

What is a Disability?

Under both the Americans With Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, a “person with a disability” is someone with a physical, mental, or learning impairment that substantially limits one or more major life activities. Students requesting accommodations based on a disability must provide recent documentation from an appropriate professional. If the documentation indicates that the disability substantially limits some major life activity, it establishes that this is a person with a disability. It does not establish that the individual has a need for, or a right to, accommodation. Students with disabilities will receive accommodations appropriate to their needs to enable them to fully participate in or benefit from the college’s programs, services and activities in a non-discriminatory, integrated manner. Having an accommodation plan in place is not a guarantee of academic success; that is the responsibility of the student.

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Determining Eligibility for Services

Students and Learning Support Services (LSS) staff complete an intake process in which the student's expressed needs and the disability documentation is reviewed. Eligibility for services is based on a combination of the student's description of need, the thoroughness of the disability documentation, and documentation guidelines developed by LSS staff. At the conclusion of the intake a documented accommodations plan is completed for each student and training in use of the accommodations or services is provided. An IEP is helpful but NOT sufficient documentation.

Providing documentation of disability is the responsibility of the student. In general, the less obvious the disability, the more information is required to assess a student's needs and make accommodation recommendations. Documentation should be recent, relevant and comprehensive, and, where appropriate, contain test scores and interpretation (e.g., learning disability reports, audiograms, etc.) If the original documentation is incomplete or inadequate to determine the extent of the disability or reasonable accommodation, the college has the discretion to require additional documentation. Any cost incurred in obtaining additional documentation is also borne by the student.

Note: Pending the receipt of appropriate documentation, the college reserves the right to deny services or accommodations.

Developing a Documented Accommodations Plan

During the intake process documentation is reviewed, accommodations are identified and recorded on a Documented Accommodation Plan (DA). The DA becomes the record of the accommodations recommended by the LSS staff and can be used to communicate with faculty and staff regarding accommodation requests. Upon completion of the intake process, students receive training in the appropriate services. Although the intake process is designed to identify all relevant accommodations, the plan may be revised during the course of a student's enrollment due to changes in disability status, disability documentation, or program standards and requirements.

Some accommodations and services must be requested each semester. For example, notetakers and audiotaped textbooks all require students to communicate their service needs to LSS staff prior to the beginning of each semester. Adhering to deadlines for service requests enables the college and the LSS staff to allocate resources and provide necessary services in a timely manner.

There is no fee assessed to disabled students for recommended accommodations, academic adjustments and/or auxiliary aids. Some students receive funding through the state Department of Vocational Rehabilitation (DVR) office.

Determining Reasonable Accommodations

A reasonable accommodation is a modification or adjustment to a course, program, service, activity, or facility that enables a qualified student with a disability to have an equal opportunity to attain the same level of performance or enjoy equal benefits and privileges as are available to similarly situated students without disabilities. The college is obligated to provide accommodations only for the known limitations of an otherwise qualified disabled student. To determine reasonable accommodations, LSS staff may seek information from appropriate college personnel regarding essential standards for courses, programs, services, activities, and facilities.

Reasonable accommodations are determined by examining:

- the barriers resulting from the interaction between the documented disability and the campus environment.
- the possible accommodations that might remove the barriers.
- whether the student has access to the course, program, service, activity or facility without an accommodation.
- whether essential elements of the course, program, service, activity or facility are compromised by the accommodations.

Accommodation Request Analysis

In reviewing accommodation requests, the following analysis is used:

1. Does the student have a disability?

2. Is the student "otherwise qualified"?
3. Did the student request an accommodation?
4. Was the request submitted in a manner consistent with established college policies and procedures?
5. Is the request reasonable and/or readily achievable?
6. Is the nature of the program or activity fundamentally altered by the provision of the accommodation?
7. Does the provision of the accommodation present an undue financial or administrative burden on the college?

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| <p>How to Become an Edgewood College Disabilities Support Services Client</p> |
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1. Complete the intake form and mail it to Edgewood College Disabilities Support Services
2. Provide disability documentation:
 - Read Documentation Guidelines. Forward the guidelines to the clinician providing your documentation.
 - Have clinician complete Disability Assessment Form and forward it to Edgewood College Disability Support Services.
3. Schedule a first intake appointment:
 - Current or admitted Edgewood College students:

Contact the front desk of the Student Resource Center (SRC) to schedule an appointment with the Disabilities Services Coordinator, 608-663-2281. Make sure that your disability documentation arrives at least a week before this appointment.

Intake appointment may occur over the phone or in person for newly admitted students.
 - Students not yet admitted:

Until you are currently enrolled or admitted to Edgewood College, you do not need to schedule an intake appointment.

Please review the website <https://edgenet.edgewood.edu/> for information related to disability services at Edgewood College and documentation guidelines.

You are welcome to contact the Disabilities Services Coordinator to discuss your needs and general information.
4. Accommodations Plan is developed
 - Each student has an individualized Documented Accommodations Plan (DAP).
5. Attend service training/orientation for services that may require training, such as
 - Alternative Testing
 - Use of note taking services
 - Adaptive/Assistive technology
6. Request services each semester and communicate your accommodations/needs with your faculty.
7. Follow up, as needed.

Rights and Responsibilities

Students with disabilities have the right to:

- full and equal participation in the services and activities of Edgewood College.
- reasonable accommodations, academic adjustments and/or auxiliary aids and services that do not fundamentally alter the nature of a program or curriculum.
- privacy and protection from the dissemination of confidential information; however, even though records are kept strictly confidential, students must recognize that in implementing accommodations, it may become more difficult
- information, readily available in accessible formats.

Students with disabilities have the responsibility to:

- meet qualifications and essential institutional standards for courses, programs, services, jobs, and activities.
- identify as an individual with a disability when an accommodation is needed and to seek information, counsel, and assistance as necessary.
- demonstrate and/or document (from an appropriate professional) how the disability limits their participation in courses, programs, services, jobs, and activities.
- follow published procedures for obtaining reasonable accommodations and/or auxiliary aids and services, or requesting barrier removal.

The College, through faculty and staff, has the right to:

- establish essential functions, abilities, skills, knowledge and standards for courses, programs, services, jobs and activities or facilities and to evaluate students on this basis.
- confirm disability status and request and receive current, relevant documentation that supports requests for accommodations, academic adjustments and/or auxiliary aids and services.
- have appropriate staff discuss students and their disabilities in order to implement requested accommodations (particularly instructional accommodations).
- deny a request for accommodations, academic adjustments, or auxiliary aids and services, and/or barrier removal in facilities if the documentation does not demonstrate that the

request is warranted, or if the individual fails to provide appropriate documentation.

- select among equally effective accommodations, academic adjustments and/or auxiliary aids and services.
- refuse unreasonable accommodations, academic adjustments or auxiliary aids and services, and/or facility-related barrier removal requests that impose a fundamental alteration to a program or activity of the college.

The College has the responsibility to:

- provide information to faculty, staff, students and guests with disabilities in accessible formats upon request.
- ensure that courses, programs, services, jobs, activities and facilities, when viewed in their entirety, are available and usable in the most integrated and appropriate settings.
- evaluate students on the basis of their abilities rather than their disabilities.
- respond to requests on a timely basis.
- provide or arrange reasonable accommodations to students who have provided documentation that supports a need for accommodation.
- maintain appropriate confidentiality of records and communication except where permitted or required by law.

**Differences between Services for Students with Disabilities
High School versus College**

In high school, services for students with disabilities are provided under Section 504 of the Rehabilitation Act of 1973 and IDEA. In college, services are provided under Section 504 and the Americans with Disabilities Act. Some services, policies, and requirements change from high school to college due to the differences in these laws and due to differences in the high school and college environments.

| High School | College |
|---|---|
| Disability Evaluation and Accommodations | |
| School districts are responsible for identifying and evaluating the disability. | Students are responsible for making their disabilities known to the disabilities services provider at the college and must provide current documentation of their disability. Students must pay all costs related to evaluations of the disability. |
| School districts often pay for costs such as personal attendants, tutoring, and personal auxiliary aids such as tape recorders. | Colleges are responsible for costs involved in providing essential accommodations based on documentation of disability but are not responsible for providing services of a personal nature, such as remedial instruction, personal assistants, tutoring, and personal auxiliary aids. |
| Communication and Confidentiality | |
| The special education teacher acts as a liaison for the student, teachers, parents and others. | Professors will not know about the student's disability (if it is a hidden disability) unless the student chooses to disclose information to the professor. |
| Teachers may talk with parents about a student's academic progress. | Neither professors nor the disability services provider can share information with parents without the written permission of the student. |
| Personal Responsibility in the Classroom | |
| In general, students are monitored more closely in high school than they are in college. Students may see special education teachers and other teachers on a daily basis. | Students see professors just one to three times per week. Students may see the disability services provider only when specific services are required. |
| Teachers are often proactive about contacting students or parents if a student appears to have problems of a personal or academic nature. | Students are expected to seek out professors and other college resources on their own. Professors and other personnel will rarely contact students unless they are responding to a direct question. |
| | Professors do not determine appropriate disability services for students; students must request disability services from the designated office at the college. |
| There are often many tests, homework assignments, and other projects throughout the year so students have many opportunities to demonstrate their knowledge of the subject. | Final grades for courses may be based on just two or three exams, projects, and/or written assignments. Students are expected to be self-motivated to study, even when there are no assignments due soon. |

This document is intended as a guide for students with disabilities who are making the transition from high school to college. It is not a legal document. Adapted with permission from *St. Louis Community College at Meramec's ACCESS Office's Student Handbook*. 6/01

Disability Documentation Guidelines For Individuals with Disabilities

Edgewood College Disability Services

Pursuant to the Americans with Disabilities Act (ADA) and Section 504 of the Vocational Rehabilitation Act of 1973, individuals with disabilities are protected from discrimination and assured services and accommodations that provide equal access to the activities and programs of the College. To establish that an individual is covered under the ADA, documentation must be submitted indicating that the disability substantially limits a major life activity. If a student is requesting an academic or classroom-based adjustment, or accommodations are requested, learning or access to learning environments must be one of the major life activities affected. Documentation submitted must

- (i) Be appropriate to verify eligibility
- (ii) Demonstrate a current substantial impact of one or more major life activities, and
- (iii) Support the request for accommodations, academic adjustments, auxiliary aids, or a combination of these.

To qualify for disability services at Edgewood College, a student is required to provide diagnostic documentation from a licensed clinical professional familiar with the history and functional implications of the impairments. Disability documentation must adequately verify the nature and extent of the disability in accordance with current professional standards and techniques, and it must clearly substantiate the need for all of the individual's specific accommodation requests. All documentation must be submitted on the official letterhead of the professional describing the disability. The report should be dated and signed and include the name, title, and professional credentials of the evaluator, including information about the professional's license or certification. If the original documentation is not complete or adequate enough to determine the extent of the disability or reasonable accommodation, Edgewood College has the discretion to require additional documentation. The student bears the cost of obtaining additional documentation. If the documentation is complete but the College desires a second professional opinion, Edgewood College bears the cost of obtaining the second opinion. Testing done by, or documentation submitted by a member of the student's family is unacceptable. Students requesting accommodations on the basis of multiple disabilities must provide evidence of all such conditions.

Students must complete and return an Intake Form with the disability documentation. The form should be completed and included with the other required materials as outlined below.

The following documents were used in the development of these policies and guidelines: *Disability Documentation Policies*, University of Wisconsin-Madison McBurney Disability Resource Center; *Application Procedure*, University of Illinois at Urbana-Champaign Division of Rehabilitation-Education Services; and *Guidelines for Documentation of Psychiatric Disabilities in Adolescents and Adults*, The consortium on ADHD Documentation, Educational Testing Services (ETS).

I. Mobility, Systemic or Health-Related Disabilities

Individuals requesting accommodations based on mobility, systemic, or disease-related disabilities must provide documentation from a specialist in the area of the disability or medical condition consisting of

- a. Identification of the disabling condition(s)
- b. An assessment of the functional limitations of the condition(s) for which accommodations are being requested, and whether the limitation is mild, moderate, or substantial
- c. Suggestions as to how the functionally limiting manifestations of the condition(s) might be appropriately accommodated.

II. Hearing Loss

Deaf or hard of hearing individuals requesting accommodations based on deafness or hearing loss must provide documentation consisting of

- a. An audiological evaluation and/or audiogram, no older than three (3) years if loss is progressive
- b. An assessment of the functional limitations of the hearing loss for which accommodations are being requested, and whether the degree of limitation is mild, moderate, or substantial
- c. Suggestions as to how the functionally limiting manifestations of the hearing loss condition(s) might appropriately be accommodated.

III. Low Vision or Blindness

Individuals requesting accommodations based on low vision or blindness must provide documentation consisting of

- a. An ocular assessment or evaluation from an ophthalmologist
- b. A low-vision evaluation of residual visual function, when appropriate

- c. An assessment of the functional limitations of the condition(s) for which accommodations are being requested, and whether the degree of limitation is mild, moderate, or substantial
- d. Suggestions as to how the functionally limiting manifestations of the visual condition(s) might be appropriately accommodated.

IV. Specific Learning Disability

Individuals requesting accommodations on the basis of a specific learning disability must provide documentation from a professional who has undergone comprehensive training and has relevant experience in differential diagnosis of a full range of cognitive and psychiatric disabilities (for example, licensed clinical psychologist, educational psychologist, or neuropsychologist). An IEP/504 plan alone is not sufficient documentation, but may be helpful. This documentation must include, but is not restricted to the following:

a. Diagnostic Interview

A diagnostic interview including a description of the presenting problem(s); relevant developmental, medical, psycho-social and employment histories; family history (including primary language of the home and the student's current level of English fluency); and a discussion of co-morbidity where indicated.

b. Assessment

A neuropsychological or psychoeducational evaluation is required and must provide clear and specific evidence that a learning disability exists and that alternative explanations for lower than expected performance have been ruled out. Assessment, and any resulting diagnosis, must consist of and be based on multiple forms of evidence (i.e., standardized test results, informal assessment results, observational and historical data) that supports a learning disability diagnosis. Evidence should be precise, objective, valid and acceptable in the field. Reports should follow statistically sound and widely accepted practices for interpreting data. Identifying a discrepancy between or among test scores is not sufficient to warrant the diagnosis of a learning disability or establish eligibility for accommodations. Evidence must establish a clear link between specific deficit areas and the functional limitations experienced by the individual.

For the evaluation to illustrate a substantial limitation to learning, the comprehensive assessment battery must assess the following domains:

- Aptitude / Cognitive Ability
- Academic Achievement
- Information Processing

c. Clinical Summary

The clinical summary must (a) indicate the substantial limitations to major life activities posed by the specified learning disability, (b) describe the extent to which these limitations impact the academic context for which accommodations are being requested, (c) suggest how the specific effects of the learning disability may be accommodated, and (d) state how the effects of the learning disability are mediated by the recommended accommodations.

d. Currency

To establish the need for accommodation, documentation must reflect *the current impact* of the learning disability. Testing should have been conducted within the past three (3) years for a high school student entering college and within the past five years for an adult.

For detailed information refer the to the documents entitled, "Learning Disability Documentation Guidelines for Students at Edgewood College."

V. Attention Deficit Hyperactivity Disorder

Individuals requesting accommodations on the basis of attention deficit hyperactivity disorder (ADHD) must provide documentation by a professional who has undergone comprehensive training and has relevant experience in differential diagnosis and the full range of psychiatric disorders (e.g., licensed clinical psychologist, neuropsychologist, psychiatrist and other relevantly trained medical doctors). The documentation must include the following:

- a. Evidence of early impairment. The condition must have been exhibited in childhood in more than one setting.
- b. Evidence of current impairment. An assessment of the individual's presenting attentional symptoms and evidence of current impulsive/hyperactive or inattentive behaviors that significantly impair functioning in two or more settings must be provided. In an academic setting, functional impairment is most often expressed in poor academic performance across a variety of academic tasks. In adults, work history may demonstrate an inability to retain or maintain employment.
- c. A diagnostic interview. The interview must contain self-report and third-party information pertaining to

- developmental history, family history of ADHD or other learning or psychological difficulties, relevant medical and medication history, a thorough academic history, a review of prior psychoeducational test reports to determine whether a pattern of strengths or weaknesses is supportive of attention or learning problems.
- d. Evidence of alternative diagnoses or explanations being ruled out. The documentation must investigate and discuss the possibility of dual diagnoses and alternative or coexisting mood, behavioral, neurological and/or personality disorders that may confound the ADHD diagnosis.
 - e. Neuropsychological or psychoeducational assessment is needed to determine the current impact of the disorder on the individual's ability to function in an academic setting, and to establish eligibility for classroom accommodations including alternative testing, note takers and/or alternative media (taped books/electronic text). Such data should include subtest and standard scores.
 - f. A specific psychological diagnosis as per the Diagnostic and Statistical Manual-IV (DSM-IV). Symptoms of hyperactivity/impulsivity that were present in childhood, and the current symptoms which have been present for at least the past six months and which impair functioning in two or more settings (e.g., school, work, home) must also be identified.
 - g. An indication of whether or not the student was evaluated while on medication and the degree to which the prescribed treatment reduces the level or degree of impairment.
 - h. A clinical summary which (a) indicates the substantial limitations to major life activities posed by the disability, (b) describes the extent to which these limitations would impact the academic context for which accommodations are being requested, (c) suggests how the specific effects of the disability may be accommodated, and (d) states how the effects of ADHD are mediated by the recommended accommodations.

(These guidelines were adopted from "The Consortium Guidelines for Documentation of Attention-Deficit/Hyperactivity Disorder in Adolescents and Adults" (1998), The Consortium on ADHD Documentation.)

VI. Traumatic Brain Injury (trauma to the brain resulting from cerebral vascular accidents, tumors, or other medical conditions)

Individuals requesting accommodations on the basis of a traumatic brain injury (TBI) or brain insult must provide documentation by a neuropsychologist. Depending upon the impact of the disability, documentation from other specialists may be necessary. The documentation must include

- a. Thorough neuropsychological evaluation including assessment of the areas of attention, visuoperception/visual reasoning, language, academic skills, memory/learning, executive function, sensory, motor, and emotional status. Data should include subtest scores and percentiles.
- b. Evidence of current impairment. A history of the individual's presenting symptoms and evidence of behaviors that significantly impair functioning.
- c. A diagnostic interview. The interview must contain self-report and third-party information pertaining to developmental history, family history, learning or psychological difficulties, relevant medical history, and a thorough academic history.
- d. Evidence of alternative diagnoses or explanations ruled out. The documentation must investigate and discuss the possibility of dual diagnoses and alternative or coexisting mood, learning, behavioral, and/or personality disorders that may confound the diagnosis.
- e. A specific psychological diagnosis as per the Diagnostic and Statistical Manual-IV (DSM-IV).
- f. A clinical summary that (a) indicates the substantial limitations to major life activities posed by the disability, (b) describes the extent to which these limitations would impact the academic context for which accommodations are being requested, (c) suggests how the specific effects of the disability may be accommodated, and (d) states how the effects of the disability are mediated by the recommended accommodations.

VII. Psychiatric Disability

Individuals requesting accommodations on the basis of a psychiatric disability must provide the current documentation from a licensed

psychologist, psychiatrist, or licensed clinical social worker, which must include

- a. A specific, current psychiatric diagnosis as per the DSM-IV which indicates the nature, frequency and severity of the symptoms upon which the diagnosis was predicated. A diagnosis without an explicit listing of current symptoms is not sufficient. Primary and secondary Axis I and Axis II diagnoses are required.
- b. Evidence of current impairment. An assessment of the individual's presenting symptoms and evidence of current behaviors that significantly impair functioning must be provided. In an academic setting, functional impairment is most often expressed in poor academic performance across a variety of academic tasks.
- c. Evidence is needed to determine the current impact of the disorder on the individual's ability to function in an academic setting and to establish eligibility for classroom accommodations including alternative testing, note takers, and/or alternative media (taped books/electronic text).
- d. Prescribed medications, dosages and schedules which may influence the types of accommodations provided.
- e. A clinical summary that (a) indicates the substantial limitations to major life activities posed by the psychiatric disability, (b) describes the extent to which these limitations would impact the academic context for which accommodations are being requested, (c) suggests how the specific effects of the psychiatric disability may be accommodated, and (d) states how the effects of the psychiatric disability are mediated by the recommended accommodations.

POLICY AND GUIDELINES APPLYING TO NONDISCRIMINATION ON THE BASIS OF DISABILITY

Policy Statement

It is the policy of Edgewood College to ensure that no qualified person shall, solely by reason of disability¹, be excluded from participation in, or be denied the benefits of, employment, program, or activity operated or provided by Edgewood College. This policy applies to all employees and students at Edgewood College.

Part I—Policy Implementation

A. Disability disclosure

A student, applicant for admission, an employee, or applicant for employment may disclose the presence of a disabling condition and request the accommodations she or he believes are requisite for obtaining equal access to, participation in, employment, or benefits of Edgewood College programs and activities by completing an Edgewood College Application for Accommodations available in the Disabilities Services Coordinator's office for students or the Human Resources office or the ADA Coordinator for employees.

B. Accommodation requests

An employee who wants to request an accommodation completes the Staff/Faculty Disability Accommodation Request Form and gives it to her or his supervisor/chair, or the Director of Human Resources. In considering the request, the department chair or unit director must consult with the appropriate Dean, Director, or ADA Coordinator prior to making an initial decision to honor or deny the request. The employee may consult with the ADA Coordinator.

A student who wants to request an accommodation completes the Student Accommodation Request form and submits it to the Disabilities Services Coordinator. The form is available at the Student Resource Center in 206 DeRicci.

¹ For purposes of this policy, disability has the same meaning as handicap under Section 504 of the Rehabilitation Act of 1973. 29 USC ss. 706(8), 794; 34 C.F.R. s. 104.3.

C. Confirmation of a disability

It is the responsibility of the student or employee to provide medical or other diagnostic documentation of his or her disability as requested by the Human Resources Director or the ADA Coordinator for employees or the Disabilities Services Coordinator for students. Students or employees may be required to participate in additional evaluation of limitations prior to receiving the requested accommodations. Additional evaluations or documentation will be the employee's or student's responsibility. For additional information about documentation, please refer to the Disability Documentation Guidelines.

Each student will be expected to make timely and appropriate disclosures and requests (at least eight [8] weeks in advance of a course, workshop, program or activity for which accommodations are requested), and to engage in appropriate levels of self-help in obtaining and arranging for accommodations or auxiliary aids, including applying for funding for specialized support services from the State of Wisconsin Division of Vocational Rehabilitation.

D. Coordination of services

Accommodation requests made by employees will be coordinated by the ADA Coordinator.

Requests for student academic or facility-related accommodations will be coordinated by the Disabilities Services Coordinator located in the Student Resource Center (SRC), DeRicci 206.

E. Appeal of denied accommodation requests

If a student or employee who is denied requested accommodations wishes to appeal the decision, she or he may do so in accordance with the procedure set forth in Section G., below.

F. Institutional documentation

All requests for and subsequent college responses to requests for accommodations will be documented by the Disabilities Services Coordinator for students and the ADA Coordinator for employees. It will be the responsibility of the ADA Coordinator to prepare an annual report to be submitted to appropriate administration and planning offices.

G. Section 504/ADA grievance procedure

If a student believes that Edgewood College has inadequately applied the principles and/or regulations of Section 504 of the ADA, or believes he or she has been discriminated against on the basis of a disability, the person may file a complaint.

1. Step One

A student who believes she or he has a valid basis for complaint shall discuss the concern with the Disabilities Services Coordinator, who shall in turn investigate the complaint and reply to the complaint in writing within fifteen (15) business days of receipt of the written complaint. If this reply is not acceptable to the complainant, she or he may take further action within thirty (30) days in accordance with section G.2.

2. Step Two

- a. The student/complainant shall prepare a written and signed statement, which shall be filed with the Disabilities Services Coordinator no later than thirty (30) business days following the date of the written reply received by the student/complainant under section G.1, above. The ADA Grievance Committee shall further investigate and reply in writing to the student/complainant within thirty (30) business days.
- b. If the student/complainant wishes to appeal the decision of the ADA Grievance Committee, he or she may submit a signed statement of appeal to the Vice-President for Academic Affairs within five (5) business days after receipt of the ADA Grievance Committee response as set forth in section G.2.a, above. The Vice-President for Academic Affairs, or her or his designee, shall meet with all parties involved, formulate a conclusion, and respond in writing to the grievance within thirty (30) business days. Attendance at the meetings of the Grievance Committee is limited to the student/complainant and Edgewood College staff and faculty. The Grievance Committee will consider additional written statements from treating or consulting professionals with whom the student/complainant is currently working, or with whom he or she has worked in the past.

Any student filing a grievance will not be subject to retaliation either during the appeal process or after its conclusion.

The ADA Grievance Committee will consist of three to five (3-5) individuals knowledgeable in disability issues and the nature of the grievance, and includes the Associate Academic Dean as chair.

Part II – Program Accessibility

A. General

To the extent of the law, qualified persons may not be denied the benefits of or excluded from participation in any Edgewood College program or activity because College facilities are inaccessible or unusable by persons with disabilities.

B. Existing facilities

Each program or activity should be operated so that, when reviewed in its entirety, it is readily accessible to qualified persons with disabilities, through means such as:

1. Reassignment of class locations, staff, or services to accessible buildings, or
2. Redesign of equipment or facility after individual case review.

Providing one or two accessible outside entrances to a building makes entrance to the building itself accessible; it is not required that every outside entrance be accessible. Structural changes in existing facilities are not required when other methods provide program accessibility.

Priority will be given to methods that offer programs and activities to persons with disabilities in the most integrated setting possible.

If sufficient relocation of classes or activities is not possible using existing facilities, structural alterations to ensure program accessibility should be made. Students may not be excluded from a specifically requested course offering or activity because it is not offered in an accessible location. Every section of a specifically requested course or activity, however, need not be made accessible.

Remodeling projects must be consistent with the "ADA Standards for Accessible Design" (ADADG) DOJ 28 CFR, Part 36 Revised as of

July 1, 1994, and federal or state building codes or other regulations that specify equivalent access to the facility or part of the facility.

C. New Construction

New facilities, or parts of facilities, constructed for the use of Edgewood College, must be designed and built so that the buildings and its parts are readily accessible to and usable by persons with disabilities. New construction must be planned in accordance with the ADADG and federal or state building codes or other methods which provide equivalent access to the facility or part of the facility.

D. Off-Campus programming

Programs not wholly operated by Edgewood College that require student participation in educational activities or internships (for example, in connection with student teaching assignments) should assure these activities, as a whole, provide an equal opportunity for the participation of qualified persons with disabilities.

Because Edgewood College may occasionally hold classes, programs, or activities in private facilities, steps should be taken to use facilities that are accessible. Contractual or lease agreements should reflect efforts to ensure accessibility. It is the responsibility of the prospective employee or student to give sufficient advance notice of the need for any special accommodation or auxiliary aids (e.g., physical accessibility, interpreter, large print), in order for accommodations to be made.

Part III – ACADEMIC ADJUSTMENTS

A. Academic requirements

Academic requirements will be modified as necessary to ensure that they do not discriminate against qualified students with disabilities. These modifications should not affect the substance of the educational programs or compromise educational standards, nor should they intrude upon legitimate academic freedom. Modifications may include changes in the length of time needed for the completion of degree requirements, substitution of specific courses required for the completion of the degree, and modification of the manner in which specific courses are conducted.

Academic requirements that are essential to programs of instruction (e.g., a French major or minor taking a foreign language) or to any directly related licensing requirement (e.g., licensing for nursing or teaching) are not regarded as discriminatory.

B. Program examinations and evaluations

Examinations or other procedures for evaluating students' academic achievement should be adapted to permit evaluating the achievement of students who have a disability; the results of the evaluation must represent the student's achievement in the program or activity, rather than reflecting the student's disability. It is the student's responsibility to request test accommodations at the beginning of each course for which accommodations are necessary. Academic and testing accommodations may include but need not be limited to:

- * enlarged materials
- * oral test
- * taped test
- * extended time
- * preferential seating
- * environment free of distractions
- * use of computer
- * alternative format
- * scribe
- * reader
- * brailled material
- * real-time captioning
- * sign language interpreting

These services are coordinated by the Disabilities Services Coordinator, located in the Student Resource Center (SRC), DeRicci 206.

C. Academic support services

No qualified student or participant in a College program or activity will be denied benefits of, excluded from participation in, or otherwise discriminated against because of the absence of educational support services. As long as no qualified person with a disability is excluded from a program because of the lack of an appropriate service, such support need not be on hand at all times. It is the responsibility of the individual to request the necessary accommodation or auxiliary aid in a reasonable amount of time to ensure appropriate services can be provided, preferably at least eight (8) weeks before classes, programs, or activities begin.

Prohibition against the use of special equipment or accommodations such as tape recorders or brailers in classrooms, or guide dogs in campus buildings, or other rules that have the effect of limiting the participation of qualified students in educational programs or activities may not be imposed.

Students or participants in College programs or activities may be required to sign an agreement that he or she will not release tape recordings or transcriptions of lectures.

D. Physical education², athletics, and similar activities

Edgewood College may not discriminate on the basis of disability in physical education, athletics, and similar programs and activities. Qualified disabled students or participants in Edgewood College programs or activities should be provided with an equal opportunity to participate in physical education courses as offered, intercollegiate and intramural athletics or other similar activities. For example, a student in a wheelchair could not be denied the opportunity to enroll in a regular archery course, nor could a deaf student be excluded from participating in a wrestling course.

Students who cannot participate in regularly offered physical education courses or who cannot compete in athletic programs due to disability may be offered physical education and athletic activities that are separate or different, provided that the programs and activities are operated in the most integrated setting possible. If accommodation is not possible in a required course, appropriate course substitution alternatives will be determined on an individual basis.

Part IV – OTHER

A. Housing

Students with disabilities will be provided with comparable, convenient, and accessible on-campus housing/food service at the same cost as that provided to students who are not disabled.

B. Financial aid

Edgewood College will not provide less financial assistance to students with disabilities than is provided to non-disabled students, limit their eligibility for assistance, or otherwise discriminate against them. Financial aid awards should recognize the special needs of students with disabilities, including the possible need for reducing credit loads or extending the time allowed to complete graduation requirements. Edgewood College follows all federal and state policies and guidelines governing financial aid requirements, eligibility, and disbursements.

C. Employment

² Guidelines regarding physical education courses will apply at such time that Edgewood College offers regular physical education courses.

It is the policy of Edgewood College to administer all of its employment practices in a non-discriminatory manner. Edgewood College does not discriminate on the basis of handicap as prohibited by Section 504 of the Rehabilitation Act of 1973 or the Americans with Disabilities Act of 1990, or any other basis prohibited by federal, state, or local fair employment laws or regulations.

D. Advising, counseling and career services

Personal, academic, or career counseling and guidance will be provided in an accessible setting without discrimination on the basis of disability.

E. Extracurricular activities

Before providing official recognition of or assistance to campus organizations, the Dean of Students Office should receive assurance that the organization does not permit actions prohibited by these guidelines.

Compliance with Applicable Federal, State and Local Laws

This policy is subject to amendment. Edgewood College reserves the right to amend, add to, delete from, or modify this policy, and any others, for any purpose, including compliance with local, state, or federal law.

References

Portions of this document are taken from and modified with permission from the *University of Wisconsin System Policy and Guidelines Applying to Nondiscrimination on the Basis of Disability, 1988 and 2001*.

Section 504 of the Rehabilitation Act of 1973

The American with Disabilities Act of 1990

Part 104 *Code of Federal Regulations* – Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance