note Taker maintains confidentiality by delivering copies of the notes for the student to pick up at the OSD office.

OSD is the single office at Gallaudet charged with the responsibility for collecting and handling disability-related documentation, and OSD does not disclose confidential matters concerning a student's disability without the express permission of the student. Faculty inquiring about a student's disability must discuss the matter directly with the student if the faculty feels that the knowledge gained will enhance accommodations for the benefit of the student. Legal opinion holds that faculty members generally do not have a need to know what a student's disability is, only that it has been appropriately verified by OSD.

The need for disclosure, or its necessary extent, may change with circumstances. For instance, if a student with a disability moves into university housing, Resident Life may need to know about the

condition in order to provide proper emergency access. Similarly, if a student files a grievance regarding treatment by a faculty member, the administrator charged with handling the matter may need to know the specifics of the individual's disability and history at Gallaudet.

Students are requested to sign a form authorizing release of personal information to OSD. With this permission, OSD can contact the student's medical practitioners to verify disabilities before providing accommodations. Without this release, students may not receive accommodations.

[Some information in this section is based on the pamphlet "Confidentiality & Disability: Issues in Higher Education", Association on Higher Education and Disability, Huntersville, NC, 2011.]

2.13.10. Faculty Accommodation Letters

Upon acceptance for OSD services, a one-year release will be obtained from the student so a Faculty Accommodations Letter can be distributed to faculty in classes where the student is requesting accommodations. (Please note that OSD will no longer send Faculty Contact Forms; rather, OSD will send a Faculty Accommodations Letter outlining the accommodations needed.) In the past, delays occurred in sending information to faculty because OSD had to wait for students to sign each form. Consequently, in order to avoid unnecessary delays, OSD will ask students to sign a one-year release allowing OSD to send each faculty member a Faculty Accommodations Letter without the student's specific signature.

2.13.11. Temporary Disabilities and Good Faith Efforts

OSD recognizes that individuals with temporarily disabling conditions that are a result of injuries, surgery, or short-term medical conditions may need access to services and resources similar to individuals with permanent disabilities. Examples of temporary disabilities include: broken limbs, hand injuries, or short term impairments following surgery or medical treatments.

A student with a temporary disability may contact OSD for assistance even though the student may not meet the regular eligibility requirements for OSD services. For example, an athlete

may suffer a sprained wrist or broken arm; however, the injury is not a permanent disability and the athlete may not qualify for OSDW services. Nevertheless, the student could benefit from special accommodations, such as Note Taking services. OSDW would therefore work with the faculty to provide services as a good faith efforts.

The same good faith effort applies to a student who applied for OSDW services and is currently awaiting medical, psychological, or psycho-educational documentation in support of the existence of a disability or recommendations for accommodations.

2.13.12. Participating in Extra-Curricular Activities

OSDW is committed to making recommendations and providing accommodations for any requests made by students with disabilities as they strive to participate in extra-curricular activities. That said, when accommodations at extra-curricular activities require budgetary expenses, the University must put the responsibility for such requests directly with the individual unit, department, organization, or those providing oversight to the organization. Students hold the responsibility to submit requests in a timely fashion (within two weeks before the event) in order to receive necessary accommodations. This may be done by e-mailing OSDW with details of the event, including title, location, date and time.

Generally speaking, when accommodations, such as interpreters, are made from the organization or those providing oversight to the organization, OSDW will direct such requests to Gallaudet Interpreting Services. If building changes are needed, such a request can come for the organization directly to the Registrar's Office. If there is, for instance, a weekly meeting at one of the dormitories, students may make requests through Resident Life.

2.14. Universal Design

“Universal Design” is the design of products and environments to be usable by all students, to the greatest extent possible, without the need for adaptation or specialized design. Educational environments are created to be welcoming and inclusive of individual differences, creating physically accessible spaces, accessible policies and procedures, and accessible curricula. Faculty are encouraged to

develop a class for all students, rather than some “average” student, considering the inclusion of non-traditional students, students who process information differently, those who use wheelchairs, and those who use assistive technology. The conceptual framework for universal design originates in the belief that a broad range of human ability is ordinary. The goal is to create an academic experience that reduces the need for individual accommodation and welcomes all students.

Universal design considers universal access during the design process rather than as an alteration afterward. The thoughtfully conceived design will naturally include the greatest number of people most naturally. Consider curb cuts originally designed for wheelchairs but making life easier for bicyclists, people with baby strollers, or those pulling wheeled luggage. Captioned films shown as part of a presentation can benefit everyone viewing the film.

Just like in the physical world, universal design in the classroom can have a powerful effect on the students feeling included. When faculty design courses using universal design, they consider a wide variety of learners and work to minimize potential barriers. In designing courses, materials, and activities, these universal-design principles are considered:

- Equality
- Flexibility
- Predictability
- Clarity of expression and vocabulary
- Opportunities for clarification
- Ease of participation
- Inclusiveness of the environment: space and acoustics, for example
- Opportunities for interaction
- Inviting attitudes

[Parts of this section were adapted from the pamphlets “Universal Design and Higher Education: A Guide for Students”, undated; and “Universal Design for Inclusive Lectures and Presentations”, 2010, both by the Association on Higher Education and Disability, Huntersville, NC.]

2.15. Emergency Preparedness

2.15.1. General Guidelines

- If you are a person (employee or student) with a disability who may need assistance during an emergency, establish a plan ahead of time that assures you get the help you need. Work with OSWD to develop an individual plan for various types of emergency situations.
- In any emergency, if an individual wants to help a person with a disability, always **ask how** you can help **before** giving assistance. **Ask how** the person can best be assisted or moved, and whether there are any special considerations or items that need to come with the person.
- **Do not** use elevators, unless authorized to do so by an officer of the Department of Public Safety, or police or fire personnel. Never use elevators if there is fire or structural damage to the building.
- In a life-threatening situation, contact the Department of Public Safety at x5555 (Voice/Videophone), x5444 (TTY), page <DPS.Office@Gallaudet.edu>, or call 911.
- In a life-threatening situation, follow a pre-established plan where possible, but do not hesitate to help a person with a disability to evacuate the building using whatever means possible.

2.15.2. Assisting People with Disabilities in Emergency Evacuation

- **Using Campus Emergency Evacuation Chairs:** The OSWD section of the Gallaudet website has a 14-minute, closed captioned video, produced by Garaventa, that explains the use of their "Evacu-Trac" emergency evacuation chairs.
- **People who are Mobility Challenged and use a wheelchair:** When the alarm is activated, people using wheelchairs should either "Stay in Place" or "move to a safe place" and wait for assistance from the Floor Captain, a member of the DC Fire Department, or other trained emergency personnel.
Emergency personnel are trained to go to Areas of Refuge to assist people with disabilities. If the person with a disability is alone, s/he should contact the Department of Public Safety, x5444 (TTY) or x5555 (Voice/Videophone), page: <DPS.Office@Gallaudet.edu> or call 911. The person should

give a current location or Area of Refuge to which s/he is going. Elevators are to be used **only** if authorized by emergency personnel, but may never be used in the event of fire or structural damage.

- **People who have Mobility Challenges and do not use a wheelchair:** People with mobility challenges who are able to walk independently may be able to negotiate stairs in an emergency with minor assistance. In an actual evacuation, these individuals may choose to wait until heavy traffic has cleared before attempting the stairs. If there is no imminent danger, the person with a disability may choose to stay in the building or move to an Area of Refuge until emergency personnel arrive. Elevators are to be used **only** if authorized by emergency personnel, but may never be used in the event of fire or structural damage.
- **People who are Deaf or Hard of Hearing:** Most areas and rooms in University buildings are equipped with fire bells and strobe lights that simultaneously sound an alarm (auditory) and flash strobe lights (visual). Although this system is intended to alert deaf and hard of hearing individuals, they may not notice or hear emergency alarms and may need to be alerted to emergency situations.
- **People who are Deaf Blind or have Low Vision:** People who are deaf blind or have low vision will need to be alerted to emergency situations. People who are deaf blind or have low vision may be familiar with their immediate surroundings and frequently traveled routes. Nonetheless, since the emergency evacuation route might be different from commonly traveled routes, people who are deaf blind or have low vision should be assisted to exit the building.

2.16. OSWD Rights and Responsibilities

OSWD recognizes that deafness and hearing disability are classified as a disability under Section 504 of the ADA laws; however, certain views identify with deafness, not as a disability, but rather as a culture.

In most cases, accommodations and special services for students who are deaf or hard of hearing tend to be consistent and uniform. At the same time, accommodations and special services can vary from university to university, depending on the type of institution and constituents served.

What makes Gallaudet University unique is the fact that it is a renowned institution of higher education for deaf and hard of hearing students. In a hearing institution, the deaf or hard of hearing student may require accommodations such as interpreting services and note taking services. Because Gallaudet employs bilingualism, all facets of academic life are fully accessible to deaf and hard of hearing students. Therefore certain accommodations, such as interpreting services and note taking services, may not provide any significant benefits unless the deaf or hard of hearing students have a disability such as low vision, deaf-blind, learning disabilities, attention deficit hyperactivity disorder, chronic illness, or physical or psychological disabilities that require accommodation.

So, while OSD recognizes that deafness or hearing impairment is considered a disability under the law, the principle activity of OSD is to ensure equal access for deaf students with disabilities.

OSD has the right to:

- Determine reasonable, appropriate, and effective accommodations on an individual basis
- Review disability documentation and assess student accommodation needs
- Modify accommodations based on a doctor's documentation in compliance with ADA and Section 504 laws

OSD has the responsibility to:

- Inform students of office location and procedures for requesting accommodations
- Accept and evaluate disability documentation to determine eligibility for OSD services
- Maintain medical, psychological, or psycho-educational documentation for each student
- Approve appropriate and reasonable accommodations
- Provide notification to faculty as directed by the student
- Maintain appropriate confidentiality of records and information pertaining to a student's disability
- Protect student privacy and confidentiality
- Ensure equal access to programs and services to students with disabilities

2.17. Helpful Attitudes & Etiquette

Appreciate Abilities: Students with disabilities, like all students, do some things well and others things not so well. Focus on what they can do rather than what they cannot do.

Wheelchair Etiquette: A wheelchair is part of a person's "personal space". Do not lean on a chair, touch it, or push it, unless asked to do so. When pushing a wheelchair, ask the person how he or she wants you to proceed. When you are talking with a student in a wheelchair, be seated so the student does not have to peer upward at you.

Architectural Barriers: Be alert to possible architectural barriers in places you want to enter with a person with a disability. If the person is on crutches or in a wheelchair, opening a door is appreciated. Also, watch for poor lighting, which may impede communication for students with low vision or those who are deaf-blind.

Elevators: When an elevator is full, consider stepping off when an individual who has mobility challenges needs access. This will help the student who uses a wheelchair or other mobility device to be on time for classes.

Asking for Help: Many students with physical challenges will ask for help when they need it. You may ask if a student needs assistance, but do not insist.

3. Information for Students

3.1. Student Rights and Responsibilities

Students have the right to:

- Be certain that all disability-related information is treated confidentially
- Receive appropriate accommodations in a timely manner from faculty and OSWD
- Obtain full and equal participation in, and access to, academic courses, programs, services, and activities on campus
- Appeal decisions regarding accommodations and auxiliary aids

Students have the Responsibility to:

- Meet the essential qualifications and institutional standards of Gallaudet University
- Disclose their disability to OSD in a timely manner
- Provide appropriate medical, psychological, or psycho-educational documentation so that eligibility for OSD services can be determined
- Inform OSD of accommodations needs
- Inform OSD immediately of any barriers that arise with a course faculty in securing accommodations
- Meet with faculty to discuss accommodations listed on the Faculty Accommodations Letter as needed
- Attend all classes as required
- Meet all the course syllabus requirements

OSD does not absolve the student of responsibilities during the time it takes to assess eligibility and arrange accommodations and special services. The student cannot use a disability as an excuse for not fulfilling the obligations and requirements of the course syllabus.

3.2. Prospective Undergraduates

If you are a new student, applying for OSD services for the first time, it is important that you submit your OSD required forms and documentation as quickly as possible so that OSD has sufficient time to review your submissions and discuss your accommodation needs for the upcoming semester. Students who will be arriving at Gallaudet University for the first time should read Section 6, “Appendix: Transition of Students with Disabilities to Postsecondary Education: A Guide for High School Educators”, to gain some understanding of the differences between high school and college for students with disabilities.

Please contact OSD if you have any questions about the intake process, need more information about our services, or have any concerns. OSD looks forward to working with you to assist in your future academic endeavors at Gallaudet University.

3.2.1. Differences between High School and University

[This section is adapted from the pamphlet, "Preparing for College: Options for Students with Learning Disabilities", Association on Higher Education and Disability, Columbus, Ohio; 2010.]

In the Law

Elementary and secondary education (through high school) is governed by the Individuals with Disabilities Education Act (IDEA), which guarantees students a free and appropriate public education. After they graduate from high school, students and their parents need to be aware that IDEA no longer applies. In all postsecondary education, including Gallaudet University, Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 require access to programs and services, and auxiliary aids and services to ensure effective communication, but do not mandate a free and appropriate education.

In the Documentation

Approval for support services will be based, at least in part, on the documentation that the student provides. It is both important and necessary that the student discuss with OSWD necessary support services and why they are needed. Decisions about qualification for support services are made by OSWD who decide on appropriate accommodations. Individualized Education Plans (IEPs), familiar from prior years, are no longer in force and may only be used as a general guideline for services. Documentation under Section 504 plans must state a specific disability to be considered as guidelines for support services as well. Documentation may include diagnostic test results, clinical assessments, IEP, Comprehensive Individualized Assessments (CIA), medical documentation, speech and language evaluations, and vocational rehabilitation documentation.

In the Services Provided

Students should not expect that the services and curriculum modifications provided in high school will be automatically provided at the university level. The university has the right to approve or deny services requested by the student which are not reasonable or which constitute an undue burden. In addition, it is important to know that colleges and universities are not required to modify or waive courses or program requirements, although course substitutions may be considered as an academic adjustment where appropriate. An

“otherwise qualified” student should have completed the necessary prerequisite college preparation courses in high school and should be ready to continue with reasonable support.

In the Advocacy

In high school, school personnel are required to seek out students with disabilities and help them to receive a free and appropriate education. During high school, the student's parent or guardian is legally responsible for making decisions about the student's education. In contrast, universities are not required or expected to seek out students with disabilities. It is the student who is responsible for making all disclosures and contacts, not the student's parents or guardian. It is the student who is in charge of all educational decisions.

The Decision to Disclose

The student may choose to disclose a disability on a university application, but the student is not required to disclose a disability. Disclosure may help explain deficits in an application that may be a direct result of a disability. In the past, students have found that disclosing a disability has generally helped obtain acceptance for an application. Regardless, the student must consider disclosing a disability and registering with OSWD once on campus if the student will be seeking accommodations.

3.2.2. Getting Off to a Good Start

All prospective students are encouraged to make initial contact with OSWD in the early stages of their college planning, well before arriving on campus, particularly if they have questions about what documentation is required for disability eligibility purposes. OSWD will send information about services and documentation requirements to help the student prepare.

At any time during the admissions process, students are invited to meet with OSWD counselors to gather information about eligibility for disability support services and accommodations, appropriate documentation of disabilities, housing considerations, and transition issues.

3.2.3. Forms

To apply for OSWD services, please see the OSWD section of the Gallaudet University website to download the appropriate forms.

3.3. General Information Regarding Student Accommodation

3.3.1. Reasonable Accommodation

Reasonable accommodation refers to academic resources and disability services provided to students with disabilities without undue hardship to the University. Faculty may be expected to provide alternative accommodations or special services so long as these are reasonable and achieve the desired student outcome.

Many types of accommodations are discussed in further detail in Section 2, "General Information", of this handbook. This section highlights accommodation information of special interest to students with disabilities.

3.3.2. Student Disclosure

OSWD students have the right to choose not to use accommodations and not to disclose their disabilities to the University's faculty or staff. However, it is the student's responsibility to request accommodations through OSWD in a timely manner, should s/he determine during the semester that disability support is needed.

3.3.3. Accessibility Procedures

OSWD students may encounter barriers, temporary or permanent, that limit their access to using classrooms, such as an automatic door not opening, a broken wheelchair lift, other architectural barriers, or poor-lighting concerns. A student who experiences difficulties on campus with accessibility should either complete the "Accessibility Repair Request Form" that can be found in the OSWD section of the Gallaudet website, or contact directly any of the departments below for assistance.

For challenges with architectural barriers, such as crosswalks that are not aligned with curb cuts, challenges with ramps, pathways, crosswalks, roadways, edges or crosswalk markings, doors that are too narrow for wheelchair access, or wheelchair lifts that are broken,

email <facilities@gallaudet.edu> (Facilities Service Center) and send a Cc: to <patricia.tesar@gallaudet.edu> (OSWD director).

For problems accessing buildings such as opening doors, or with push plate issues such as buttons on the doors that do not work, email <dps.locksmith@gallaudet.edu> (Department of Safety and Security) and Cc: to <patricia.tesar@gallaudet.edu> (OSWD director).

For challenges accessing tables, chairs, or desks in a classroom, email the assigned OSWD counselor for assistance and Cc: to <patricia.tesar@gallaudet.edu>.

For accessibility challenges in the dormitory environment, email <susan.hanrahan@gallaudet.edu> and <nikki.surber@gallaudet.edu> with Cc: to <patricia.tesar@gallaudet.edu>.

OSWD will follow up on all student concerns, but we also encourage the student to meet with his or her OSWD counselor and follow up with the above departments with regard to accessibility requests. Gallaudet University is working diligently to increase accessibility for students with disabilities and welcome help from students on these issues.

3.3.4. Adaptive Technologies (Hardware & Software)

There is a variety of adaptive technologies, both hardware and software, available to students with disabilities. Some students may need to type their tests on a computer with or without special software. In some cases, students may use their own computer; in other cases, they may need to use a computer on campus.

- Department-owned computers are managed by the respective departments, which are responsible for managing specialized hardware and software on those computers. Gallaudet Technology Services can assist departments with purchasing needed hardware and software.
- Gallaudet Technology Services is responsible for the purchase, installation, and maintenance of computer hardware and software in University managed classrooms.
- Two public computer labs are supported by Gallaudet Technology Services: the Harkin Lab located in JSAC 1100 and the Computer Lab located in HMB W121.

- All other spaces where technology is used such as libraries and dormitories are managed by departments or services occupying that space.
- Specifically, OSWD is responsible for purchasing, installing, and maintaining all adaptive technologies used within the OSWD department.

3.3.5. Adaptive Furniture

If classroom tables, desks, and chairs are not accessible, a student may contact OSWD to arrange the use of adaptive furniture, such as raised or adjustable-height tables, or ergonomic or adaptive chairs, for use in the classroom. Loan of adaptive furniture is for the student's use only and can only be arranged for classes for which the student is actually registered. The student requesting the use of adaptive furniture will discuss needs with an OSWD counselor to find the best possible solution. The student will provide the necessary documentation to establish eligibility and, if the student drops the class the loan of the adaptive furniture will be discontinued.

3.3.6. Assistive Listening Devices (ALD)

Some students who are hard of hearing may require an assistive listening device. Each device is different. In most cases, unless there is an audio system in the room that has a built in ALD, the faculty member will be required to wear a small device with a microphone so that the student can hear. It will be important for the professor to repeat any comments from other members of the class.

OSWD students who are in need of assistive listening devices should discuss this request with their OSWD counselor. OSWD will work with the student and the academic dean to resolve accommodation requests.

3.3.7. Service Animals

Gallaudet University does not permit pets anywhere on campus. However, service animals—strictly meaning dogs that are individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability—are permitted on campus and in public facilities where the University community and members of the public are normally allowed, including food service areas. Note:

dogs used for emotional support do not meet the definition of service dogs and are not permitted on the Gallaudet campus. Long-term users of service animals, whether faculty, teachers, staff, or students, are required to register the animal with the Department of Public Safety. Contact <dps@gallaudet.edu>.

3.3.8. Wheelchair Loaners and Repairs

Wheelchairs are considered personally owned items. OSWD students who use powered wheelchairs on campus are responsible for their care and maintenance. OSWD strongly advises students using powered wheelchairs to keep in their dorm a battery charger, a back-up battery, and a manual wheelchair in case their powered equipment fails.

Students who experience a wheelchair breakdown while traveling on campus should contact the Department of Public Safety (DPS) for assistance. DPS staff can gain access to the student's dorm room and the student's back-up equipment to help get the student mobile again.

OSWD does not provide loaner wheelchairs or batteries for wheelchairs, nor does OSWD repair wheelchairs. However, OSWD does maintain a referral list of companies throughout the DC Metro area that may be helpful for assistance with wheelchair rentals, repairs, and replacements.

3.3.9. Orientation & Mobility: Assessment & Training

Orientation and Mobility (O & M) services can provide students who are blind, deaf-blind, or visually impaired with skills and concepts needed to travel safely and independently around the Gallaudet University campus. Training is individualized to help each student learn the skills and concepts needed to travel safely and independently.

Training may include skills in orientation (finding destinations on campus or in unfamiliar communities, orienting oneself when lost, etc.), effective use of all remaining senses (including the kinesthetic sense), negotiating stairs and obstacles, crossing streets, using buses and transit, and problem-solving. Orientation is provided for students who already possess the skills to travel safely and independently but who want help orienting themselves to new places.

Some students might benefit from more extensive training, while others may find it useful to investigate the campus for a day or two before classes begin, with the aid of an O & M professional. Students desiring O & M training should meet with their OSWD counselor to make a request. Students new to Gallaudet University are advised to contact OSWD prior to their arrival so that orientation and mobility services can be arranged ahead of time.

OSWD collaborates with Vocational Rehabilitation and off-campus, certified O & M specialists experienced in providing O & M assessment and/or training for deaf-blind students who request services. OSWD also provides an on-campus orientation for students who are fully trained but simply need an orientation to campus.

3.3.10. Personal Care Attendants

Some students may need a Personal Care Attendant (PCA), and this PCA may be an integral part of the student's university experience and safe participation in campus activities.

The student who wishes to use a PCA:

- Must be registered with OSWD;
- Be established with OSWD as a qualified person with a disability;
- Must attest that a selected PCA is suitable for the student's needs and not a safety risk to students and employees on campus;
- Is responsible for finding a suitable replacement for a primary or backup PCA when necessary;
- Is responsible for all PCA-related decisions and all compliance with the employment and other laws applicable within the United States and the District of Columbia;
- Will pay all PCA-related costs and expenses when due, and recognizes that these costs or expenses cannot be billed to a Student Account with the University;
- Will assume full responsibility for a PCA's conduct and any resulting liability from his or her decisions, actions, errors, or omissions that harms someone else on campus;
- Will ask questions and seek out additional information if a policy, rule, or other instruction is unclear, and will cooperate

with any educational or disciplinary issue that arises during the student's academic program on campus;

- Will keep an updated emergency plan with the Residential Life staff, including contact information for the primary PCA and all potential backup PCAs, family emergency contact information, a description of appropriate ways the housing staff can provide assistance, and permission to summon emergency assistance if a PCA is unavailable;
- Is responsible for any charges incurred during an emergency situation;
- Will immediately inform OSWD and/or Residential Life staff of any PCA-use related health or safety concerns;
- Recognizes that a PCA's housing privileges are linked to the student's privileges and will expire within 24 hours of the student's departure from the dorm, and that PCA privileges can be suspended or revoked for gross misconduct, inability to perform services, or repeated violations of institutional policies and rules or conduct deemed to be criminal by local governmental authorities; and
- Waives any and all claims against Gallaudet University and its employees or agents arising from actions, errors or omissions by any attending PCAs, or when the student is unattended by a PCA.

Gallaudet University:

- Does not provide PCA services;
- Does not assist with screening or selecting appropriate PCAs for particular students;
- CAN allow access for a PCA to live in dorms or, when the PCA is from an agency, come and go on shifts;
- Cannot provide for a student's daily needs if a PCA is unable to do so;
- Cannot assume any financial responsibility for paying for PCA services, or for accepting money for paying for PCA services;
- Requires comprehensive health insurance for full-time students, but is not responsible for purchasing or evaluating any personal health insurance policy for any particular student; and

- Is not responsible for the theft, damage, or other loss to the student's or PCA's personal property.

Further details about arrangements for using a PCA can be found in the OSWD section of the Gallaudet University website.

3.3.11. Leaving the classroom when symptoms occur

Some students with medical conditions may need to leave the class if problems due to their medical condition occur. It is recommended that students who have issues during class, email or contact their professor as soon as possible after the incident occurs and then work with the professor to make up any missed work. If this happens frequently, OSWD recommends that the professor talk with the student and also talk with OSWD to determine appropriate action.

3.4. Resources

3.4.1. Success Tips for Students

If you, the student, know you have a learning disability, talk with OSWD **before** the semester begins. If you think you may have a learning disability but aren't sure, contact OSWD to learn about assessments and options.

- Set realistic goals and priorities for course work.
- Be prepared to request “reasonable accommodations” in your course work so you can learn and demonstrate your knowledge of course material. This is your right under Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disabilities.
- Become knowledgeable and comfortable about describing your disability so you can advocate for yourself with faculty.
- Look into different types of assistive technologies that can help you with your note taking, reading, or mathematical abilities.
- Keep only one calendar with all relevant dates, assignments, and appointments. Do not try to keep a schedule in your head.
- Plan to attend all class sessions; attendance may seem trivial, but it is important.

- Estimate how long a given class assignment will take, generally planning on two hours outside class for every hour in class. Build in study breaks; fatigue wastes time.
- Make notes of any questions you might have so that they can be answered before the next exam.
- Attend all review sessions offered by the professor or teaching assistants.
- If you are having trouble or feeling overwhelmed, talk with OSWD immediately. Do not hesitate to seek help. It is critical that you link-up with campus supports before you fall behind in your course work.

3.4.2. Requesting an Incomplete for a Course

Incomplete grades are arranged and approved by the faculty teaching a course. Incomplete grades are only given when a student is unable to fulfill required course work because of extenuating circumstances, which may include illness or be related to a student's disability. A student will not receive an incomplete for poor or failing work, or for willful non-attendance of class. Receiving an "INC" on a grade report allows the student to complete the course in the following semester; failing to complete the course will result in a final grade of "F".

When requesting an incomplete grade for a specific course for reasons related to the student's disability, the student may ask that the faculty member be sent an "Incomplete Letter of Support" from the student's OSWD counselor, who will verify that the request is disability related, without specifying particular reasons. This letter will remain on file with the Registrar for up to 6 months and then it will be destroyed when the "INC" is changed to a final grade; it will not be part of the student's permanent academic record. While OSWD can recommend that a faculty member grant an incomplete grade to a student based on the student's disability, the final decision is entirely up to the faculty member.

To request a letter in support of an incomplete, the student should meet with her or his OSWD counselor.

3.4.3. Scholarship Information

OSWD recognizes that there are disability-related costs a student faces, above and beyond tuition, fees, room and board. OSWD

students often have to deal with additional expenses not incurred by other students. They may include the cost of specialized adaptive equipment, expenses for personal use (such as readers or attendant care providers), transportation costs necessary to pursue an academic program, and medical expenses relating directly to the student's disabilities that are not covered by insurance.

OSWD makes every effort to provide financial assistance to students who are able to demonstrate that they are in need of assistance in order to continue their education at Gallaudet University. Staff members at OSWD work closely with on-campus departments and off-campus organizations and state agencies to help students receive the optimal benefits for which they are eligible.

The Newcombe Scholarship Foundation, a privately funded scholarship organization, provides financial assistance to deaf students with disabilities who qualify for funding. A needs-based scholarship, Newcombe funds are awarded to eligible students each academic semester. Contingent upon semester's funds, students may receive up to \$2,000 per semester.

3.4.4. Student Advisory Board and Accessibility Requests

The OSWD Student Advisory Board (SAB) was established to address student concerns regarding accessibility on campus and give students more control over their efforts to affect change. The SAB advises OSWD and the campus community on accessibility issues that may require attention and action. It provides a safe space for students to express concerns about any accessibility issue they encounter on the Gallaudet campus.

Students who serve on the SAB will:

- Be an OSWD registered student;
- Maintain at least a 2.0 GPA;
- Maintain active involvement in OSWD (must have completed a Faculty Accommodations Letter, an OSWD Support Service Plan, and have had at least 3 contacts with OSWD in a semester); and
- Be interested in advocating for the rights of disabled students on the Gallaudet campus.

Responsibilities of the student SAB member include:

- Making a one year commitment to the SAB;
- Attending all monthly SAB meetings;
- Assisting with setting goals and action plans for the SAB;
- Following up on action plans to achieve the SAB's goals;
- Evaluating the progress of the SAB at the end of each semester; and
- Setting future direction for the SAB.

Any Gallaudet student may make an accessibility request or raise an issue; the OSWD section of the Gallaudet website has forms for this purpose, or the student may contact OSWD. Any student who might like to serve on the SAB should contact OSWD to express an interest.

3.4.5. Section 504/ADA Student Grievance Procedure

The Americans with Disabilities Act prohibits the exclusion of people from jobs, services, activities, or benefits based on disabilities. In addition, Section 504 of the Rehabilitation Act of 1973 states that no otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Further, it specifically ensures that no qualified individual with a disability shall, on the basis of disability, be subjected to discrimination under any program or activity that receives federal financial assistance.

The Gallaudet Section 504/ADA Student Grievance Procedure may be initiated by any students who believe they have been discriminated against, in violation of the Acts. Students should follow the procedures described below. In addition, the Procedure may be used to hear any student grievances concerning reasonable accommodation, including course waivers or substitutions due to a disability, or to appeal accommodation determinations by OSWD.

Detailed steps for invoking the Grievance Procedure can be found in the OSWD section of the Gallaudet University website.

3.5. FAQs

3.5.1. Where can I find information about Section 504, ADA and ADAA?

The following links may be useful:

- ADA Home Page: <http://www.ada.gov/>
- ADA Responsibilities for Postsecondary Institutions Questions and Answers:
<http://www.pacer.org/publications/adaqa/504.asp>
- Disability.gov: <https://www.disability.gov/>
- Department of Education's Office for Civil Rights (OCR) pamphlet: "Students with Disabilities Preparing for Postsecondary Education: Know Your Rights and Responsibilities":
<http://www2.ed.gov/about/offices/list/ocr/transition.html>
- Association on Higher Education and Disability:
<http://ahead.org/>

3.5.2. What if I am failing one of my classes?

Providing accommodations to a student with a disability does not guarantee academic success. The provision of accommodations levels the playing field, so that students with disabilities have the same access to programs and activities as their non-disabled peers. Students with disabilities must be given the equal right to fail, as any other student, as part of their educational experience. Students experiencing academic difficulties are encouraged to contact their faculty members, academic advisor, and their OSWD counselor for assistance.

3.5.3. I am receiving notes, but I have missed most of the classes. Can I still get these notes?

Students with disabilities must attend classes in order to receive Note Taking Services assistance. Their accommodation does not excuse their absences.

4. Information for Faculty

4.1. OSWD Statement on Syllabi

The Office for Students with Disabilities recommends that all faculty members use the following statement on their course syllabi to inform students with disabilities of the faculty member's willingness to provide reasonable accommodations.

Gallaudet University is committed to providing all students equal access to learning opportunities. The Office for Students with Disabilities (OSWD) is the campus unit that works with students who have disabilities to provide and/or arrange reasonable accommodations. Students registered with OSWD, who have a letter requesting accommodations, are encouraged to contact the professor prior to the start of the semester. Students who have, or think they may have, a disability such as a psychological disorder, an attention deficit disorder, a learning disability, low vision loss, are deaf-blind, have a physical disability, or a chronic disability, are invited to contact OSWD for confidential guidance and consultation. Students may call 202-250-2059 (VP), or 202-651-5256 (V) or email OSWD at <oswd@gallaudet.edu>. OSWD is located in the Student Academic Center, room 1220. Additional information is available at the OSWD section of the Gallaudet website.

4.2. Faculty Rights and Responsibilities

A faculty member who suspects that a student has a disability is encouraged to refer the student to OSWD for assistance.

Faculty members are encouraged to involve OSWD to mediate certain student disputes relevant to disability issues and accommodations. Often such meetings result in proactive solutions improving upon accommodations and accessibility.

Faculty members must refrain from personal judgments that affect the student's right to receive accommodations and special services. It is the student's right to receive identified accommodations for which the student has been qualified.

Faculty has the Right to:

- Deny a request for accommodations if the student has not been approved for such accommodations.
- Request verification of a student's eligibility for any requested accommodations. Such verification will be in the form of a

letter written by OSWD delivered directly to the faculty member. OSWD is the only office on campus designated to review disability documentation and determine eligibility for appropriate accommodations.

- Make suggestions for appropriate academic accommodations.
- Contact OSWD on questions regarding a student's accommodations.
- Refuse to provide an accommodation, academic adjustment, or auxiliary aids not approved by OSWD.
- Identify a testing site other than OSWD as long as accommodations meet the student's needs.

Faculty has the Responsibility to:

- Ensure that each course, viewed in its entirety, is accessible in regard to content, texts and materials, assessment method, on-line instruction, and team requirements.
- Support and implement reasonable accommodations as identified in the student's Faculty Accommodations Letter.
- Consult with OSWD if requests conflict with course objectives or requirements.
- Maintain confidentiality. Faculty are encouraged to meet with the OSWD student privately to discuss disability issues. Such issues should not be openly discussed in class.
- Submit book lists to the bookstore as early as possible.
- Include an announcement on the syllabus directing students to OSWD if they need accommodations related to a disability.
- Submit books and class materials to OSWD for alternative formats, i.e., Braille, large print, raised line drawings, and eBooks.
- Fill out and submit special testing service request forms to allow the student to take an exam at the OSWD testing site.

4.3. Understanding Disability Types

By law, a person “with a disability” is someone who has physical or cognitive impairment that substantially restricts one or more major life activities. Gallaudet University serves more than 200 students with disabilities each academic semester. Students on the Gallaudet campus may have the following types of disabilities:

- Learning disabilities
- Attention-deficit hyperactive disorder (ADHD)
- Autism Spectrum Disorders and Asperger's Syndrome
- Deaf-blind
- Low vision
- Neuro-muscular disabilities
- Psychological disabilities
- Chronic illnesses

4.3.1. Learning Disabilities and Attention Deficit Hyperactivity Disorder

[Parts of this section were adapted from the pamphlet "College Students with Learning Disabilities", Association on Higher Education and Disability, Columbus, Ohio, 2011.]

Learning Disabilities

Learning Disabilities (LD) is a general term that refers to a heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of communication, reasoning, or mathematical skills.

- Learning Disabilities are a presumed neurological disorder which affects the manner in which individuals with average or above-average intelligence have an unexpected difficulty taking in, retaining, and expressing information. It is commonly recognized as a significant deficit in one or more of the following areas: oral and signed expression, written expression, basic reading skills, reading comprehension, or mathematical calculation.
- Manifestations of LD vary from individual to individual. Specific subtypes include: Dyslexia, Dysgraphia, Dyscalculia, and Non-Verbal LD.
- Learning differences are not synonymous with LD. Differences in approaches to learning are the norm rather than the exception.
- Test scores alone do not determine the presence or absence of an LD. Ability-achievement discrepancy scores should not be the sole determinant of an LD diagnosis.

- LD does not result from poor instruction, cultural, environmental, or economic disadvantage; LDs can occur across a variety of cultural and linguistic backgrounds.
- LD may persist throughout life but the problems manifested may change depending upon the learning demands and the setting. It may cause problems in grade school, seem to disappear during high school, and then resurface again in college. It may manifest itself in only one academic area, such as math or foreign language, or impact an individual's performance across a variety of subject areas and disciplines.
- Because LD is not visible, teachers, parents, and peers often do not understand the challenges faced by individuals with learning disabilities. Consequently, many adults with learning disabilities often have to “prove” to others that their invisible disabilities are significantly challenging.

Attention-Deficit Hyperactivity Disorder (ADHD)

ADHD is a diagnosis applied to children and adults who consistently display certain characteristic behaviors over a period of time. The most common core features include:

- Distractibility (poor sustained attention to tasks)
- Impulsivity (impaired impulse control and delay of gratification)
- Hyperactivity (excessive activity and physical restlessness)

In order to meet diagnostic criteria, these behaviors must be excessive, long-term, and pervasive. As with other disabilities, ADHD substantially restricts one or more major life activities for the student. These criteria set ADHD apart from the "normal" distractibility and impulsive behavior of childhood, or the effects of the hectic and overstressed lifestyle prevalent in our society.

Characteristics of College Students with Learning Disabilities and Attention Deficits

College students with learning disabilities and/or attention deficits are intelligent, talented, and capable. Typically, they have developed a variety of strategies for compensating for their learning disabilities. However, the degree of severity of the disability varies from individual to individual.

A. Cognitive Processing

Students with LD may have difficulty with the underlying cognitive processes that involve the acquisition, application, integration, and expression of information. These may include difficulties with:

- Visual processing
- Auditory processing
- Speed of processing
- Perceptual and quantitative reasoning
- Expressive and receptive language

B. Executive Functioning

Students with LD may have difficulty with executive functioning tasks such as planning, organizing, decision-making, self-monitoring, and evaluating the effectiveness of learning. These may manifest themselves as difficulties with:

- Working memory and recall
- Managing time and space
- Concentration/attention
- Problem solving
- Critical thinking

C. Academic Achievement

Learning disabilities can affect one or more areas of academic achievement such as reading, writing, expressive and receptive language, math, science, and technology.

Reading Skills

Students with LD may have problems in one or more of the following:

- Slow reading rate and/or difficulty in modifying reading rate in accordance with material's level of difficulty.
- Uneven comprehension and retention of material read.
- Differentiating the main idea from supporting details.
- Following multi-step written directions.
- Difficulty reading for long periods of time.

Writing Skills

Students with LD may have problems in one or more of the following:

- Getting started with writing assignments.
- Difficulty planning a topic and organizing thoughts on paper.
- Difficulty with sentence structure (e.g., incomplete sentences, run-ons, poor use of grammar, missing inflectional endings).
- Frequent spelling errors (e.g., omissions, substitutions, transpositions), especially in specialized and foreign vocabulary.
- Difficulty effectively proofreading written work and making revisions.
- Generating compositions and essays of sufficient length.
- Slow written production.

Expressive Language Skills

Students with LD may have problems in one or more of the following:

- Inability to comprehend signed language when presented rapidly.
- Difficulty in expressing concepts through sign language that they seem to understand.
- Difficulty following or having a conversation about an unfamiliar idea.
- Trouble telling a story in the proper sequence.
- In conversation, find retrieving specific words challenging despite good comprehension of the words.

Math and Science Skills

Students with LD may have problems in one or more of the following:

- Incomplete mastery of basic facts (e.g., mathematical tables).
- Accurately reading numbers and symbols in assignments (e.g., confusing 6 for 9, or operational symbols such as + and ×).
- Numeration (e.g., measurement, estimating size and distance, directionality, telling time, and performing conversions).
- Following all the logical steps in problem solving.
- Reading and comprehending word problems.
- Self-monitoring for accuracy of the answer for a math or science problem.

D. Technology Skills

Given the proliferation of online and blended courses in college, competencies with instructional and learning technologies are essential for all college students, including students with LD. Students with LD may have problems in one or more of the following areas with technology and the use of the Internet:

- Conducting an Internet search (e.g., knowing how to identify effective search words and phrases, knowing when to stop searching, not being distracted by links, animation, symbols, and pop-ups).
- Deciphering authentic, peer-reviewed information from personal opinions posted online.
- Resisting click-copy-paste of information without concerns for plagiarism.
- Being able to remain focused and on-task amidst many distractions online.
- Knowing how to use social media such as Facebook and Twitter safely and effectively.
- Navigating the University's specific course authoring tools and online systems for course registration, financial aid, tuition payment, and online courses.
- Being able to problem-solve common computer malfunctions.
- Keeping positional memory while reading off a computer screen (e.g., not being distracted while having to scroll to find information).
- Keeping up with specific requirements of online courses such as time-management, participation in real time discussions and pace of online postings.

E. Social Skills

Many students with LD may have limitations in social skills which spill over into relationships with others. Students with LD may have problems in one or more of these social-skill areas:

- Interpreting what others are saying (e.g., interpreting information too literally).
- Understanding non-verbal messages and detecting sarcasm or irony (e.g., body language)

- Self-advocacy skills (e.g., speaking up for themselves with faculty, roommates, and other campus personnel).
- Self esteem (e.g., demonstrating characteristics of learned helplessness by assuming that circumstances cannot be changed; feeling a lack of control over a situation).
- Self-monitoring behavior, social perception, and social interaction. These may co-occur with LD, but not, by themselves, constitute an LD.

University students with LD who have weak social skills often have parents who have managed their social agenda for them in high school and may feel obliged to do the same in college (“helicopter parents”).

Suggestions for Faculty

Faculty play a critical role in helping students who may have learning disabilities and attention deficits by referring them to OSWD. Once identified, faculty can develop accommodations that will permit students with learning disabilities to fully access lecture and course materials.

- Encourage students to make an appointment during office hours to self-disclose to you confidentially. Ask students who identify themselves how you, as a faculty member, can assist in facilitating course material.
- Provide students with a detailed course syllabus. Clearly spell out course objectives and expectation, make well-defined links between objectives and specific assignments, provide detailed grading rubrics, and give topic timelines with due dates.
- Communicate assignments in multiple formats to prevent confusion.
- To assess student learning, include opportunities for students to demonstrate content knowledge and learning in multiple ways.
- Anticipate diversity and create an instructional environment guided by the principles of Universal Design, with you as the designer.
- Consider using digital tools to foster inclusive instruction with multimedia options such as podcasts, screen captures, YouTube videos, readings with hyperlinks, and embedded prompts.

- Consider providing students with tips from the professor on characteristics of an “A” student.
- Provide, in advance, study questions for exams that illustrate the format, as well as the content of the test. Explain what constitutes a good answer and why.
- Include a link to software that helps students self-monitor for plagiarism, which can be a concern in the digital age.
- Start each class with a review of material that was covered in the previous session and a preview of material to be covered in the current session.
- Take steps to create a “community of learners” whether online or in face-to-face classrooms to help all students feel included. This can be accomplished by providing explicit guidelines for group work, collaborative projects, etiquette for email, and other forms of digital communication.
- Incorporate evidence-based teaching practices that include: giving frequent and constructive feedback, engaging every learner, modeling and demonstrating good learning behavior, fostering metacognitive awareness by asking students to explain their reasoning behind use of a particular strategy, repeating information, and creating situations for positive encouragement, whenever appropriate.
- Encourage students to work with OSWD about available support services.

Strategies for teaching the ADHD student:

- Provide extra time for testing.
- Allow testing to take place in a separate and quiet place.
- Allow testing to take place in several sessions.
- Realize the student may benefit from using Note-Taking services.
- Give instructions in writing, so they can be referred to easily.
- Offer student seating, where possible, in quiet areas, away from doors, windows, or other distractions.
- Allow extra time to complete assignments.
- Break long assignments into smaller segments.
- Give assignments one at a time to avoid overload.

- Acknowledge positive behavior in the ADHD student and classroom peers.
- Review instructions on new assignments to aid comprehension.

4.3.2. Autism Spectrum Disorders (ASD) and Asperger's Syndrome (or High-Functioning Autism)

Autism Spectrum Disorders (ASD) are developmental disorders that affect the brain's development; they are characterized by challenges with social interactions, poor communication skills, and the development of repetitive patterns of behavior, interests, and activities. Asperger's Syndrome, now to be known as “High-Functioning Autism”, is considered an Autism Spectrum Disorder. Students with ASD may have high intellectual and verbal abilities and yet be socially awkward.

Some characteristics that students with ASD may exhibit to a greater or lesser degree:

- Frequent errors in interpreting others' body language, intentions, or facial expressions
- Difficulty understanding the motives and perceptions of others
- Problems asking for help
- Difficulty making friends, or working in small groups
- Motor challenges, unusual body movements and/or repetitive behavior
- Difficulty seeing the big picture from too much focus on details
- Decided preference for routines
- Problems organizing information and tasks
- Challenges with abstract thinking (focus on irrelevant details, difficulty generalizing)
- Distraction in bright or noisy environments; may experience sensory overload, particularly during tests

Tips for teaching students with ASD:

- Point out the organizational items in textbooks, e.g., chapter summaries, sub-headings, graphic design, charts, maps, and indexes

- Communicate assignments and course expectations in written and signed formats
- Incorporate hands on experiences when they are appropriate
- Give students a clear syllabus, listing tests and assignments, and note due dates specifically
- Make sure expectations are direct and explicit; don't expect the student to generalize from instructions
- Include time for questions and answers
- Establish rules if the student invades your space or imposes on your time
- Keep directions simple and declarative
- When group projects are called for, consider putting the student with ASD in a smaller group

4.3.3. Deaf-Blind

Students who are deaf-blind may face access and inclusion challenges at the post-secondary level. These challenges may impinge on overall student adjustment and satisfaction with the university experience.

Areas that may be of concern when teaching a deaf blind student could be issues of full and equal access to all class materials, safety, mobility, communication, social interaction, and inclusion in class discussions.

Students may be deaf blind from birth; others may be born deaf or hard of hearing and become blind later in life. Still others may be adventitiously deaf blind—that is, they are born with both sight and hearing but lose some or all of these senses as a result of accident or illness.

Deaf-blind is sometimes accompanied by additional disabilities. Causes of deaf-blind such as maternal rubella can also affect the heart and the brain. Some genetic syndromes or brain injuries that cause deaf-blind may also cause cognitive disabilities and/or physical disabilities.

Many deaf-blind students use a combination of assistive aids including tactile interpreting, note taking, Braille books, eBooks, and various assistive technologies.

Helpful hints for teaching deaf-blind students:

- Choose classroom texts early so that ample time is available for OSWD to prepare Braille versions.
- Arrange seating that accommodates the deaf-blind student and the need for tactile interpreting.
- Plan for field trips requiring interpreters or other necessary accommodations.
- If any room changes occur, be sure to announce these changes.
- Use alternative formats for complex assignments.
- Provide hands-on experiences and use manipulatives.
- Give the student plenty of advance notice about turning in projects.
- Keep paths and work surfaces clear.
- When interacting with students, indicate to the student when you arrive or leave an area; explain unusual occurrences.
- Set up in-class communication rules to avoid confusion in identifying who is speaking.
- Be open to suggestions about how best to be accommodating.

4.3.4. Usher Syndrome

The number of deaf-blind students attending Gallaudet University has gradually increased over the past few years. The term “deaf-blind” encompasses a range of combinations of hearing and vision loss. Some students may have residual vision that they rely on in class; others may have central vision but not peripheral vision, and so forth. You may encounter students on the Gallaudet University campus who indicate that they have Usher Syndrome.

“Usher syndrome” is the most common condition that affects *both* vision and hearing. The major symptoms of Usher syndrome are hearing loss and an eye disorder called “retinitis pigmentosa”, which causes reduced light sensitivity and a loss of peripheral vision through the progressive degeneration of the retina. As retinitis pigmentosa progresses, the field of vision narrows until only central vision remains. Many people with Usher syndrome also have significant balance problems.

Strategies for accommodating students with Usher Syndrome in the classroom may include:

- Sign at a steady pace; keep in mind that interpreters must describe any visual information that you present.
- Reduce unnecessary movement while teaching.
- Practice clear turn-taking in the classroom. Remind other students to raise their hands and identify themselves before speaking. Point or gesture to direct attention to the speaker.
- Allow time for interpreters to finish before moving on to another speaker.
- Avoid unnecessary media or handouts.
- Avoid wearing clothing with busy patterns or excessive jewelry.
- Avoid unnecessary changes of light. It is common to flip light switches to gain students' attention, but deaf-blind students are sensitive to sudden light changes. An alternative, such as foot stomping or student-contact “tree” might be more effective.
- For all classroom tasks, students may need additional time to complete the same work as their peers.
- Provide group instruction from a non-cluttered background area, and avoid unneeded movement; windows should be behind students.
- Students may need individual copies of wall-hung graphs or charts, or they may need time to examine these charts close-up.
- Others may have to adapt their sign language to adjust to the student's limited vision. Keep signs as small and concise as possible, and increase the duration of each sign. Eventually, tactile sign language may be an option.

4.3.5. Low Vision

Between 70 and 80 percent of all legally blind persons in the United States have measurable vision. The student with low vision may meet academic challenges in much the same way as the deaf blind student. This may include the use of close vision interpreting, note takers, large print materials, eBooks, raised line drawings, and other assistive technologies.

The faculty should keep in mind that each student with low vision has a unique set of visual abilities and should not be compared to other students with similar visual abilities.

- Prioritize seating for the student with low vision so the student can see the professor, interpreter, and classroom activities.
- Provide lecture notes either as handouts or in electronic format upon the student's request.
- Recognize the time required by OSWD to convert a message from its original language into large print or eBook formats.
- Clearly describe visual aids used during lectures.
- Make sure the classroom has adequate lightning.
- Use dark markers on the whiteboard, and other tactics for increasing high-contrast readability.
- If any room changes occur, be sure to announce these changes.
- Give the student plenty of advance notice about turning in projects.
- When interacting with students, indicate to the student when you arrive or leave an area; explain unusual occurrences.
- Set up in-class communication rules to avoid confusion in identifying who is speaking.
- Be open to suggestions about how best to be accommodating.

4.3.6. Neuro-Muscular Disabilities

Neuro-muscular disabilities result from the partial or total loss of the function of some part of the body that impedes mobility. Students with mobility challenges may experience muscle weakness, poor stamina, a lack of muscle control, or total paralysis, and possibly require the use of a wheelchair.

Access is a major concern of the student who uses a wheelchair. The student must learn routes to and from classes and across campus that do not present barriers. A barrier may be a staircase, a curb, a narrow walkway, a heavy door, an elevator door that has no delay mechanism, a vehicle blocking a curb cut or ramp, or a sign in the middle of what would otherwise be a wide enough walkway. OSWD is committed to working with students to remove access barriers on the Gallaudet campus.

Theater-type classrooms may present difficulties unless there is a large enough flat floor space in the front or rear of the room for a wheelchair to park, and there must also be an entrance on that level.

Classrooms with tables are more accessible to students in wheelchairs; it is better if the tables and chairs are movable rather than stationary.

- A person with mobility challenges may use special assistive devices with extra space or power requirements.
- Faculty with an inaccessible office can offer to meet the student in a different location; ask OSWD to facilitate arrangements.
- OSWD may request a class location change through the Registrar's Office to accommodate students in wheelchairs.
- If breaks between classes are short, less than ten minutes, it may be difficult for the student to get to class on time.
- Adjustable tables and adaptive chairs are available for classroom use through OSWD.
- If a field trip is involved in your course work, ask the student to participate in the planning to make the experience accessible.
- In lab classes it may be necessary to make some modification of the workstation. Considerations include under-counter knee clearance, horizontal working reach, and aisle widths. Once a modification has been made, subsequent students can usually use it.
- Help maintain wide aisles and uncluttered work areas.
- Give assistance only if the student asks for it.
- Check emergency exits and routes and provide assistance as necessary.
- Remember that a wheelchair is part of the person's body space.

4.3.7. Psychological Disabilities

One in every ten persons in the United States has some form of psychological disorder with varying degrees of severity. Psychological disturbances are grouped into a number of categories including psychoses, mood, organic brain syndromes, substance abuse, and personality disorders. Psychological disabilities can easily be “invisible”. Students may have psychological disabilities that are not easily detected. A common psychological disability among college students is depression, whether long-standing or temporary in nature. Anxiety is another prevalent psychological disability among college students and may also be a reaction to stress.

- Some students may show fluctuations in behavior and academic performance, particularly as a reaction to changing medications, although this does not excuse disruptive behavior in the classroom.
- Be aware that levels of support needed by the student may fluctuate; many psychological illnesses are episodic.
- Ask what support the student may need; the student is the expert on what accommodations will make a difference.
- Understand the facts about the disability. Do not pre-judge or assume that a student is unmotivated or lazy.
- Discuss any inappropriate behavior with the student privately and forthrightly, delineating the limits of acceptable conduct.
- Exams can be particularly stressful for a student with a psychological disability; speak ahead of time with the student about appropriate expectations and strategies.
- Testing in a quiet, distraction-free environment may be appropriate, and can be arranged with OSWD.
- Allow extra time for tests and complicated assignments.
- Assist the student with time-management and study skills.
- Encourage the use of relaxation and stress-reducing techniques during exams.
- Remember to maintain the student's confidentiality.

4.3.8. Chronic or Episodic Disabilities

The terms “chronic illness,” “systemic illness or disability,” and “medical conditions” refer to any of a number of health-related conditions that may affect the respiratory, neurological, circulatory, or immune systems of the body. The symptoms associated with these conditions are often unstable and unpredictable and may be episodic. Conditions referred to by these labels can include:

- Autoimmune disorders (lupus, rheumatoid arthritis)
- Blood disorders (sickle cell anemia, e.g.)
- Cardiac disorders
- Crohn's disease
- Diabetes
- HIV/AIDS
- Lyme's disease

- Multiple Sclerosis, Muscular Dystrophy
- Pain Conditions
- Recurrent cancer
- Respiratory conditions (asthma, cystic fibrosis)
- Seizure Disorders, Epilepsy

A chronic disease or medical condition can adversely affect an individual's ability to perform a number of major life activities and, if substantial, would therefore be described as a disability. In other cases, side effects of medications or combinations of symptoms from various conditions can impair major life activities such that the person is considered disabled.

Accommodations for students with chronic illnesses might include:

- Priority scheduling to work around treatment regimens, personal care needs, medication schedules, variations in energy level and pain
- Flexibility in scheduling classes, tests, and exams
- Early access to course syllabus and assignments
- Frequent breaks during classes
- Allowance for snacks and/or access to a refrigerator
- Appropriate assistive technology

[Parts of this section were adapted from the pamphlet "College Students who have Chronic or Episodic Disabilities", Association on Higher Education and Disability, Huntersville, NC.]

4.4. FAQs

4.4.1. Am I accommodating enough?

This is a question often asked; for more information, read the article, "When Faculty are TOO Accommodating!" by Dr. Jane Jarrow, President of Disability Access Information and Support. The article may be found at the Catholic University of America's Disability Support Services website: <http://dss.cua.edu/ProvidingEqualAccessintheClassroom/whenfacultyaretooaccommodating.cfm>.

4.4.2. What if a student is disruptive in class?

The ADA does not exempt students with disabilities from disciplinary action for disruptive behavior, even if the behavior is due to a disability. The University must apply the same disciplinary actions to students with disabilities as those applied to non disabled students as listed in the Student Code of Conduct.

4.4.3. How do I inoffensively suggest a student may have a disability?

Simply suggest that the student schedule an appointment with OSWD to discuss further the challenges the student is currently facing. OSWD will identify next steps in the eligibility process. This may entail referring the student for assessment or in contacting medical or diagnostic personnel on behalf of the student.

4.4.4. What if a student is failing a class?

Providing accommodations to a student with a disability does not guarantee academic success in the course. Students with disabilities must be given the same rights as any other students to fail as part of their educational experience.

4.4.5. I am undecided about what book to use for my class, but OSWD keeps asking me to select a book ASAP. Do I have to do so?

Yes, OSWD respectfully requests that you select a book as soon as possible so print alternative material for students with disability can be prepared in a timely manner. At least three months prior to the start of the semester is recommended.

4.4.6. A student in my class has missed most of the classes. Should the student still be getting notes?

Students with disabilities must attend classes in order to receive assistance from Note Taking Services. Their accommodation does not excuse their absences.

4.4.7. Must I lower the standards of a required assignment or exam because a student has a disability?

No, academic accommodations actually allow students with disabilities the same opportunities to study as their peers. Students with disabilities are expected to meet all course requirements.

4.4.8. A student has asked to take an exam at OSWD. Will the student be tested without unfair advantage?

OSWD has systematic and secure procedures for getting exams from faculty and returning them once the student has taken the exam, so that no one is able to take an accommodated exam without authorization. Students are proctored while taking exams.

4.4.9. A student using Note-Taking Services approached me with concerns about the quality of the notes received. What should we do?

The student must retrieve course notes by coming to the OSWD and collecting them from his or her personal folder, labeled with Student Identification number. Notes typically are placed in the folder within 24 hours after the end of the class. If there is any dissatisfaction with the quality of service, professionalism, and competence of the Note Taker, or an absence of notes in the folder, the student should contact the Note Taking Services Coordinator.

4.4.10. A student has given me an accommodation letter. How do I make sure the student's needs are being met?

We encourage students and faculty to meet at the beginning of the semester. The purpose of this meeting is to allow the student to make the faculty aware of disabilities and accommodations that may be approved. It also allows the professor to have questions answered by the student.

If the student either hands you the letter or leaves it for you, then we suggest that you reach out to the student and suggest a time for the

two of you to meet. Creating an opportunity for both of you to discuss the situation, ask questions, and solve problems will be a benefit in the end.

4.4.11. OSWD has given me a Faculty Accommodations Letter several weeks after the semester began, and the student now wants to retake an exam. Must I allow it?

No. Faculty are not required to provide reasonable accommodations until OSWD has presented a Faculty Accommodations Letter.

5. Appendix: The Law

5.1. OSWD and Compliance by Gallaudet

There are three legal mandates, discussed below, that protect students with disabilities from discrimination and guarantee the student equal access to all aspects of University life. These are Section 504 of the *Rehabilitation Act of 1973* (PL 93-112), the *Americans with Disabilities Act of 1990*, known as ADA (PL 1001-336), and the *Americans with Disabilities Act Amendments of 2008* (PL 110-325).

In response to these laws, OSWD is dedicated to providing an array of services for students with disabilities, as well as assisting faculty and staff in implementing disability accommodations in the classroom and throughout campus. Our goal is to provide all appropriate accommodation to guarantee equal access.

Faculty are required by law to provide “reasonable accommodations” for students with disabilities that lead to equal access and opportunities on campus.

Students are responsible for disclosing to faculty, and to OSWD, their need for accommodations, and for providing adequate documentation of those needs.

5.2. Section 504 of the *Rehabilitation Act of 1973*

[This section is derived from the pamphlet, “Section 504: The Law and Its Impact on Postsecondary Education”, Association on Higher Education and Disability, Columbus, Ohio; 2011.]

5.2.1. What is the law?

Section 504 of the Rehabilitation Act of 1973 states that:

“No otherwise qualified individual with a disability in the United States ... shall, solely by reason of ... disability, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

5.2.2. Who is Protected Under the Law?

A “person with a disability” includes “any person who (i) has a physical or mental impairment which substantially limits one or more of such person's major life activities; (ii) has a record of such an impairment, or (iii) is regarded as having such an impairment.”

A “qualified person with a disability” is defined as one who meets the requisite academic and technical standards required for admission or participation in the postsecondary institution's programs and activities. Section 504 protects the civil rights of individuals who are qualified to participate and who have disabilities such as, but not limited to, the following:

- Blind or low vision
- Chronic illnesses, such as
 - AIDS
 - arthritis
 - cancer
 - cardiac diseases
 - diabetes
- Psychiatric disabilities
- Deafness or hearing impairments
- Drug or alcohol addiction (Section 504 covers former users and those in recovery programs and not currently using drugs or alcohol.)
- Epilepsy or seizure disorders

- Mental retardation
- Orthopedic impairment
- Specific learning disability
- Speech disorder
- Spinal cord or traumatic brain injury
- Neurological and neuro-muscular disorders

5.2.3. What is the Impact of the Law on Postsecondary Education?

Colleges and universities receiving federal financial assistance must not discriminate in the recruitment, admission, or treatment of students. Students with documented disabilities may request modifications, accommodations, or auxiliary aids which will enable them to participate in and benefit from all postsecondary educational programs and activities. Postsecondary institutions must make such changes to ensure that the academic program is accessible to the greatest extent possible by all students with disabilities.

Under the provisions of Section 504, universities and colleges may *not*:

- limit the number of students with disabilities admitted;
- make preadmission inquiries as to whether an applicant is disabled;
- use admissions tests or criteria that inadequately measure the academic qualifications of disabled students because appropriate modifications were not made for them;
- exclude a qualified student with a disability from any course of study;
- limit eligibility of a student with a disability for financial assistance or otherwise discriminate in administering scholarships, fellowships, internships, or assistantships on the basis of disability;
- counsel a student with a disability toward a more restrictive career;
- measure student achievement using modes that adversely discriminate against a student with a disability; or
- establish policies, practices, or procedures that may adversely affect students with disabilities.

5.2.4. What Can Colleges and Universities Do to Implement Program Modifications?

For college students with disabilities, academic adjustments may include adaptations in the way specific courses are conducted, the use of auxiliary equipment and support staff, and modifications in academic requirements. A college or university has the flexibility to select the specific aid or service it provides, as long as it is effective. Such aids or services should be selected in consultation with the student who will use them.

Modifications may include:

- removing architectural barriers;
- providing services such as readers for deaf-blind or learning disabled individuals, qualified interpreters and notetakers for deaf and hard of hearing students, or notetakers for students with learning disabilities or mobility challenges. (Colleges and universities may, but need not, provide aids, devices, or services of a personal nature, such as personal assistants, wheelchairs, or specially certified tutors.);
- providing modifications, substitutions, or waivers of courses, major fields of study, or degree requirements on a case-by-case basis (Such accommodations need not be made if the institution can demonstrate that the changes requested would substantially alter essential elements of the course or program.);
- allowing extra time to complete exams;
- permitting examinations to be individually proctored, read orally, dictated, or typed;
- increasing the frequency of tests or examinations;
- changing test formats (e.g., from multiple choice to essay);
- using alternative forms for students to demonstrate course mastery (e.g., a narrative tape instead of a written journal); and
- permitting the use of computer software programs or other assistive technological devices to assist in test-taking and study skills.

5.3. The Americans with Disabilities Act of 1990 (ADA)

[This section is derived from the pamphlet, “The Americans with Disabilities Act: The Law and its Impact on Postsecondary Education”, Association on Higher Education and Disability, Columbus, Ohio; 2010.]

5.3.1. What is the law?

The Americans with Disabilities Act of 1990 as amended (ADA) is the civil rights guarantee for persons with disabilities in the United States. It provides protection from discrimination for individuals on the basis of disability. The ADA extends civil rights protections for people with disabilities to employment in the public and private sectors, transportation, public accommodations, services provided by state and local government, and telecommunication relay services.

5.3.2. What is the ADA's definition of a “person with a disability”?

A “person with a disability” is anyone with a physical or mental impairment that substantially limits one or more major life activities, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, working, and the operation of major bodily functions. In addition to those people who have visible disabilities—persons who are blind, deaf, or use a wheelchair—the definition includes people with a range of invisible disabilities. These include psychiatric or learning disabilities, chronic health impairments such as epilepsy, diabetes, arthritis, cancer, cardiac problems, HIV/AIDS, and more. (Documentation of the disability may be required.) A person is considered to be a person with disability if that individual has a disability, has a record of a disability, or is regarded as having a disability.

5.3.3. How does the ADA affect institutions of higher education?

The ADA upholds and extends the standards for compliance set forth in Section 504 of the Rehabilitation Act of 1973 to employment practices, communications, and all policies, procedures, and practices that affect the treatment of students with disabilities. Employment issues for all institutions are covered under Title I. For all activities, public institutions are covered under Title II; private institutions are covered under Title III.

Public and private institutions and programs of postsecondary and higher education are obligated to comply with the ADA in their programs, services, facilities, employment, and other related aspects.

5.3.4. Employment issues under the ADA

University and college personnel will be asked to make “reasonable accommodations” within the employment process to insure nondiscrimination on the basis of disability. Institutions should be prepared to accommodate persons with disabilities qualified to work in campus offices and departments in all aspects of employment including recruitment, application, hiring, benefits, promotion, evaluation, and termination.

This includes:

- active recruitment of qualified persons with disabilities for open positions;
- changes in qualifying examinations and interviewing questions;
- changes to training materials, and training policies; and
- provision of qualified readers or interpreters, as well as technology that will allow employees with disabilities to be fully functional within the employment setting.

5.3.5. Assessing ADA compliance

Public institutions of higher education are responsible for having a clearly established grievance procedure for persons with disabilities who feel their rights have been violated under the ADA. Moreover, each institution is responsible for conducting a self-evaluation of its preparedness, as well as ongoing review of possible barriers in the following areas:

- There may be no exclusion on the basis of disability.
- There may be no discrimination through contract.
- Participation should be in the most integrated setting possible.
- There may be no discrimination through eligibility criteria.
- Reasonable modification in policies, practices, and procedures must be made as necessary to avoid discrimination on the basis of disability.

- Modifications must be made to allow the presence and use of service animals.
- There may be no discrimination through association with a person with a disability.
- Surcharges to cover the costs of accommodations may not be imposed solely on persons with disabilities.
- Examinations and courses must be accessible.
- There may be no discrimination because of insurance constraints.
- There may be no harassment or retaliation against individuals who are accessing their rights under the law or against those who assist people with disabilities in accessing their rights.

Of particular importance in making appropriate accommodations for students with disabilities are the mandates for making modifications as needed in policies, practices, and procedures and for assuring accessibility of examinations and courses. As required under Section 504, this includes all aspects of academic and nonacademic activities including admissions and recruitment, admission to programs, academic adjustments, housing, financial assistance, physical education and athletics, and counseling.

5.4. *The American with Disabilities Act Amendments of 2008*

More recent federal legislation, the *American with Disabilities Act Amendments of 2008* (ADAA) was a response to interpretations of the original test of the ADA. The ADAA clarified those views of the original legislation where they might be seen as limiting the rights of persons with disabilities. The ADAA:

- makes changes to the definition of the term “disability,” clarifying and broadening that definition;
- clarifies that an impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active;
- changes the definition of “regarded as” so that it no longer requires evidence that the employer perceives the individual to be substantially limited in a major life activity, and instead states that an applicant or employee is to be “regarded as” disabled if the individual is subject to an action prohibited by

the ADA based on an impairment that is not transitory and minor; and

- provides that individuals covered only under the “regarded as” provision are not entitled to reasonable accommodation.

Moreover, the ADAA authorizes the right by a single individual to bring suit for discrimination based on disability against not only the University as a public entity, but also against the individual(s) responsible for the act of discrimination. In the classroom, the law requires that a faculty member adapt the course presentation to meet the unique needs of the student's disabling condition. The law also charges students with the responsibility to make their abilities and limitations known, and to meet, **with or without accommodations**, the faculty's expectation in class participation, performance, and work standards. The *Americans with Disabilities Act* and Section 504 are not designed to ensure equal result, but rather to ensure equal opportunities of access.

The *American with Disabilities Act Amendments of 2008* was signed into law on September 25, 2008, taking effect on January 1, 2009.

6. Appendix: Transition of Students with Disabilities to Postsecondary Education: A Guide for High School Educators

[This appendix reprints, in its entirety, the pamphlet “Transition of Students With Disabilities to Postsecondary Education: A Guide for High School Educators”, U.S. Department of Education, Office for Civil Rights, Washington, D.C., 2011. OSWD provides this information to the Gallaudet Community to help prospective students make a smooth transition from high school to college, and to provide awareness for the community they are joining.]

6.1. Introduction

Do you know what is in store for students with disabilities who graduate from your school and head off to postsecondary education? Do you have the information you need to advise them on what to expect in postsecondary education?

For students with disabilities, a big factor in their successful transition from high school to postsecondary education is accurate knowledge about their civil rights. The purpose of this guide is to provide high school educators with answers to questions students with disabilities may have as they get ready to move to the postsecondary education environment.

This guide was developed by the U.S. Department of Education's Office for Civil Rights (OCR). OCR has enforcement responsibilities under *Section 504 of the Rehabilitation Act of 1973* (Section 504), as amended, and Title II of the *Americans with Disabilities Act of 1990*, as amended, (Title II), which prohibit discrimination on the basis of disability. Every school district and nearly every college and university in the United States is subject to one or both of these laws, which have similar requirements.¹ Private postsecondary institutions that do not receive federal financial assistance are not subject to Section 504 or Title II. They are, however, subject to Title III of the *Americans with Disabilities Act*, which is enforced by the U.S. Department of Justice and which prohibits discrimination on the basis of disability by private entities that are not private clubs or religious entities.

This guide also makes reference to Part B of the *Individuals with Disabilities Education Act (IDEA)*, which provides funds to states to assist in making a free appropriate public education (FAPE) available to eligible children with disabilities. *IDEA* requirements apply to state education agencies, school districts and other public agencies that serve *IDEA*-eligible children. Institutions of postsecondary education have no legal obligations under the *IDEA*.²

Similarly, this guide references the state Vocational Rehabilitation (VR) Services Program, authorized by the *Rehabilitation Act*, which provides funds to state VR agencies to assist eligible individuals with disabilities in obtaining employment. State VR agencies provide a wide range of employment-related services, including services designed to facilitate the transition of eligible students with disabilities from school to post-school activities.³

In preparing this guide, we have highlighted the significant differences between the rights and responsibilities of students with disabilities in the high school setting and the rights and responsibilities these students will have once they are in the postsecondary education setting. Following a set of frequently asked questions, we have provided some practical suggestions that high school educators can

share with students to facilitate their successful transition to postsecondary education.

6.2. Frequently Asked Questions

The Admissions Process

1. Are students with disabilities entitled to changes in standardized testing conditions on entrance exams for institutions of postsecondary education?

It depends. In general, tests may not be selected or administered in a way that tests the disability rather than the achievement or aptitude of the individual.⁴ In addition, federal law requires changes to the testing conditions that are necessary to allow a student with a disability to participate as long as the changes do not fundamentally alter the examination or create undue financial or administrative burdens.⁵ Although some institutions of postsecondary education may have their own entrance exams, many use a student's score on commercially available tests. In general, in order to request one or more changes in standardized testing conditions, which test administrators may also refer to as "testing accommodations"⁶, the student will need to contact the institution of postsecondary education or the entity that administers the exam and provide documentation of a disability and the need for a change in testing conditions. The issue of documentation is discussed below. Examples of changes in testing conditions that may be available include, but are not limited to:

- Braille;
- Large print;
- Fewer items on each page;
- Tape recorded responses;
- Responses on the test booklet;
- Frequent breaks;
- Extended testing time;
- Testing over several sessions;
- Small group setting;
- Private room;
- Preferential seating; and
- The use of a sign language interpreter for spoken directions.

2. Are institutions of postsecondary education permitted to ask an applicant if he or she has a disability before an admission decision is made?

Generally, institutions of postsecondary education are not permitted to make what is known as a “preadmission inquiry” about an applicant’s disability status. Preadmission inquiries are permitted only if the institution of postsecondary education is taking remedial action to correct the effects of past discrimination or taking voluntary action to overcome the effects of conditions that limited the participation of individuals with disabilities.⁷

Examples of impermissible preadmission inquiries include: *Are you in good health? Have you been hospitalized for a medical condition in the past five years?* Institutions of postsecondary education may inquire about an applicant’s ability to meet essential program requirements provided that such inquiries are not designed to reveal disability status. For example, if physical lifting is an essential requirement for a degree program in physical therapy, an acceptable question that could be asked is, *With or without reasonable accommodation, can you lift 25 pounds?* After admission, in response to a student’s request for “academic adjustments,”⁸ reasonable modifications or auxiliary aids and services, institutions of postsecondary education may ask for documentation regarding disability status.

3. May institutions of postsecondary education deny an applicant admission because he or she has a disability?

No. If an applicant meets the essential requirements for admission, an institution may not deny that applicant admission simply because he or she has a disability, nor may an institution categorically exclude an applicant with a particular disability as not being qualified for its program.⁹ For instance, an institution may not automatically assume that all applicants with hearing or visual impairments would be unable to meet the essential eligibility requirements of its music program. An institution may, however, require an applicant to meet any essential technical or academic standards for admission to, or participation in, the institution and its program.¹⁰ An institution may deny admission to any student, disabled or not, who does not meet essential requirements for admission or participation.

4. Are institutions obligated to identify students with disabilities?

No. Institutions do not have a duty to identify students with disabilities. Students in institutions of postsecondary education are responsible for notifying institution staff of their disability should they need academic adjustments. High schools, in contrast, have an obligation to identify students within their jurisdiction who have a disability and who may be entitled to services.

5. Are students obligated to inform institutions that they have a disability?

No. A student has no obligation to inform an institution of postsecondary education that he or she has a disability; however, if the student wants an institution to provide an academic adjustment or assign the student to accessible housing or other facilities, or if a student wants other disability-related services, the student must identify himself or herself as having a disability. The disclosure of a disability is always voluntary. For example, a student who has a disability that does not require services may choose not to disclose his or her disability

Post-Admission: Documentation of a Disability

6. What are academic adjustments and auxiliary aids and services?

Academic adjustments are defined in the Section 504 regulations at 34 C.F.R. § 104.44(a) as:

[S]uch modifications to [the] academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating, on the basis of [disability] against a qualified ... applicant or student [with a disability]. Academic requirements that the recipient can demonstrate are essential to the instruction being pursued by such student or to any directly related licensing requirement will not be regarded as discriminatory within the meaning of this section. Modifications may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted.¹¹

Academic adjustments also may include a reduced course load, extended time on tests and the provision of auxiliary aids and services. Auxiliary aids and services are defined in the Section 504 regulations

at 34 C.F.R. § 104.44(d), and in the Title II regulations at 28 C.F.R. § 35.104. They include note-takers, readers, recording devices, sign language interpreters, screen-readers, voice recognition and other adaptive software or hardware for computers, and other devices designed to ensure the participation of students with impaired sensory, manual or speaking skills in an institution's programs and activities. Institutions are not required to provide personal devices and services such as attendants, individually prescribed devices, such as eyeglasses, readers for personal use or study, or other services of a personal nature, such as tutoring. If institutions offer tutoring to the general student population, however, they must ensure that tutoring services also are available to students with disabilities. In some instances, a state VR agency may provide auxiliary aids and services to support an individual's postsecondary education and training once that individual has been determined eligible to receive services under the VR program.

7. In general, what kind of documentation is necessary for students with disabilities to receive academic adjustments from institutions of postsecondary education?

Institutions may set their own requirements for documentation so long as they are reasonable and comply with Section 504 and Title II. It is not uncommon for documentation standards to vary from institution to institution; thus, students with disabilities should research documentation standards at those institutions that interest them. A student must provide documentation, upon request, that he or she has a disability, that is, an impairment that substantially limits a major life activity¹² and that supports the need for an academic adjustment. The documentation should identify how a student's ability to function is limited as a result of her or his disability. The primary purpose of the documentation is to establish a disability in order to help the institution work interactively with the student to identify appropriate services. The focus should be on whether the information adequately documents the existence of a current disability and need for an academic adjustment.

8. Who is responsible for obtaining necessary testing to document the existence of a disability?

The student. Institutions of postsecondary education are not required to conduct or pay for an evaluation to document a student's disability and need for an academic adjustment, although some institutions do

so. If a student with a disability is eligible for services through the state VR Services program, he or she may qualify for an evaluation at no cost. High school educators can assist students with disabilities in locating their state VR agency at <<http://rsa.ed.gov>> (click on “Info about RSA,” then “Resources,” then “State and Local Government Employment Resources,” then “Vocational Rehabilitation Offices”). If students with disabilities are unable to find other funding sources to pay for necessary evaluation or testing for postsecondary education, they are responsible for paying for it themselves.

At the elementary and secondary school levels, a school district’s duty to provide a free appropriate public education (FAPE) encompasses the responsibility to provide, at no cost to the parents, an evaluation of suspected areas of disability for any of the district’s students who is believed to be in need of special education or related aids and services. School districts are not required under Section 504 or Title II to conduct evaluations that are for the purpose of obtaining academic adjustments once a student graduates and goes on to postsecondary education.

9. Is a student’s most recent individualized education program (IEP) or Section 504 plan sufficient documentation to support the existence of a disability and the need for an academic adjustment in a postsecondary setting?

Generally, no. Although an IEP or Section 504 plan may help identify services that have been used by the student in the past, they generally are not sufficient documentation to support the existence of a current disability and need for an academic adjustment from an institution of postsecondary education. Assessment information and other material used to develop an IEP or Section 504 plan may be helpful to document a current disability or the need for an academic adjustment or auxiliary aids and services. In addition, a student receiving services under Part B of the *IDEA* must be provided with a summary of his or her academic achievements and functional performance that includes recommendations on how to assist in meeting the student’s postsecondary goals.¹³ This information may provide helpful information about disability and the need for an academic adjustment.

10. What can high school personnel, such as school psychologists and counselors, transition specialists, special education staff and others,

do to assist students with disabilities with documentation requirements?

By the time most students with disabilities are accepted into a postsecondary institution, they are likely to have a transition plan and-or to be receiving transition services, which may include evaluations and services provided by the state VR agency. High school personnel can help a student with disabilities to identify and address the specific documentation requirements of the postsecondary institution that the student will be attending. This may include assisting the student to identify existing documentation in her or his education records that would satisfy the institution's criteria, such as evaluation reports and the summary of the student's academic achievement and functional performance. School personnel should be aware that institutions of postsecondary education typically do not accept brief conclusory statements for which no supporting evidence is offered as sufficient documentation of a disability and the need for an academic adjustment. School personnel should also be aware that some colleges may delay or deny services if the diagnosis or the documentation is unclear.

11. Will a medical diagnosis from a treating physician help to document disability?

A diagnosis of impairment alone does not establish that an individual has a disability within the meaning of Section 504 or Title II. Rather, the impairment must substantially limit a major life activity, or the individual must have a record of such an impairment or be regarded as having such an impairment.¹⁴ A diagnosis from a treating physician, along with information about how the disability affects the student, may suffice. As noted above, institutions of postsecondary education may set their own requirements for documentation so long as they are reasonable and comply with Section 504 and Title II.

12. If it is clear that a student has a disability, why does an institution need documentation?

Students who have the same disability may not necessarily require the same academic adjustment. Section 504 and Title II require that institutions of postsecondary education make individualized determinations regarding appropriate academic adjustments for each individual student. If the student's disability and need for an academic adjustment are obvious, less documentation may be necessary.

13. *If an institution thinks that the documentation is insufficient, how will the student know?*

If the documentation a student submitted for the institution's consideration does not meet the institution's requirements, an official should notify the student in a timely manner of what additional documentation the student needs to provide. As noted above, a student may need a new evaluation in order to provide documentation of a current disability.

Post-Admission: Obtaining Services

14. *Must institutions provide every academic adjustment a student with a disability wants?*

It depends. Institutions are not required to provide an academic adjustment that would alter or waive essential academic requirements.¹⁵ They also do not have to provide an academic adjustment that would fundamentally alter the nature of a service, program or activity or result in undue financial or administrative burdens considering the institution's resources as a whole.¹⁶ For example, an appropriate academic adjustment may be to extend the time a student with a disability is allotted to take tests, but an institution is not required to change the substantive content of the tests. In addition, an institution is not required to make modifications that would result in undue financial or administrative burdens. Public institutions are required to give primary consideration to the auxiliary aid or service that the student requests, but can opt to provide alternative aids or services if they are effective. They can also opt to provide an effective alternative if the requested auxiliary aid or service would fundamentally alter the nature of a service, program or activity or result in undue financial or administrative burdens. For example, if it would be a fundamental alteration or undue burden to provide a student with a disability with a note-taker for oral classroom presentations and discussions and a tape recorder would be an effective alternative, a postsecondary institution may provide the student with a tape recorder instead of a note-taker.

15. *If students want to request academic adjustments, what must they do?*

Institutions may establish reasonable procedures for requesting academic adjustments; students are responsible for knowing these

procedures and following them. Institutions usually include information on the procedures and contacts for requesting an academic adjustment in their general information publications and Web sites. If students are unable to locate the procedures, they should contact an institution official, such as an admissions officer or counselor.

16. What should students expect in working with a disability coordinator at an institution of postsecondary education?

A high school counselor, a special education teacher or a VR counselor may meet with high school students with disabilities to provide services or monitor their progress under their education plans on a periodic basis. The role of the disability coordinator at an institution of postsecondary education is very different. At many institutions, there may be only one or two staff members to address the needs of all students with disabilities attending the institution. The disability coordinator evaluates documentation, works with students to determine appropriate services, assists students in arranging services or testing modifications, and deals with problems as they arise. A disability coordinator may have contact with a student with a disability only two or three times a semester. Disability coordinators usually will not directly provide educational services, tutoring or counseling, or help students plan or manage their time or schedules. Students with disabilities are, in general, expected to be responsible for their own academic programs and progress in the same ways that nondisabled students are responsible for them.

17. When should students notify the institution of their intention to request an academic adjustment?

As soon as possible. Although students may request academic adjustments at any time, students needing services should be advised to notify the institution as early as possible to ensure that the institution has enough time to review their request and provide an appropriate academic adjustment. Some academic adjustments, such as interpreters, may take time to arrange. In addition, students should not wait until after completing a course or activity or receiving a poor grade to request services and then expect the grade to be changed or to be able to retake the course.

18. How do institutions determine what academic adjustments are appropriate?

Once a student has identified him- or herself as an individual with a disability, requested an academic adjustment and provided appropriate documentation upon request, institution staff should discuss with the student what academic adjustments are appropriate in light of the student's individual needs and the nature of the institution's program. Students with disabilities possess unique knowledge of their individual disabilities and should be prepared to discuss the functional challenges they face and, if applicable, what has or has not worked for them in the past. Institution staff should be prepared to describe the barriers students may face in individual classes that may affect their full participation, as well as to discuss academic adjustments that might enable students to overcome those barriers.

19. Who pays for auxiliary aids and services?

Once the needed auxiliary aids and services have been identified, institutions may not require students with disabilities to pay part or all of the costs of such aids and services, nor may institutions charge students with disabilities more for participating in programs or activities than they charge students who do not have disabilities. Institutions generally may not condition their provision of academic adjustments on the availability of funds, refuse to spend more than a certain amount to provide academic adjustments, or refuse to provide academic adjustments because they believe other providers of such services exist.¹⁷ In many cases, institutions may meet their obligation to provide auxiliary aids and services by assisting students in either obtaining them or obtaining reimbursement for their cost from an outside agency or organization, such as a state VR agency. Such assistance notwithstanding, institutions retain ultimate responsibility for providing necessary auxiliary aids and services and for any costs associated with providing such aids and services or utilizing outside sources. However, as noted above, if the institution can demonstrate that providing a specific auxiliary aid or service would result in undue financial or administrative burdens, considering the institution's resources as a whole, it can opt to provide another effective one.

20. What if the academic adjustments the institution provides are not working?

If the academic adjustments provided are not meeting the student's needs, it is the student's responsibility to notify the institution as soon as possible. It may be too late to correct the problem if the student

waits until the course or activity is completed. The student and the institution should work together to resolve the problem.

6.3. Keys to Success: Attitude, Self-Advocacy And Preparation

The attitude and self-advocacy skills of students with disabilities may be two of the most important factors in determining their success or failure in postsecondary education. Students with disabilities need to be prepared to work collaboratively with the institution's disability coordinator to enable them to have an equal opportunity to participate in an institution's programs and activities. To ensure that students with disabilities possess the desired levels of self-advocacy to succeed in postsecondary education, high school educators may want to encourage the students to:

Understand their disabilities. Students with disabilities need to know the functional limitations that result from their disabilities and understand their strengths and weaknesses. They should be able to explain their disabilities to an institution's disability coordinators or other appropriate staff. As part of this process, students should be able to explain where they have had difficulty in the past, as well as what has helped them overcome such problems and what specific adjustments might work in specific situations. To assist students in this area, high school educators can encourage high school students to be active participants in their IEP or Section 504 meetings. High school personnel also can suggest that students practice explaining their disabilities, as well as why they need certain services, to appropriate secondary staff or through role-playing exercises to prepare them to engage in such conversations with confidence in a postsecondary setting.

Accept responsibility for their own success. All students, including those with disabilities, must take primary responsibility for their success or failure in postsecondary education. Students with disabilities, in particular, are moving from a system where parents and school staff usually advocated on their behalf to a system where they will be expected to advocate for themselves. An institution's staff will likely communicate directly with students when issues arise and are generally not required to interact with students' parents. In general, students with disabilities should expect to complete all course requirements, such as assignments and examinations. Students with

disabilities need to identify the essential academic and technical standards that they will be required to meet for admission and continued participation in an institution's program. Students also need to identify any academic adjustments they may need as a result of their disabilities to meet those standards and how to request those adjustments. Students with disabilities need to understand that, while federal disability laws guarantee them an equal opportunity to participate these laws do not guarantee that students will achieve a particular outcome, for example, good grades.

Take an appropriate preparatory curriculum. Because all students will be expected to meet an institution's essential standards, students with disabilities need to take a high school curriculum that will prepare them to meet those standards. If students with disabilities plan to attend a rigorous postsecondary institution, they, like their peers without disabilities, need to make high school curriculum choices that support that goal. High school guidance counselors and state VR agency counselors, in particular, can play an important role in students' curriculum planning.

For all students, good study skills and the ability to write well are critical factors of success in postsecondary education. High school educators can help students in these areas by offering or identifying opportunities, such as workshops, courses or tutoring programs, that emphasize the importance of reading, writing and good study skills. In addition, staff should encourage students to enroll in classes that will focus on writing and study skills in their freshman year of postsecondary education.

Learn time management skills. Although a primary role of high school educators is to provide monitoring, direction and guidance to students as they approach the end of their high school career, staff also need to prepare students to act independently and to manage their own time with little to no supervision. High school educators can assist students by identifying resources that will help them learn time management and scheduling skills.

Acquire computer skills. Because postsecondary students use computers to complete a multitude of tasks, from registering for classes to accessing course material and obtaining grades, it is essential that students learn to use computers if they are to be prepared for postsecondary education. Ideally, students with disabilities need to start using computers as early as possible in school

to increase their familiarity with, and their comfort level in using, computers. Students with visual impairments, hearing impairments, learning disabilities or mobility impairments may have problems with inputting data or reading a computer monitor. Assistive technology can help certain students with disabilities use computers and access information.

Consider supplemental postsecondary education

preparatory programs. A variety of institutions of postsecondary education have summer programs in which students can participate while they are still in high school, or after graduation, to ease their transition to postsecondary education. These programs often expose students to experiences that they are likely to encounter in postsecondary education, such as living in dorms, relating to other students and eating in dining halls. The programs may also focus on instruction in certain subject areas, such as math or English, or in certain skills, such as computer, writing or study skills, that can prepare a student to be successful in postsecondary education. High school educators can assist students with disabilities by identifying such program opportunities in their area of residence.

Research postsecondary education programs. Students with disabilities may select any program for which they are qualified but should be advised to review carefully documentation standards and program requirements for their program or institution of interest. For example, students should pay close attention to an institution's program requirements, such as language or math, to avoid making a large financial and time commitment only to realize several years into a program that they cannot, even with academic adjustments, meet an essential requirement for program completion. Campus visits, which include visits to the disability services office, can be helpful in locating an environment that best meets a student's interests and needs. In addition, while all institutions have a legal obligation to provide appropriate services, certain colleges may be able to provide better services than others due to their size or location.

Get involved on campus. To help students avoid the isolation that can occur away from home during the first year of postsecondary education, high school educators should encourage students to live on campus and to become involved in campus activities. Attendance at orientation programs for freshmen is a good first step in discovering ways to get involved in the postsecondary education environment.

6.4. Publication Information

If you would like more information about the responsibilities of postsecondary schools to students with disabilities, read the OCR brochures *Auxiliary Aids and Services for Postsecondary Students with Disabilities: Higher Education's Obligations Under Section 504 and Title II of the ADA* and *Students with Disabilities Preparing for Postsecondary Education: Know Your Rights and Responsibilities*. You may obtain copies of these brochures by contacting us at the address and phone numbers below or on the Department's website at: <<http://www.ed.gov/ocr/publications.html#Section504>>. To receive more information about the civil rights of students with disabilities in education institutions, please contact OCR at:

Customer Service Team

Office for Civil Rights
U.S. Department of Education
Washington, DC 20202-1100

Phone: 1-800-421-3481

TTY: 1-877-521-2172

E-mail: <ocr@ed.gov>

Web address: <<http://www.ed.gov/ocr>>

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6.5. Endnotes

¹ The *Americans with Disabilities Act Amendments Act (Amendments Act)*, P.L. 110-325, amended the *ADA* and Section 7 of the *Rehabilitation Act of 1973*, which contains the disability definition for Section 504. The *Amendments Act* became effective on January 1, 2009. The *Amendments Act* affected the meaning of the term "disability" in the *ADA* and Section 504, most notably by requiring that "disability" under these statutes be interpreted broadly. More information about the *Amendments Act* is available from OCR's website at <<http://www.ed.gov/policy/rights/guid/ocr/disability.html>> and <<http://www.ed.gov/about/offices/list/ocr/504faq.html>>.

² The U.S. Department of Education's Office of Special Education Programs (OSEP) administers the *IDEA*. You can find additional information about the *IDEA* at <<http://www.ed.gov/about/offices/list/osers/osep>>, or by contacting OSEP at:

Office of Special Education Programs
Office of Special Education and Rehabilitative Services
U.S. Department of Education
400 Maryland Ave. S.W.
Washington, DC 20202-7100
Telephone: 202-245-7459

³ OSERS' Rehabilitation Services Administration (RSA) administers a formula grant program that funds state VR agencies to provide eligible

individuals with disabilities with employment-related services, including services to facilitate transition. Additional information about this grant program is available at <http://www2.ed.gov/about/offices/list/osers/rsa/index.html> or by contacting RSA at:

Rehabilitation Services Administration
U.S. Department of Education
400 Maryland Ave. S.W.
Washington, DC 20202-2800
Telephone: 202-245-7488

⁴ See 34 C.F.R. § 104.42(b) (2010); and 28 C.F.R. § 35.130(b)(8) (2010).

⁵ See 28 C.F.R. § 35.130(b)(7) and 28 C.F.R. § 35.164.

⁶ The term “accommodations” is also referenced under the *IDEA* and used by the major publishers of college entrance exams. The term generally refers to changes in the standardized testing conditions provided to a student with disabilities that will not impact the validity of the student’s test scores.

⁷ See 34 C.F.R. § 104.42(b)-(c).

⁸ In this document, consistent with the Section 504 regulations at 34 C.F.R. § 104.44, we generally use the term “academic adjustments” to refer to modifications to nonessential academic requirements, reasonable changes to policies, procedures and practices, and the provision of auxiliary aids and services necessary for individuals with disabilities to participate in, and benefit from, the postsecondary education program. These terms are further explained in the section of this guide titled “Post-Admission: Documentation of a Disability.” It should be noted that the term “reasonable accommodations,” commonly used in the employment context, also may be familiar to postsecondary school personnel.

⁹ See 34 C.F.R. §§ 104.4 and 104.42; and 28 C.F.R. § 35.130.

¹⁰ See 34 C.F.R. § 104.3(l)(3); and 28 C.F.R. § 35.104.

¹¹ Although the term “handicap” is used in the Section 504 regulation, consistent with contemporary usage, this guidance uses the term “disability.”

¹² Regulations implementing Section 504 and Title II of the ADA contain non-exhaustive lists of major life activities. See 34 C.F.R. § 104.3(j)(2)(ii) (2010) and 28 C.F.R. § 35.104 (2009). The *Amendments Act* included additional examples of general activities and “major bodily functions” that are major life activities. See 42 U.S.C. § 12102(2).

¹³ See 34 C.F.R. § 300.305(e)(3) (2010).

¹⁴ See 34 C.F.R. § 104.3; and 28 C.F.R. § 35.104.

¹⁵ See 34 C.F.R. § 104.44(a).

¹⁶ See 28 C.F.R. § 35.164.

¹⁷ See 34 C.F.R. § 104.4; and 28 C.F.R. § 35.130.