

Dear Colleagues,

The Harris Family Center for Disability and Health Policy (^{HF}CDHP) strives to provide all students with disabilities an equitable academic experience. Our mission is to increase the number of qualified individuals with disabilities to successfully pursue careers in the health professions at WesternU. We support the University's commitment to humanism by providing support services and

Helen Keller playing chess
with Anne Sullivan

academic accommodations to students with disabilities. We share information, promote awareness of disability issues, and ensure access for students within the University Community.

In support of our mission, our team has developed a Quick Reference Guide with valuable information to assist you in your role. The guide contains information regarding the role of the College Accommodation Liaison (CAL), disability legislation relevant to higher education, student academic accommodations, ^{HF}CDHP's enrollment process, the accommodation memorandum, ^{HF}CDHP's grievance procedure, maintaining student confidentiality, and ^{HF}CDHP's exam proctoring procedures.

We thank you for your commitment and unwavering support to students with disabilities at WesternU. Your selfless contributions further our students' success. We hope you find the information on the following pages helpful and relevant to implementing student accommodations within your college timely and with fidelity.

Lastly, we would like to extend our appreciation and gratitude to Marcelle Daniels, Director of ^{HF}CDHP, and Sandra Rainwater-Lawler, Associate Director of ^{HF}CDHP. Their expertise and support for students with disabilities were invaluable to the creation of this guide.

"I long to accomplish a great and noble task, but it is my chief duty to accomplish small tasks as if they are great and noble."

- Anne Sullivan

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ROLE OF THE COLLEGE ACCOMMODATION LIAISON

CAL posing with a student

At WesternU, each college has a designated College Accommodation Liaison, or CAL, an administrator who serves as a confidential liaison between the student, disability office, and the faculty of a specific program or college within the University. This individual works in collaboration with ^{HF}CDHP staff to implement the reasonable accommodation(s) and academic adjustments approved by the Center for students with disabilities. Importantly, while the CAL serves as the liaison, they **are not** the decision-making authority to determine accommodations and do not review or retain third-party medical documentation related to the student's disability(ies). They do, however, provide guidance on program specifics that aid ^{HF}CDHP in making accommodation decisions. CAL(s) are also responsible for managing students' academic accommodations and adjustments within the college over the course of the student's academic journey.

RESPONSIBILITIES OF THE CAL

CAL(s) are responsible for the following:

Making themselves available to students to discuss the implementation of the accommodations and adjustments and **not** the diagnosis or specific disability.

Consulting with the appropriate faculty and ^{HF}CDHP staff when the approved accommodation(s) would impede conducting the fundamentals of the faculty member's curriculum so that an equally effective alternative accommodation(s) can be discussed.

Denying a request for accommodation(s) that ^{HF}CDHP has not approved and referring the student back to the Center for assessment.

Participating in a collaborative discussion with ^{HF}CDHP about the delivery of accommodations.

Implementing all approved accommodations and academic adjustments in a timely manner and with fidelity.

Maintaining confidentiality of the Accommodation Memorandum, correspondence, and communication regarding the student's disability.

MEET THE CALS

CALs can be excellent resources for one another. Considering this, we have included a CAL contact list. Feel free to reach out to one another as your college may have come across a situation and solution to implementing student accommodations that might help another colleague.

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DISABILITY LEGISLATION

With the passage of Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act in 1990, individuals with disabilities are protected by broad-based civil rights legislation. This legislation includes specific directives to institutions of higher education such as WesternU. Individuals covered under the legislation have the right to file a complaint with the Office for Civil Rights (OCR), or to sue if they believe they are discriminated or retaliated against on the basis of their disability or perceived disability. Considering this, it is important for CALs to have a basic understanding of federal and state laws governing students with disabilities.

A group of protesters led by Judy Heumann and Justin Dart Jr. carrying a banner quoting Martin Luther King, Jr. as they march for disability rights

Federally, WesternU is governed by **Section 504 of the Rehabilitation Act of 1973, as amended**, which prohibits programs or activities receiving federal financial assistance from “excluding participation, denying the benefits of, or subjecting to discrimination an otherwise qualified individual with a disability... solely by the reason of their disability.”¹ In 1990, Congress extended this prohibition to the private sector with the **Americans with Disabilities Act (ADA) of 1990**. The ADA reinforces the provisions of the Rehabilitation Act of 1973 and is the most comprehensive federal civil rights legislation protecting the rights of individuals with disabilities. The ADA addresses the barriers and discrimination that people with disabilities have traditionally faced and mirrors Section 504's definition of disability [42 U.S.C. § 12102(1)].²

Capitol Hill Crawl in 1990 to urge Congress to pass the Americans with Disabilities Act

The ADA defines individuals with disabilities “as a person who has a physical or mental impairment which substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.”³ The key factor in determining whether a person is considered disabled under the ADA is whether the physical or mental impairment results in a substantial limitation of one or more major life activities. Major life activities, as defined in the regulation, include functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. Title III of the ADA prohibits disability-based discrimination by private colleges and universities. These protections include nondiscrimination requirements, the provision of reasonable accommodations, and architectural standards.²

President George H.W. Bush
signs the ADA into law

The Americans with Disabilities Act of 1990 was amended by Congress in 2008. The ADA Amendments Act (ADAAA) of 2008 expanded the description of disability to promote broad coverage for people with disabilities. What constitutes a “major life activity” was clarified to include a wide range of activities, including concentrating, communicating, and thinking.

This clarification elucidated the range of conditions that may be understood as disabilities and warrant accommodation by postsecondary schools including, for example, learning disabilities and psychological conditions. The ADAAA also underscored that the determination of whether an individual’s impairment qualifies as a disability under the law should not require extensive analysis.⁴

WesternU must also abide by Section 508 of the Rehabilitation Act of 1973, as amended. Section 508 specifies that agencies including universities receiving federal funds must make their electronic information accessible to people with disabilities and applies to the development, procurement, maintenance, or use of electronic information technology. Under Section 508, institutions must give disabled employees and members of the public access to information that is comparable to the access available to non-disabled people.⁵

Hale Zukas, Ron Washington, and Judy Heumann
responding to a question during the 1977 sit in

tutions, such as the **Unruh Civil Rights Act**⁶ and the **Disabled Persons Act**,⁷ which prohibit disability-based discrimination by any business establishment. Furthermore, **Government Code 11135** prohibits discrimination for entities that receive state funds.⁸

The state of Oregon also has several legislative statutes that govern access in higher education. For example, ORS 185.155 states that “the Oregon Disabilities Commission shall monitor the progress of each institution or college in accomplishing the elimination of barriers to access and shall be consulted if access needs and priorities determined by the physical access committee are significantly revised” [1991 c. 935§4].⁹

“Disability only becomes a tragedy when society fails to
provide the things we need to lead our lives.”

- Judy Heumann

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STUDENT ACCOMMODATIONS

What is an accommodation?

Accommodations are modifications or adjustments to the tasks, environment or to the way things are usually done that enable individuals with disabilities to have an equal opportunity to participate in an academic program or a job without fundamentally altering the essential nature of a course, academic program, or job, or result in an “undue administrative or financial burden.”

Wooky Chadsey, DVM 2028

How do accommodations support students?

Remove barriers to learning.

Meant to ensure all students have the same level of access to education.

Accommodations are a right, not a privilege, and are protected by federal and state civil rights legislation specific to disability.

Accommodations are **not reasonable** if they:

Pose a direct threat to the health or safety of others.

Fundamentally alter the curriculum or an essential element of the course.

Pose an undue administrative, or financial burden.

TYPES OF ACCOMMODATIONS

Student accommodations can be tailored to the types of classes WesternU offers and differ from one student to another. ^{HF}CDHP provides accommodations for didactic, laboratory, and clinical settings. On the following pages are some of the accommodations that ^{HF}CDHP provides; however, this is not an exhaustive list. Accommodations are approved on an

individual basis based on an interactive process and the documentation the student provides.

Adaptive and Ergonomic Furniture – Generally, WesternU’s classrooms are accessible, however, some students require alternative furniture that allows them to fully participate in their courses. ^{HFC}DHP provides adaptive/ergonomic furniture options such as padded or supported seating, adjustable height tables, stools, and lecterns.

Adaptive Equipment - special versions of already existing technologies or tools that provide enhancements or different ways of interacting with the technology. The adaptation helps individuals with a disability accomplish a specific task. Examples include large print books, software to adjust screen colors, alternative types of keyboards and mouse, etc.

Alternative Media - refers to an alternative or different format of materials, such as textbooks, which may include e-text, large print, Braille, text to speech software, etc.

Assistive Technology - any device, software, equipment, or tool that helps individuals with disabilities improve, maintain, or increase their functional capabilities. Examples include screen readers, magnification applications, on-screen keyboards, etc.

Auxiliary Aids and Services - items, equipment, or services that assist in effective communication between a person who has a hearing, vision, or speech disability and a person who does not. Examples include readers, text to speech software, interpreters, real-time captioners, etc.

Audio Record Lectures – access to recordings of class lectures is permitted under the ADA for students as a disability-related accommodation to provide equitable access to the learning experience. Recordings are not to be shared or otherwise disseminated in any way without the faculty’s approval.

Clinical Accommodations – may include scheduling the order of rotations differently, specific locations, access to accessible parking at sites, set number of hours per day/week, etc.

Closed Captioning - process of displaying text on a television, video screen, or other visual display to provide additional or interpretive information. Closed captioning allows the user to turn the captions on or off on both online and offline videos.

Communication Access Realtime Translation (CART) - is the method of captioning in which captions are simultaneously prepared and transmitted at the time of origination by specially trained real-time captioners.

Extended Time on Assignments - some disabilities impact a student's ability to complete assignments. In cases such as these, flexibility in assignment due dates may be considered an appropriate accommodation.

Extended Time for Quizzes and Exams - additional time for taking and completing quizzes and/or exams because of a student's functional limitations. Extended time is typically approved in increments of either 1.25X, 1.5X or 2.0X the allotted time.

Frequent Breaks/Breaks as Needed - for some students with disabilities, sitting for long periods of time and/or remaining in the same position throughout a class, lecture, quiz, or exam can exacerbate symptoms of the student's disability. Similarly, some students may need to attend to medications or other medical needs.

Intermediaries or Surrogates - these assistants operate similarly to a scribe in an exam setting, they assist the student without making clinical or research judgements. At all times the student with a disability must direct the intermediary or surrogate. The intermediary or surrogate may be used as the patient if the student with a disability could be injured acting in this capacity.

Note-taking - students who, because of their disability may be unable to take their own notes or need to supplement their notes, may require notetaking as an accommodation. ^{HF}CDHP provides two types of notetaking accommodations: in-class peer note-taking services and assistive technology for notetaking.

Priority Seating - students with disabilities may request assistance in obtaining appropriate classroom seating. Requests include seating near the front of the room, seating near an interpreter or microphone, seating near or away from windows, seating near the exit, and/or seating on the entry-level of a multi-level classroom.

Reader/Scribe – a reader can be a person or a technological device which provides an auditory format for written exams. A scribe is someone who writes or types what a student dictates for a written quiz or exam.

Reduced-distraction or Private Room for Testing – a distraction-reduced or private room testing environment is a setting outside the usual classroom that limits interruptions and other environmental influences.

Service Animal – a dog or in some cases a miniature horse that is trained in a specific task to assist a person with disabilities. Service animals are allowed access to all public areas with some exceptions due to health and safety reasons.

Sign Language Interpreters - someone who interprets in sign language effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

For information on ^{HF}CDHP's accommodation policies and procedures, please refer to Appendix A. The following policies and procedures are included there:

Provision of Academic Accommodation(s)

Accessible Media

Alternative Media Policy and Procedure

Animals on University Property Policy

Exam Proctoring Procedures

Extended Time on Assignments

Requesting/Cancelling Remote Communication Access Realtime Translation (CART) Services Procedure for Students who are D/deaf or Hard-of-Hearing

Sign Language Interpreter Request/Cancellation Procedures for WesternU Students and Patients who are D/deaf or Hard-of-Hearing

SERVICES PROVIDED

^{HF}CDHP provides individualized services for students with disabilities enrolled at WesternU. Below is some of the services we provide to students.

- Academic Accommodations
- Assistive/Adaptive Technology and Equipment
- Alternative Furniture
- Student Advisory Board
- Events
- Proctoring Quizzes and Exams
- Requesting Accommodations for Board Exams
- And more!

NAVIGATING THE REQUEST PROCESS FOR ACCOMMODATIONS ON CERTIFICATION, LICENSING, AND BOARD EXAMS

^{HF}CDHP shepherds students through the application process to request disability accommodations on national board exams by providing resources, feedback on personal statements, letters of support, completing required forms, and reviewing provider documentation. Please refer students that need this service to disabilityaccommodations@westernu.edu to schedule an appointment to meet with the Director of ^{HF}CDHP or their designee.

Marcelle Daniels, Director of ^{HF}CDHP, with Tabitha Perez
going over board certification accommodations.

ENROLLING IN SERVICES

Lft. Taylor Gahub, PharmD 2026, and rt.
LaDonna Cash, Admin. Assoc. I

WHO QUALIFIES FOR SERVICES?

According to Section 504 of the Rehabilitation Act of 1973, a person who meets the academic and technical standards required for admission or participation in the education program or activity, with or without reasonable modifications to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services.

HOW DO STUDENTS ENROLL?

Let's review the process for students to be assessed for and receive accommodations and/or academic adjustments through ^HFCDHP. Registration is an easy 4-step process.

Step 1: Submit Application

The student completes and submits the electronic Student Intake Form. The student emails ^HFCDHP a PDF version of disability-related documentation from a reputable source.

Step 2: Complete Intake Form and Provide Documentation

Upon receipt of the Student Intake Form and documentation, ^HFCDHP contacts the student by email within three (3) business days to schedule an appointment for an Introductory Meeting.

Step 3: Introductory Meeting

At this meeting, staff engage in the interactive process to discuss criteria for disability, the student's self-report of disability, functional limitation(s), known or anticipated barriers, and potential reasonable academic accommodations and/or adjustments.

Step 4: Enrollment Meeting

At the enrollment meeting, students continue to engage in the interactive process, are assigned accommodations, and review procedures for accessing accommodations. After the meeting, the student is emailed any necessary paperwork through DocuSign.

Accommodation Memorandum: Once accommodations have been approved ^HFCDHP will send the student's CAL the Accommodation Memorandum listing the student's approved accommodations.

Implementation: The CAL has three business days from receipt of the Accommodation Memorandum to implement the accommodations.

ACCOMMODATION MEMORANDUM

^{HF}CDHP provides CALs with an Accommodation Memorandum that serves as the mechanism of disclosure to include notifying the CAL that the student is registered with ^{HF}CDHP, has a qualifying disability, and that the student is entitled to the academic accommodations and/or adjustments for which the office has deemed the student eligible.

The memorandum lists the student's authorized accommodations and adjustments and specifies the types of assessments covered under each accommodation. For example, some test-

Sample Accommodation
Memorandum

ing accommodations would list the amount of extended testing time, the testing environment distraction-reduced or private room, the assessment the accommodation applies to such as didactic quizzes/examinations only, and the duration of the accommodations.

Be mindful that once the CAL receives an accommodation memorandum, they have an obligation to implement the academic accommodations and adjustments that have been determined by ^{HF}CDHP within **three business days**. Some accommodations require additional time to put into place. ^{HF}CDHP staff will work with the student's CAL and program faculty to ensure the accommodation is implemented as soon as possible and the student is notified should this occur. When faculty raise questions or concerns regarding the recommended accommodations, CALs are responsible for contacting ^{HF}CDHP for clarification or to discuss equally effective alternative accommodations. The approved accommodation must not fundamentally alter an essential requirement of a course or program.

REFERRING STUDENTS TO ^{HF}CDHP

Often students will disclose to their CAL that they have a physical or psychological impairment or that they had disability accommodations in the past. Refer them to ^{HF}CDHP for services, ask them if they would be willing to meet with a staff member for more information, and after the meeting follow up with an email.

EMAIL TEMPLATE

Dear Student,

Thank you for dropping by my office today to discuss your challenges with the curriculum. I wanted to take a moment to follow up with you because during the meeting you informed me that you had a disability and received disability-related accommodations during your undergraduate experience. The Harris Family Center for Disability and Health Policy or CDHP is an excellent resource and provides academic accommodations for students with disabilities enrolled at WesternU. For more information visit their website at <https://www.westernu.edu/cdhp/>. As we discussed, I am also copying the Director of CDHP on this email, since you mentioned that you wanted to connect with a staff member. I believe their services would be beneficial to you.

Sincerely,

When a student does not expressly mention that they have a disability, but you believe that they may, discussing campus resources and student services to include ^HFCDHP is an excellent way to provide the information. Always avoid using your clinical expertise to form an opinion based on your observation of the student. Follow up after the meeting with an email.

EMAIL TEMPLATE

Dear Student,

Thank you for dropping by my office today to discuss your challenges with the curriculum. I wanted to follow up with you because as we discussed during the meeting WesternU has many campus resources and student services that may benefit you. These include counseling services, the LEAD program, the disability office, faculty office hours, For your convenience, I have attached the contact information for these resources.

Sincerely,

GRIEVANCE PROCEDURE

WesternU is committed to providing equal educational opportunities for students with disabilities, who are otherwise qualified, in an academic environment free from harassment and discrimination. In compliance with the Americans with Disabilities Act of 1990 (ADA), the ADA Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, WesternU does not discriminate on the basis of disability in the administration of its education-related programs and activities. The grievance procedure set forth below is applicable to all students requesting or enrolled in services at ^{HF}CDHP. It covers all complaints regarding contesting accommodations or access to programs or activities. All other allegations of disability discrimination covering all complaints alleged to have occurred in any College program or activity can be reported via the Title IX and Equal Opportunity website.

^{HF}CDHP determines disability accommodations through an interactive process involving disability services professionals, appropriate members of the university community, and the student. We recognize that in any deliberative process that disagreements may occur because of misunderstandings, miscommunication, or lack of education around disability. In these instances, clarification, and effective communication can lead to a quick and effective resolution.

Throughout any of these procedures, students can expect to be treated with respect, receive a timely response, not experience any form of retaliation, and have their concerns dealt with in a confidential manner to the greatest extent possible. The university encourages students to bring up any concerns early, give clear and detailed information, and alert the Associate Director of ^{HF}CDHP in writing. Should your concern involve the Associate Director of ^{HF}CDHP, please contact the Director of ^{HF}CDHP.

GRIEVANCE PROCESS

In general, this policy is designed to address all disability-related disputes concerning the following:

1. Disagreements regarding disability status, requested service, academic accommodations or auxiliary aids, or modification of a course or academic requirement.
2. Inaccessibility of a program or activity.

Students may file a grievance through an informal and/or formal process. It is generally recommended that students attempt an informal resolution before filing a formal complaint; however, students have the right to request a formal resolution at any time. Note, for grade disputes involving a claim of harassment or discrimination on the basis of disability, this policy applies and not the Grade Appeal policy located in the College Catalog.

Optional Informal Resolution: A student with a concern covered by this policy may first attempt to resolve it at the informal level. ^{HF}CDHP works in collaboration with the student, faculty, and/or staff whom the concern arose through an interactive process to identify an agreeable solution.

Formal Complaint (Step 1):

The Formal Complaint process applies to disagreements regarding the determination and/or delivery of a requested service, accommodation, auxiliary aid or service, assistive technology, or modification of a college/university practice in an effective or timely manner; denial of a requested accommodation; inaccessibility of a WesternU program, service, or activity; harassment or disparate treatment because of a disability; and other instances in which a student believes that they have been subjected to discrimination on the basis of disability. The complaint should be filed as soon as possible, but no later than 30 calendar days from the decision that is being appealed.

A complaint must be in writing and include the following:

1. The complainant's name, student ID number (if applicable), address, email address, and phone number.
2. A clear statement of the request or concern, identification of the basis of the grievance, and sufficient detail supporting the basis of the appeal, including the identification of faculty or staff involved, course information, informal resolution efforts (if applicable), a chronology or timeline of events; and requested remedy.

The complaint should be filed with the Associate Director of ^{HF}CDHP at Western University of Health Sciences, 309 E. Second St., Bldg. 390, Pomona, CA 91766-1854 or by email at slawler@westernu.edu.

Upon receipt of a formal complaint, the Associate Director of ^{HF}CDHP or designee will review the complaint for timeliness and scope for the grievance process and provide the complainant with written notice acknowledging receipt of the complaint. If, upon receipt, it is clear that the complaint should be reviewed under WesternU's Non-Discrimination, Anti-Harassment and Non-Retaliation policies, the complainant will be notified and referred to the proper policy and department.

During the review of the complaint, the Associate Director will conduct a thorough and impartial investigation. In doing so, the Associate Director may interview, consult with and/or request written responses to the issues raised in the complaint and review all evidence, documents, and information from any individual believed to have relevant information, including faculty, staff, and students.

At the conclusion of the review, the Associate Director of ^{HF}CDHP will issue a written decision to the complainant which will include a summary of findings, determination of the complaint, and any proposed resolutions, if applicable. This written notice will also be shared with the College as appropriate and consistent with ^{HF}CDHP's Confidentiality, Release of Information, and Maintenance of Records Policy and applicable, privacy and confidentiality laws.

The standard of review is whether there is a preponderance of evidence to substantiate the complaint. When appropriate, the Associate Director may also apply the following standards: 1) would the accommodation result in a fundamental alteration of the program or an essential academic requirement; 2) would the accommodation impose undue financial or administrative hardship on the institution. If there is a preponderance of evidence (more likely than not) substantiating the complaint, the Associate Director, will then decide on the appropriate resolution for the grievance, which will be included in the written notice issued to the complainant. Such resolutions will be decided on a case-by-case basis and may include, but will not be limited to, approval and/or administration of a particular accommodation, remediation to address previously available opportunities, and/or facilitation of communications between the complainant and the person against whom the

grievance is filed. Any resolutions will be implemented promptly. The written notice will be issued to the student within 15 business days of filing the formal complaint. The deadline may be extended for good cause. In such instances, the complainant will be notified of the need to extend the deadline in writing.

Formal Complaint (Step 2): The complainant may challenge the decision of the Associate Director of ^{HF}CDHP or designee fulfilling this role on the grounds of bias or conflict of interest, or disagreement with the decision, by submitting a written challenge to the Director of ^{HF}CDHP, within 5 business days of the acknowledgement of receipt of the Associate Director's decision by submitting a written appeal. The Director has the discretion to designate an appropriate officer to review the challenge. If the original grievance was filed against the Director, then the University has the discretion to designate an appropriate officer to review the appeal.

The challenge should be filed with the Director of ^{HF}CDHP at Western University of Health Sciences, 309 E. Second St., Bldg. 390, Pomona, CA 91766-1854 or by email at mdaniels@westernu.edu.

Upon receipt of a formal challenge, the Director of ^{HF}CDHP or designee will review the complaint for timeliness and scope for the grievance process and provide the complainant with a written notice acknowledging receipt of the complaint.

During the review of the challenge, the Director will conduct a thorough and impartial evaluation. In doing so, the Director will review the Associate Director of ^{HF}CDHP's written decision and documentation pertaining to the decision; the Director may also interview, consult with and/or request written responses to the issues raised in the complaint and review all statements, documents, and information from any individual believed to have relevant information, including faculty, staff, healthcare provider, and students.

At the conclusion of the review, the Director of ^{HF}CDHP will issue a written decision to the complainant which will include a summary of findings, determination of the complaint, and any proposed resolutions, if applicable.

This written notice will also be shared with the College as appropriate as consistent with ^{HF}CDHP's Confidentiality, Release of Information, and Maintenance of Records Policy and applicable privacy and confidentiality laws. If the ground for the challenge is not satisfied, the Associate Director's decision will be upheld.

When appropriate, the Director may also apply the following standards: 1) would the accommodation result in a fundamental alteration of the program or an essential academic requirement; 2) would the accommodation impose undue financial or administrative hardship on the institution. If there is a preponderance of evidence (more likely than not) substantiating the complaint, the Director, will identify appropriate remedies and/or corrective actions to resolve the grievance, which will be included in the written notice issued to the complainant. Such resolutions will be decided on a case-by-case basis and may include, but will not be limited to, approval and/or administration of a particular accommodation, remediation to address previously available opportunities, and/or facilitation of communications between the complainant and the person against whom the grievance is filed. Any resolutions will be implemented promptly. The written notice will be issued to the student within 15 business days of filing the formal complaint. The deadline may be extended for good cause. In such instances, the complainant will be notified of the need to extend the deadline in writing.

Formal Appeal: The complainant may appeal the decision of the Director of ^{HF}CDHP by submitting a written appeal within 5 business days after the receipt of written notice from the Director to the Chair of ^{HF}CDHP's Appeal Committee. The chair of the committee will notify the student of the outcome 15 business days after the meeting has concluded.

Appeals must specify the reasons for the appeal that are not based on a disagreement or dissatisfaction with the standards, policies, or procedures of ^{HF}CDHP. The appeal must be based on one or more of the following:

1. The appearance of new, material, and documentable evidence that was not available at the time of the Director's review, and that would likely alter the outcome. Information available to the student but not provided during the hearing and/or the complaint review would not be considered "new."
2. Procedural error that significantly affected the interpretation of policies which affected the Director's review such that it prevented the Director from issuing a fair decision.

An appeal review is limited. Appeals are not a full rehearing of the complaint and are restricted to the appeal grounds referenced above. The findings contained in the written notice are presumed to have been decided reasonably and appropriately and the appellant carries the burden of proof to demonstrate that the appeal grounds are substantiated.

The appeal should be filed with the Eugene Brown, Chair of ^{HF}CDHP's Appeal Committee, at eugenebrown@westernu.edu. Appeals must contain, at a minimum, an explanation of why the determination is improper and a detailed statement of the basis for the appeal, including the specific facts, circumstances, and arguments in support of the appeal.

The Chair will convene the ^{HF}CDHP Appeal Committee to review (1) information provided by the student for the appeal; (2) review the decisions of the Director and Associate Director of ^{HF}CDHP; and (3) any other additional information that may be relevant to evaluating the matter and reaching a decision.

If there is a preponderance of evidence (more likely than not) substantiating the appeal, the Chair of ^{HF}CDHP's Appeal Committee will communicate the decision of the appeal and determine the appropriate resolution via written notification to the complainant and the College as appropriate and consistent with ^{HF}CDHP's Confidentiality, Release of Information, and Maintenance of Records Policy and applicable privacy and confidentiality laws. The Chair will issue a written decision within 15 business days after the meeting has concluded, although the deadline may be extended, in writing, for good cause. If the ground for appeal is not satisfied, the Director's decision will be upheld. During the grievance process contained herein any accommodations or services that have already been implemented will continue uninterrupted.

Additional External Reporting Options:

Any student who believes they have been subjected to discrimination, including harassment and retaliation on the basis of a protected category may contact the [Office of Title IX and Equal Opportunity](#) to file a report.

Students also have the right to file a complaint with the [U.S. Department of Education's Office of Civil Rights](#) if they feel they have experienced discrimination. More information about filing a complaint is available on their [website](#).

MAINTAINING STUDENT CONFIDENTIALITY

^{H^F}CDHP recognizes the rights of students with disabilities to maintain the confidentiality of their disability-related information and determine who receives it. Disability-related information provided to the ^{H^F}CDHP is considered an educational record; therefore, it falls under the protection of the Family Educational Rights and Privacy Act (FERPA). FERPA permits the ^{H^F}CDHP to share information about the impact of a disability and accommodation eligibility with other University school officials who have a legitimate educational interest. A school official includes but is not limited to faculty and instructional staff, academic deans, the provost, and security. Legitimate educational interest means the school official needs to review an educational record or receive educational record information to fulfill their professional responsibilities.

^{H^F}CDHP values the privacy of its students and the confidentiality of the disability-related information entrusted to us. As such, ^{H^F}CDHP limits disclosures of disability-related information to those which are minimally necessary for the delivery of services/accommodation of the student or for some other permissible basis. Examples of a permissible basis include, but are not limited to:

Disclosure based on a legitimate educational reason:

Disclosure to appropriate faculty and staff of the student's status as a student registered with ^{H^F}CDHP and their approved accommodations.

Disclosure to a WesternU official in relation to a student filed complaint, appeal, grievance, or lawsuit against a university action, office or employee.

Disclosure to the proper authorities to prevent/control injury or harm to the student or to others.

Disclosure subject to a court order.

Disclosure based on the student's written permission.

The degree of information that is required by university constituents regarding a student's disability is directly related to the nature of the accommodations and services required. Sharing this information does not require student consent under FERPA.

Disclosure of educational record information to a University official having a legitimate educational interest does not, however, constitute authorization for that person to transmit, share, or disclose any or all of that information to a third party who does not have a legitimate educational interest. When disability-related information may need to be shared with a third party, a student may sign a written consent form giving ^{HF}CDHP permission to discuss the disability with a third party, such as parents who require further information. Information will not be released to a third party without written consent from the student unless it is required by federal or state law or when a student may be at risk of harm to self or others.

Only authorized staff within ^{HF}CDHP have immediate access to student records. Disability documentation is maintained in locked cabinets, in locked offices, and on secure servers and is not part of the student's permanent educational record.

In accordance with WesternU policy, ^{HF}CDHP student records are destroyed five years after a student's graduation or date of last attendance. Students with disabilities have a right to review their file. A student who wishes to review their file must schedule an appointment with the Director of ^{HF}CDHP.

Let's review optimal practices for maintaining confidentiality of documents related to students with disabilities.

- Shred any paper created in the office on which private information - even just the student's name - is written, including sticky notes or phone message slips. Never put those in trash or recycling bins.

- If the institution has a mechanism for encrypting email or electronic records, use for electronic communications that contain student names or disability information.

- Keep student names and disability information out of email subject lines, which are not included in encrypted or secure systems and may be viewed on a computer screen by visitors to an office.

- Keep the office fax machine in a place where others cannot access it.

- Keep paper files locked when not immediately using them.

- Do not transport paper files to unsecure locations.

- Password protect electronic records, and limit access only to necessary staff.

- Keep electronic records "walled off" from access by other campus departments that may share the server or other online access.

EXAM PROCTORING PROCESS

CAL ASSESSMENT SPREADSHEET

Each college has its own password protected CAL Assessment Sheet. The CAL is responsible for maintaining and completing the spreadsheet in a timely manner. The assessment sheet must be filled out in its entirety and its format may not be altered (e.g., removing columns, rearranging columns, deleting cells, changing title of cells, etc.). In the event of a change that is less than 24 hours prior to the exam/quiz, contact ^{HF}CDHP by email immediately at disabilityaccommodations@westernu.edu.

Please note that ^{HF}CDHP's normal hours of operation are Monday through Friday, 8 AM to 5 PM. Any emails or notifications received outside of normal business hours will be reviewed and managed at the start of the next business day. Ultimately, failure to note information on the CAL Assessment Sheet causes delays in timely accommodations for students and completion of administrative tasks by ^{HF}CDHP staff.

The CAL Assessment Spreadsheet includes the following exam information:

| | | | | | |
|--------------------------|-----------------------------|----------------------------------|-------------------|---------------------------|---------------|
| Date | Cohort(s) | Course Name | Details | Instructions | Exam Location |
| Scheduled Start/End Time | | Assessment Duration | | Assessment Start/End Time | |
| | Student Name(s) for Makeups | | Primary OAA Staff | ExamSoft/Other | |
| Number of Students | | ^{HF} CDHP Exam Location | | Password (Case Sensitive) | |

MONTHLY EXAM SCHEDULE

^{H^F}CDHP maintains a master Monthly Exam Schedule listing exams for all enrolled students by college. Be mindful that ^{H^F}CDHP staff cannot schedule an exam without an exam date and time. Exam dates and times are critical for ^{H^F}CDHP staff to reserve rooms, assign proctors, collect testing materials, and send out exam notices to students.

EXAM NOTICES

Exam Notice for In-Person Exam

Exam Notice for Zoom Exam

Students and their designated CAL will receive an exam notice via email one day prior to the scheduled exam or quiz. The exam notice includes the time, date, location, title of the exam, allotted time, and allowable testing materials. Students are responsible for reviewing the information contained within the exam notice and monitoring their WesternU email daily. If there is an error on the exam notice, an updated notice will be emailed to the student.

Students are directed to contact the CAL for any questions or concerns regarding the content of the exam or quiz.

CAL RESOURCES

CAL QUARTERLY MEETINGS

^{HF}CDHP convenes regular meetings with the CALs to address and resolve accessibility and accommodation issues for students with disabilities. Each term ^{HF}CDHP staff facilitates a guided discussion on a critical topic. Feedback and recommendations are incorporated into ^{HF}CDHP's operations. These meetings are critical to providing optimal standard practices for the delivery of student accommodations.

^{HF}CDHP'S WEBPAGE

^{HF}CDHP's webpage is an excellent source of information regarding our programs, services, policies, procedures, assistive technology, and resources. Moreover, ^{HF}CDHP's Faculty and College Accommodations Liaison webpage provides a wealth of information about working with students with disabilities in a health science setting and the implementation of accommodations. Check it out at <https://www.westernu.edu/cdhp/>.

MEET THE **HF** CDHP STAFF

^{HF}CDHP staff is dedicated to assisting students with disabilities seeking careers in the health professions. Here is their contact information in case you need guidance on accommodations, policies and procedures and more.

Marcelle Daniels, M.HRD.

Director

909-469-5385

mdaniels@westernu.edu

Sandra Rainwater-Lawler, M.A.

Associate Director

909-469-5297

slawler@westernu.edu

Behrang Toubak, PsyD

Disability Specialist

909-469-5380

btoubak@westernu.edu

Jessica Ventura

Administrative Assistant I

909-469-5441

jventura@westernu.edu

LaDonna Cash

Administrative Associate I

909-469-5492

lcash@westernu.edu

Elizabeth Perez, MBA

Administrative Associate II

909-706-5503

pereze@westernu.edu

Consuelo Sanchez, M.A.

**Assistive Technology &
Alternative Media Specialist**

909-469-5486

csanchez@westernu.edu

**Marsha Blankenship
Administrative Assistant I
(Lebanon)**

909-469-0421

mblankenship@westernu.edu

APPENDIX A

^{HF}CDHP POLICIES & PROCEDURES

The following pages contain ^{HF}CDHP's policies and procedures regarding the provision of accommodations. They should be referred to for guidance when implementing the specific accommodations.



POLICY & PROCEDURE

Title: Provision of Academic Accommodation(s)

Effective Date: 03/21/2024, replaces previous policy dated 4/1/2021

Applies to: Prospective, matriculating, and enrolled students with disabilities at Western University of Health Sciences (WesternU)

Statement: WesternU is committed to providing qualified students with disabilities reasonable accommodation so they receive an equal opportunity to participate in and benefit from university academic programs, services, and activities as required by federal and state law.

Purpose: This policy provides the framework for which ^{Hf}CDHP establishes disability eligibility criteria, makes disability eligibility determinations, establishes appropriate reasonable accommodations, and the process for students to enroll in ^{Hf}CDHP services.

Related Information:

Reasonable Accommodation for Otherwise Qualified Individuals

The Americans with Disabilities Act defines disability “with respect to an individual as: (A) a physical or mental impairment that substantially limits one or more of the major life activities of such individual; (B) a record of such an impairment; or (C) being regarded as having such an impairment” (42 U.S.C. § 12102(2)). Disabilities may include, but are not limited to, learning differences or disabilities, physical and mobility impairments, sensory impairments, psychological disorders, and/or chronic health impairments. Students with a condition that rises to the level of a disability are entitled to reasonable accommodations. Conversely students that do not qualify as a person with a disability or have no disability-related need for the accommodation or modification would not qualify for accommodation.

WesternU is committed to providing reasonable academic adjustments, auxiliary aids, and/or program modifications (accommodations) to otherwise qualified students who self-identify as having a disability to ensure their equal access to the University’s services, programs, and activities as required by federal and state law.

^{Hf}CDHP is the designated office at WesternU to determine and approve specific academic modifications or accommodations.

Verification of Disability

It is the responsibility of the student with a disability to notify ^{Hf}CDHP of an accommodation request and to provide appropriate documentation to substantiate the limitations of the student’s disability. Students should review ^{Hf}CDHP’s [Requirements for Disability Documentation](#).

Eligibility for reasonable accommodations and services are determined holistically considering disability documentation, the student’s report of how their condition impacts them, perceived need

for accommodations, history of accommodations (if any), and program requirements including technical standards. Lack of accommodation history or specific documentation should not prevent a student from making a request for accommodation; however, to be considered a disability that warrants accommodation, the condition must limit one or more major life activities. ^{HF}CDHP may request additional documentation to support an accommodation request if needed.

Having received accommodations in high school through an Individualized Education Program (IEP) or a 504 plan does not automatically make a student eligible for services at WesternU. The student must register for services and provide supporting documentation for review; IEPs are not acceptable forms of documentation. If it is determined that a student is eligible to receive accommodations, the recommended accommodations may be different from those the student received in high school or during their undergraduate experience.

Assessment and Accommodations

^{HF}CDHP's involvement in the accommodation process is intended to provide students with disabilities with the legally mandated and necessary support to work toward a higher education and provide legal protection for faculty members and instructors. Should a student inform their college of the need for academic accommodations, the college should refer the student to ^{HF}CDHP. The student should then contact ^{HF}CDHP to begin the accommodation request process. Students are required to complete the Student Intake Form and submit documentation of their disability to disabilityaccommodations@westernu.edu. Upon receipt, ^{HF}CDHP staff will reach out to the student within three (3) business days to schedule an appointment to begin the interactive process. Given ^{HF}CDHP's role in the accommodation process is to provide students with disabilities with the legally mandated and necessary support to work toward a higher education, any requests made by students directly to instructional personnel related to their academic courses, even if implemented, are not considered a reasonable accommodation.

As each disability and the circumstances surrounding each request for accommodations are unique, accommodations for students will be determined on a case-by-case basis. Reasonable accommodations include but are not limited to academic modifications, auxiliary aids, test accommodations, assignment flexibility, mobility assistance, physical access, architectural modification, notetaker accommodations, disability management advising, accessible furniture, alternative media, real time captioning, and sign language interpreters.

^{HF}CDHP does not provide accommodations deemed unreasonable to include those that impose an undue economic or administrative burden on the University, fundamentally alter the academic program, an essential feature of the curriculum or technical standards of the program, lower the standards of the University, or jeopardize the safety of others. Moreover, ^{HF}CDHP does not provide services of a personal nature such as attendants, care takers, homework assistance or tutors, typing services or prescriptive aids such as eyeglasses or hearing aids, nor does it provide diagnostic evaluations of disabilities.

Enrollment in ^{HF}CDHP Services

Students will follow to the steps listed below to enroll in ^{HF}CDHP services:

Procedure Steps:

| | Action | Responsible for Implementing |
|---|--|--|
| 1 | Complete and submit the electronic Student Intake Form. | Student |
| 2 | Submit documentation of a disability to disabilityaccommodations@westernu.edu as outlined in the Requirements for Disability Documentation. | Student |
| 3 | Schedule an Introductory Meeting within three (3) business days of receipt of Student Intake Form and documentation. | ^{HF} CDHP Staff |
| 4 | During the Introductory Meeting, ^{HF} CDHP's Associate Director, Director, or Disability Specialist will engage the student in the interactive process to discuss criteria for disability, student's self-report of disability, functional limitation(s), known or anticipated barriers, and potential reasonable academic accommodations and/or adjustments. | Student/ ^{HF} CDHP Associate Director, Director, or Disability Specialist |
| 5 | Schedule Enrollment Meeting upon ^{HF} CDHP's determination that the student meets the criteria to be considered eligible for academic accommodations. | ^{HF} CDHP Staff |
| 6 | During the Enrollment Meeting, ^{HF} CDHP's Associate Director, Director, or Disability Specialist will continue to engage the student in the interactive process to assign accommodations and review policies and procedures for accessing them. | Student/ ^{HF} CDHP Associate Director, Director, or Disability Specialist |
| 7 | ^{HF} CDHP staff will email any necessary paperwork (i.e., Confirmation of Accommodations, policies, procedures, Confidentiality, Release of Information, and Maintenance of Records, and Student Handbook) to the student through DocuSign. | ^{HF} CDHP Staff |
| 8 | Upon approval of academic accommodation(s), ^{HF} CDHP will issue an Accommodation Memorandum to the College Accommodation Liaison (CAL) and | ^{HF} CDHP Staff |

| | | |
|----|--|--------------------------|
| | designated college staff. The student will be copied on the correspondence. | |
| 9 | The College has three (3) business days to implement the accommodation(s). Some accommodations require additional time to put into place. ^{HF} CDHP staff will work with the student's program faculty to ensure the accommodation is implemented as soon as possible and the student will be notified should this occur. | ^{HF} CDHP Staff |
| 10 | Should a student be dissatisfied with the delivery of accommodations, determination about accommodations, or other issues of access, the student will be referred to the Student Academic Accommodations Grievance Procedures . | Student |

Implementation of Accommodations

When a student is approved for academic accommodations, ^{HF}CDHP will need to notify the college at least three (3) business days before the accommodations can be implemented, ^{HF}CDHP will provide an Accommodation Memorandum to the College Accommodations Liaison (CAL) and designated personnel within the college. A copy will also be provided to the student for their records. The designated CAL within each WesternU college works in collaboration with ^{HF}CDHP to implement reasonable accommodations and academic adjustments for students with disabilities and is responsible for managing student academic accommodations within the college.

Accommodations are valid for the duration of the student's program unless otherwise stated on the Accommodation Memorandum. Provisional accommodations are occasionally provided on a conditional basis generally when information is not fully available, and the student is in the process of acquiring documentation or is undergoing an evaluation. ^{HF}CDHP may implement accommodations for a specific duration to allow the student the time to obtain the documentation. Temporary accommodations are extended to students with temporary disabilities only for the duration of the functional limitations associated with their condition.

Upon approval of accommodations, ^{HF}CDHP staff will also review the specific procedures for each accommodation for which ^{HF}CDHP has determined the student eligible. Students will be required to review, sign, date, and return the procedures to ^{HF}CDHP through DocuSign. Failure to return the procedures may result in a delay in implementation.

Should a student experience barriers within their curriculum or assessments, the student is responsible to contact ^{HF}CDHP immediately to discuss adjustments or modifications to their academic accommodations. Students can request a re-evaluation of their accommodations or request new accommodations at any time during their academic program. In such instances,

additional documentation may be necessary. Once approved, all accommodations will be implemented according to their scope and application in all applicable settings, accommodations, however, are not typically retroactive.

Definitions:

Academic adjustments: modifications to how students participate in classes and activities. These modifications allow students to meet standards, but do not change them.

Disability: a person who has a physical or psychological impairment that substantially limits one or more major life activities; or a record of such impairment; or is regarded as having such as impairment [42 U.S.C. §12102(1)].

Functional limitations: a restriction or impairment in a person's ability to function in a way that falls within the normal range for the activity.

Interactive process: is the process by which ^{HF}CDHP works together with a student to determine if the student has a qualifying disability that requires reasonable academic accommodations/ adjustments and the accommodations/adjustments that the institution will provide.

Qualified student with a disability: a student with a disability who meets the academic and technical standards requisite for admission or participation in the institution's educational program or activity (34 CFR Part 104).

Reasonable accommodations: modifications or adjustments to the tasks, environment or to the way things are usually done that enable individuals with disabilities to have an equal opportunity to participate in an academic program or a job without fundamentally altering the essential nature of a course, academic program, or job or result in an "undue burden."

Regulatory Information: Subpart E of Section 504 of the Rehabilitation Act of 1973, Title III of the Americans with Disabilities Act (ADA) of 1990, the ADA Amendments Act of 2008, California and Oregon state law.

Related Procedures: Accessible Media; Alternative Media Policy and Procedure; Exam Proctoring; Extension of Assignments; Requesting/Cancelling Sign Language Interpreters; and Requesting/Cancelling Remote Communication Access Realtime Translation (CART) Services

Related Links: [CDHP's Registration Process](#), [CDHP Documentation Requirements](#)

Responsible Department: Harris Family Center for Disability and Health (^{HF}CDHP)

Contact: Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Origination Date: 08/11/2006

Review Date: 03/21/2024

Next Review Date: 04/01/2027

Policy reviewed by: (check all that apply)

| | | | |
|-------------------------------|---|----------------------------|------------------------------|
| Academic Senate | X | General Counsel | Provost's Office |
| Biosafety Committee | | Human Resources | Radiation Safety Committee |
| Board of Trustees | | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | | Information Technology | Sponsored Programs |
| Clinic Administration | | Institutional Review Board | X University Risk Management |
| Dean's Council | | Operations Council | University Compliance Office |
| Directors of Operations | | President's Office | University Policy Office |
| Environmental Health & Safety | | Procurement | X University Student Affairs |



PROCEDURE

Title: Accessible Media

Effective Date: 3/20/2024

Applies to: All Students Enrolled at ^{HF}CDHP with Accessible Media as an Approved Accommodation

Statement: Closed captioning is critical for students who are D/deaf or hard-of-hearing, or those who may have a disability that requires audio description. Regardless of whether the class is online or in a classroom, a student who receives this accommodation needs closed captioning for all films, DVDs, video clips (online or offline), and transcriptions for all audio podcasts or other media presented in audio.

Purpose: To delineate the process that ^{HF}CDHP employs to remediate media with an auditory component so that it is accessible for students who are D/deaf or hard of hearing or those that may have a disability that requires audio description.

Related Information: Provision of Academic Accommodation(s) Policy

Procedure Steps:

| | Action | Responsible for Implementing |
|----|---|--|
| 1. | Once ^{HF} CDHP's Associate Director, Director, or Disability Specialist approves a student for accessible media services, ^{HF} CDHP will notify the designated College Accommodation Liaison (CAL) by emailing the student's accommodation memorandum which lists the accommodations for which the student is eligible. | ^{HF} CDHP Staff (Director, Associate Director, Disability Specialist) |
| 2. | The designated ^{HF} CDHP staff member will email the CAL a notification requesting the student's course numbers and faculty names as follows: Dear [Insert Name of CAL]: I am emailing you on behalf of ^{HF} CDHP, regarding [Insert Name of Student] who has an approved academic accommodation for closed captioned videos, and transcriptions for podcasts or other media in audio. Please email the names and course numbers for all applicable faculty members that ^{HF} CDHP will need to connect with to disabilityaccommodations@westernu.edu so that we can obtain their instructional materials. Please let me know if you have any questions. | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |

| | | |
|----|---|--|
| | Kind regards, | |
| 3. | <p>The designated ^{HF}CDHP staff member will follow up via email at the following intervals:</p> <ul style="list-style-type: none"> • Email CAL within 2 business days if course and faculty information has not been received. • Email/phone call to Vice/Associate Dean within 3 business days if course and faculty information has not been received. • If no response is received at 4 business days, the designated ^{HF}CDHP staff member will advise the student's counselor who will email/phone the Dean. | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |
| 4. | <p>Upon receipt of course and faculty information, the designated ^{HF}CDHP staff member will contact faculty via email and request all video, podcasts, or other media files be submitted to ^{HF}CDHP for closed captioning/transcription (audio only). Faculty will be advised to verify that the instructional materials do not have captions/transcriptions. The email also provides the details of the captioning process, file requirements, and the timeline for submission.</p> <ul style="list-style-type: none"> • For videos under 10 minutes, 3 business days prior to show date (weekends excluded) • For videos 10-20 minutes, 5 business days prior to show date (weekends excluded) • For videos 20-60+ minutes, 14 business days prior to show date • For videos that require audio descriptions, 10 business days prior to show date | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |
| 5. | <p>Upon receipt of files, ^{HF}CDHP will send the files to either ^{HF}CDHP's Assistive Technology and Alternative Media Specialist or to ^{HF}CDHP's approved vendor for processing depending on length of file, number of files, and show date(s).</p> | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |
| 6. | <p>The designated ^{HF}CDHP staff member will follow up on the processing status of the accessible media request 3 business days prior to the show date.</p> | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |
| 7. | <p>Upon receipt of closed-captioned materials or transcription files, the designated ^{HF}CDHP staff member will provide the files to the faculty and CAL.</p> | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |

| | | |
|-----|--|--|
| 8. | The faculty member is responsible for ensuring that all media being shown in classes with students approved for accessible media as an accommodation is captioned or transcribed (audio only). | Faculty Member |
| 9. | ^{HF} CDHP will maintain a copy of all materials that it captions/transcribes. | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |
| 10. | If the accommodation is approved through the duration the of program, the designated ^{HF} CDHP staff member will email the CAL one month before the start of each term. | ^{HF} CDHP Staff (Assistive Technology & Alternative Media Specialist) |

Definitions/Acronyms:

Closed caption: Process of displaying text on a television, video screen, or other visual display to provide additional or interpretive information. Closed captioning allows the user to turn the captions on or off on offline videos.

Deaf/deaf – Deaf with a capital “D” is used to describe individuals who identify as culturally Deaf and are actively engaged with the Deaf Community. Deaf with a lower-case “d” refers to individuals who view hearing loss as a physical condition.

Hard of Hearing – Is a widely accepted term to describe individuals who have hearing loss.

ADA – Americans with Disabilities Act of 1990

ADAAA – Americans with Disabilities Act Amendments Act of 2008

^{HF}CDHP – Harris Family Center for Disability and Health Policy

WesternU – Western University of Health Sciences

Regulatory Information: Sections 504 and 508 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990; ADA Amendments Act of 2008, and applicable California and Oregon state law

References, if applicable:

Related Policy: Provision of Accommodation(s); Sign Language Interpreter Request/Cancellation Procedures for WesternU Students and Patients who are D/deaf or Hard-of-Hearing; Real-time Captioning Request/Cancellation Procedures for WesternU Students who are D/deaf or Hard-of-Hearing

Related Links: [^{HF}CDHP Webpage](#), [Provision of Accommodation\(s\) Policy](#)

Related Forms: N/A

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Marcelle Daniels, Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

| | | |
|-------------------------------|----------------------------|------------------------------|
| Academic Senate | General Counsel | Provost's Office |
| Biosafety Committee | Human Resources | Radiation Safety Committee |
| Board of Trustees | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | Information Technology | Sponsored Programs |
| Clinic Administration | Institutional Review Board | X University Risk Management |
| Dean's Council | Operations Council | University Compliance Office |
| Directors of Operations | President's Office | University Policy Office |
| Environmental Health & Safety | Procurement | X University Student Affairs |



POLICY & PROCEDURE

Title: Alternative Media Policy and Procedure

Effective Date: 11/20/2023, Rev. 8/13/2025

Applies to: All Students with Disabilities Enrolled at ^{HF}CDHP with Alternative Media as an Approved Accommodation

Statement: Alternative media refers to an alternative or different format of materials, such as textbooks, which may include e-text, large print, Braille, text to speech software, etc. In keeping with the Harris Family Center for Disability and Health Policy's (^{HF}CDHP) policy that all students shall have equal access to educational materials, programs, facilities, admissions, and activities, ^{HF}CDHP makes every effort to provide material in alternate formats for students with disabilities.

Purpose: This policy was designed to delineate ^{HF}CDHP's process to provide students approved for this accommodation with timely and effective Alternative Media Services.

Related Information:

The Assistive Technology and Alternative Media Specialist will meet with the student to determine the appropriate format their accessible materials will be in. Students are provided with demonstrations of the available text-to-speech software (Kurzweil 3000 and Speechify) to determine the best option and additional training is provided as needed.

Students are responsible for submitting the Alternative Media Request form each term accessible materials are needed, specifically for those materials that are not already available in digital format through WesternU or in an accessible electronic format.

Materials released to students will need to have proof of purchase (receipt) submitted each term. For students enrolled in the College of Dental Medicine or College of Optometry using Vital Source, the WesternU Campus Store can provide a textbook receipt. Students can contact them by email at campustore@westernu.edu. Rental receipts are accepted, and materials will be available for the term requested.

If requested materials are not available from in-house libraries or publishers, students will be notified via their WesternU email to provide a digital file or bring their hard copy books/course materials to ^{HF}CDHP for in-house scanning. Scanning, depending on size and volume, may take one to two business days. Students will be emailed when their hard copy materials are ready for pickup.

^{HF}CDHP may cancel any textbooks/course materials requested for in-house scanning and conversion if they are not received by the requested date stated in the email. This includes digital materials that are requested for conversion. If students are unable to provide their materials by the requested date, they must contact ^{HF}CDHP immediately for an extension.

Students renting physical textbooks should note that ^{HF}CDHP cannot cut and scan them. This also includes any book materials checked out from the Harriet K. and Philip Pumerantz Library.

Any questions or concerns regarding the alternative media accommodation, formats provided, or difficulties accessing provided files should be directed to the Assistive Technology and Alternative Media Specialist at disabilityaccommodations@westernu.edu.

Alternative media is intended solely for the educational purposes of the student. According to the Copyright Revisions Act of 1976, as amended [17 U.S.C. Sec. 101 et seq.], students may not copy, duplicate, or distribute the alternative media.

If students are no longer in possession of the eBook or physical copy of the book, they must delete alternative media files from their account(s).

Procedure Steps:

| | Action | Responsible for Implementing |
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| 1. | Students submit a request for alternative media by filling out the Alternative Media Request Form completely and submitting it to ^{HF} CDHP via email at disabilityaccommodations@westernu.edu . The form can be found on the "Services" webpage at https://stagewp.westernu.edu/cdhp/cdhp-services/alternative-media/#accordion-1-button . Incomplete forms may result in delays while the information is being obtained. | Student |
| 2. | Students can submit their additional materials on the Alternative Media Request Form. Students are responsible for providing all materials that are not on the required book list to ^{HF} CDHP for scanning and conversion. Digital files may be emailed to disabilityaccommodations@westernu.edu while physical copies must be brought to the ^{HF} CDHP office during normal business hours. | Student |
| 3. | Students must submit textbooks, digital, and/or printed materials by the date requested by ^{HF} CDHP. Timely submission will ensure faster delivery of alternative media. | Student |
| 4. | ^{HF} CDHP will communicate with students regarding the status of their materials via their WesternU email. Thus, it is important that students waiting for alternative media check their email regularly. | Student/Assistive Technology and Alt Media Specialist & ^{HF} CDHP Staff |
| 5. | It is the student's responsibility to contact ^{HF} CDHP about any changes in their course registration or materials needed. | Student |
| 6. | It is the student's responsibility to contact ^{HF} CDHP if they encounter trouble submitting materials (i.e., instructor has not announced materials, book is out of stock, source is already in electronic format). | Student |
| 7. | Students can submit their receipt(s) as soon as they are available after submitting their request. If there are | Student |

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| | issues securing a receipt, please contact the Assistive Technology and Alternative Media Specialist for assistance. Receipts should be submitted as PDFs, JPEG/PNG image or Word Doc to disabilityaccommodations@westernu.edu and should be labeled with the student's first initial, last name, college and graduation year, and the term the receipt is for. | |
| 8. | Third-party receipts and or/purchases from fellow students will not be accepted as proof of purchase. | Student/Assistive Technology and Alternative Media Specialist/ ^{HF} CDHP Staff |
| 9. | Students enrolled in the College of Dental Medicine or College of Optometry using Vital Source can request a receipt from the WesternU bookstore by emailing them at campusstore@westernu.edu . Submit the copy in the appropriate format to ^{HF} CDHP. | Student |
| 10. | When materials are completed, they will be uploaded to the student's library (Kurzweil 3000) or uploaded and shared through a Google Shared Drive (Speechify, etc.). Students will be notified via email that they have been uploaded. Students receiving Braille will be emailed their materials are ready and may schedule to pick them up from ^{HF} CDHP during normal business hours. | Assistive Technology and Alternative Media Specialist/ ^{HF} CDHP Staff |
| 11. | Books that are listed as rentals, this includes subscriptions, are only available for the duration of the rental/subscription period. | Assistive Technology and Alternative Media Specialist/ ^{HF} CDHP Staff |
| 12. | For materials that are provided through Canvas by the instructor, students will need to download the materials and then upload them into their assigned platform (Kurzweil 3000 or Speechify). Students needing a refresher course on the features of their approved software should contact the Assistive Technology and Alternative Media Specialist via email at disabilityaccommodations@westernu.edu . Materials provided through Adobe Shelf or Red Shelf cannot be downloaded and uploaded into the software ^{HF} CDHP provides; however, they do possess read aloud functions and marking features similar to what is offered. | Student |
| 13. | Any questions or concerns regarding the alternative media accommodation, formats provided, or difficulties accessing provided files should be directed to the Assistive Technology and Alternative Media Specialist at disabilityaccommodations@westernu.edu . | Student |

Definitions:**Major Types of Alternative Media**

Electronic Text (E-Text) such as Microsoft Word or Adobe PDF files, which can be accessed on a computer with screen reading or screen magnification software. E-text can be easily stored, searched, and indexed, and can be converted to large print or Braille. E-texts are either created on campus by scanning the material or are acquired from the publishers, under the provisions of AB 422, which requires publishers to provide E-text to students with disabilities.

Large print documents for those with sufficient vision are often desirable. Although they are somewhat bulky, materials in large print have the advantage of being relatively portable and requiring no special equipment while conveying all the graphic and spatial information contained in the original material.

Braille is a system of reading and writing which is used by approximately 10 percent of blind and visually impaired individuals. Braille can be quickly referenced without any equipment and can include charts, tables, simple diagrams, and a reasonable approximation of the format of a printed document.

Text-to-speech software is a type of assistive technology that reads digital text out loud. It is often used by severely visually impaired or blind individuals to read texts and has been expanded to include individuals with learning and cognitive disabilities, and English language learners. Kurzweil 3000 is one of the text-to-speech softwares that ^{HF}CDHP provides as an option to students and enables the user to make notations and create study guides from assigned reading materials. Speechify is the other option and allows students to have their text read out loud to them.

References, if applicable:

Related Links: [^{HF}CDHP Alternative Media](#); [Introduction to Kurzweil 3000](#); [Learning Speechify Tutorial](#)

Related Forms: [Alternative Media Request Form](#), [Alternative Media Copyright Agreement](#)

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Consuelo Sanchez, Alternative Media & Assistive Technology Consultant

Email: disabilityaccommodations@westernu.edu; csanchez@westernu.edu

Policy reviewed by: (check all that apply)

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|-------------------------|---|----------------------------|------------------------------|
| Academic Senate | X | General Counsel | Provost's Office |
| Biosafety Committee | | Human Resources | Radiation Safety Committee |
| Board of Trustees | | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | | Information Technology | Sponsored Programs |
| Clinic Administration | | Institutional Review Board | X University Risk Management |

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|-------------------------------|--------------------|---|------------------------------|
| Dean's Council | Operations Council | | University Compliance Office |
| Directors of Operations | President's Office | | University Policy Office |
| Environmental Health & Safety | Procurement | X | University Student Affairs |



POLICY

Title: Animals on University Property Policy

Effective Date: 8/17/2024

Applies: University Wide

Statement: All individuals on university property are generally prohibited from bringing animals, including pets, into any buildings or other controlled areas on university property. However, individuals with disabilities are allowed to bring service animals and emotional support animals onto university property as defined and specified within. Refer to the Definitions section for additional requirements. **EXCEPTION:** Individuals bringing their pet(s) to the Pet Health Center for treatment are allowed on campus, subject to compliance with Sections III and IV of this policy.

Purpose: To provide guidance on implementing the rules and regulations concerning employees, affiliates, students, and visitors bringing animals on university property.

I. Related Information:

- A. **Service Animals:** WesternU permits the use of trained service animals and service animals in training assisting people with disabilities (e.g., visitors or others) on its campus in areas open to the public consistent with the provisions of this policy and applicable law.
- B. **Permitted Inquiry:** University faculty and staff are allowed to make the following inquiries to determine whether an animal qualifies as a service animal:
 1. Is the service animal required because of a disability?
 2. What work or task has the animal been trained to perform?
 - a. Admission of a service animal may be denied if:
 - 1) an individual answers "No" to the question: "Is the animal required because of a disability?" or
 - 2) if the individual is unable to describe any work or task that the animal has been trained to perform
 - b. If the individual answers "Yes" to being a service animal and/or describes the work or task that the animal has been trained to perform, staff should offer any appropriate assistance needed with wayfinding, etc.
 - c. Staff should not limit the service animal's access in any way except where specified below.
 - 1) With respect to these inquiries, staff should not ask about the person's disability, require medical documentation, require a special identification card or training documentation for the animal or
 - 2) Ask that the animal demonstrate its ability to perform the work or task.
- C. **Permitted Access:** A service animal is generally permitted to be on university property in any place where the animal's handler is permitted to be, although there are specific locations and activities on university property where all animals are prohibited for health and safety

reasons (e.g., where the animals may be in danger or where their use may compromise the integrity of research/service).

1. These areas may include, but are not limited to, the following (ADA 2010 Revised Requirements, Service Animals: Guidance for Handlers of Service and Therapy Animals, Healthy Pets, Healthy People, CDC):
 - a. Operatory Suites where medical gases are in use, (e.g., the Dental Center, Pet Health Center's OR suite);
 - b. Treatment Rooms in the Foot and Ankle Center;
 - c. Wound Care Center;
 - d. Central Processing Department in the Dental Center;
 - e. Gross Anatomy Labs, including but not limited to the Human and Animal Lab; and
 - f. Research Labs where toxic chemicals or fumes are being used or are present.

II. Service Animals: Members of the campus community and visitors are prohibited from interfering in any way with a service animal or the duties it performs.

- A. Care of a Service Animal during a prolonged procedure: If any campus community member or visitor requires a prolonged procedure at the Pomona, CA, Patient Care Center, information should include discussion for the care of the service animal prior to the procedure appointment. If the procedure is going to take place in a prohibited area, as listed above, the owner must make animal care arrangements. The owner has the option of boarding the animal at the WesternU Pet Health Center (only on the Pomona campus), for a fee.
- B. Students with Service Animals: Students who use service animals are recommended to contact ^{HF}CDHP to register as a student with a disability. Additionally, ^{HF}CDHP may request proof of vaccinations if required by state and local laws.
- C. Service Animal in Training: University staff may not:
 1. Ask an individual about the nature or extent of a disability that the individual has or may have.
 2. Require an individual to provide documentation proving that an animal is a service animal in training; or
 3. Notwithstanding any fee or admission charge imposed for pets, require that a person with a disability or a service animal trainer pay a fee or admission charge for a service animal in training.
- D. A person with a disability or a service animal trainer must maintain control of a service animal or service animal in training. Except as provided in this subsection, control shall be exerted by means of a harness, leash, or other tether. If the use of a harness, leash or other tether would interfere with the ability of the animal to do the work or perform the tasks for which the animal is trained or is being trained, control may be exerted by the effective use of voice commands, signals, or other means. If an animal is not under control as considered in this subsection, the university may consider the animal to be out of control.

III. **Emotional Support Animals:** Emotional support animals are not typically trained to perform specific jobs or tasks.

- A. **Students and Emotional Support Animals:** Federal law requires the reasonable accommodation of an emotional support animal in a university owned residence hall or campus apartment. WesternU does not own residence halls or provide campus housing for students. Consequently, students are generally not permitted to bring emotional support animals on campus or to clinical rotation sites. Students may contact ^{HF}CDHP for additional information.
- B. **Employees and Applicants for Employment and Emotional Support Animals:**
 - 1. Emotional support animals may be designated as a reasonable accommodation for a documented disability.
 - 2. The accommodation must be arranged through Human Resources (HR) prior to bringing the animal onto university property.
 - 3. These determinations are done on a case-by-case basis, and in accordance with applicable laws and regulations.
 - 4. Employees should contact HR to obtain additional information regarding the criteria.
 - 5. Prior to allowing an employee to have an emotional support animal, HR may require a letter from the employee's health care provider stating that the employee has a disability and explaining why the animal is necessary as an accommodation to allow the employee to perform the essential job functions and may require confirmation that the animal meets the minimum standards as defined by applicable law.
- C. **Inquiries regarding Employees, Applicants for Employment with an Emotional Support Animal:** If an individual is unsure why an employee has an animal on campus, they may confirm with HR that this is an accommodation.

IV. **Responsibilities of Handlers:** The University is not responsible for the care, food, or supervision of a service animal or an emotional support animal. While on university property, a service animal or an emotional support animal determined to be a reasonable accommodation must be under the full personal control of their handler at all times and subject to the following:

- A. Animals may not be left unattended at any time on university property. Note, a patient or visitor who uses a service animal need not personally care for the animal and may designate a family member or friend to care for the animal. However, that designated individual will be held to the provisions within in their handling of the service animal.
- B. **Service Animals:** WesternU permits the use of trained service animals and service animals in training assisting people with disabilities (e.g., visitors or others) on its campus in areas open to the public consistent with the provisions of this policy and applicable law.
- C. **Permitted Inquiry:** University faculty and staff are allowed to make the following inquiries to determine whether an animal qualifies as a service animal:
 - 1. Is the service animal required because of a disability?
 - 2. What work or task has the animal been trained to perform?

- D. Animals must be accompanied by the owner or the owner's designated responsible party at all times.
 - E. Animals are not allowed to walk freely on university property.
 - F. Animals may not be tied or tethered to any university property, including but not limited to buildings, railing, bike racks, fire hydrants, signposts, benches, and trees, and may not run loose anywhere on campus.
 - G. Handlers must use designated areas on campus for waste relief and exercise of animals, as appropriate.
 - H. Handlers are responsible for the immediate cleanup and proper disposal of any waste created by the animal. If the handler fails to clean up after the animal or the animal causes damage to the property, the handler may be prohibited from bringing the animal onto university property. See Removal of Service or Emotional Support Animals below.
 - I. Handlers must comply with all applicable laws and regulations for the presence of animals in public places as mandated by state or local ordinances (e.g., vaccination, licensure, animal health and leash laws).
 - J. Handlers are responsible for educating others in the campus community on how to appropriately interact with the animal.
 - K. Individuals with disabilities may be responsible for any damage caused by their animals and must take appropriate precautions to prevent property damage and injury.
 - L. Damages may include but are not limited to fees for clean-up and disposal of animal waste or replacement and repair of university or other individuals' assets, including grounds, personal property, and improvements.
 - M. Animals must not be allowed to disrupt or interfere with university activities including but not limited to teaching research, service, or administrative activities. Exception: If the service animal needs to be intentionally disruptive as part of their function (e.g., A service dog that barks in a classroom to alert its owner to medical issues) will not be deemed sufficiently "disruptive" to exclude the animal as a fundamental alteration, if comparable noise from a person would be tolerated.
 - N. If the animal is unruly or disruptive (e.g., not well behaved, housebroken, barking, allowed to wander in a classroom, etc.) or if the handler fails to maintain control of the animal, the handler must regain control immediately or remove the animal from university property. If the improper behavior continues or happens more than once, the handler may be prohibited from bringing the animal on university property to be determined on a case-by-case basis by ^{HF}CDHP. See Removal of Service or Emotional Support Animals below.
- V. Removal of a Service or Emotional Support Animal: The University may require an individual to remove a service animal, or an emotional support animal determined to be a reasonable accommodation from university property on an individualized basis and generally when one of the following conditions exist:
- A. The animal is disruptive and not effectively controlled.
 - B. The animal is not housebroken.

- C. The animal's presence, behavior or actions pose an unreasonable or direct threat to property and/or health and safety of others; and/or
- D. When the presence of the service animal would fundamentally alter the program, benefit, service, etc.
 - 1. In the event that the animal is being considered for removal and/or immediately removed or banned from campus (e.g., generally when there is an immediate health and safety concern), the University will engage in a good faith process, through ^{HF}CDHP, with the individual to determine if other accommodations will effectively allow the individual to participate in the program, service, or activity.
 - 2. In rare circumstances (e.g., direct threat or health and safety concerns), the University may have to initiate the separation of an animal from its owner, based on the above. Staff must report the incident promptly to a supervisor and complete the online Incident Report. The supervisor will then notify the University's Risk Management Department.

Note: Any employee or student who brings an animal on campus and whose presence on campus is not in accordance with this policy may receive a directive from ^{HF}CDHP requiring the immediate removal of the animal from the campus and/or ban of the animals' presence on campus. Failure to adhere to such a directive may result in disciplinary action and/or sanctions.

VI. Staff Etiquette towards Service and Emotional Support Animals: Faculty, staff, students, visitors, and members of the general public should avoid doing the following:

- A. Petting an animal when you have not received permission to do so.
- B. Feeding an animal.
- C. Deliberately startling an animal, and
- D. Separating or attempting to separate an owner from their animal.

VII. Pet Therapy Animal Events: WesternU allows uses of pet therapy animals and handler teams at certain University events in accordance with the following requirements:

- A. Current registration with a recognized national Pet Therapy organization, (e.g., TDI) and ability to present on demand (and possible in advance) current proof of training of the animal(s), credentials of the handler and registration. If any of this documentation does not meet this criteria, the animal and its handler can be prohibited from coming on campus while providing therapeutic services.
- B. During the event the animal wears visual identification, (e.g., vest, ID badge).
- C. Animal and handler have been invited to a University sanctioned event.
- D. The team is accompanied by a designated WesternU employee.
- E. Authorization to enter specific locations within campus buildings including dates, times, and specific rooms, may be required prior to the animal/handler team's arrival.
- F. Compliance with Animals on Campus Policies and Procedures as applicable.
- G. Animals cannot be taken to offices or classrooms if they are no longer "working" at a university sanctioned event.

- H. The University is not responsible for the care, food, or supervision of any pet therapy animals utilized in approved events. Pet therapy handler(s) and/or team is expected to maintain full control over the animals and incur/cover any resulting liability and/or damage caused by such animals. Note: Any other desired use of a pet therapy animal must be permitted through ^{HF}CDHP prior to the animal being on campus. See Emotional Support Animals above.
- VIII. Appeals or Grievances: Any individual who feels that they have been unfairly denied the ability to bring a service animal onto university property, or who feels that they have been unfairly denied the ability to have an emotional support animal in the workplace may file a grievance. Students may file a grievance with ^{HF}CDHP. The grievance procedure can be found at <https://www.westernu.edu/cdhp/grievanceprocedures/>. All others should file a grievance with the Title IX office (<https://westernu.guardianconduct.com/student-portal/new-report>).
- IX. Individual Objections to the Presence of Service or Emotional Support Animals:
- A. Employees or students who possess an objection to the presence of a service or emotional support animal should contact ^{HF}CDHP to discuss their concerns. Objections could be based on conflicting health conditions (e.g., respiratory diseases, asthma, or severe allergies), religious grounds, phobias, or other psychological problems with animals. ^{HF}CDHP will work to reasonably accommodate individuals with a legitimate ground for objection to ensure that both individuals are adequately accommodated, as appropriate.
 - B. Visitors or others who possess an objection to the presence of a service or emotional support animal during their time on campus should notify Campus Security to discuss their concerns. Staff will take reasonable steps to address the concerns while also ensuring that all reasonable modifications are made without regard to disability, such that handlers aren't disproportionately asked to relocate. Staff is expected to follow standard infection prevention and control as well as environmental surface cleaning procedures following visitation by a service animal.
- X. Exclusions: This policy does not apply to animals used in classes on campus, based on requests by faculty for such use. Non-research animals used in classes require prior permission from the academic unit head, Dean, and Risk Management.
- A. This policy does not apply to animals used in police or search and rescue operations on university property.
 - B. This policy does not apply to animals trained for and used in a clinical therapeutic setting on campus, such as through the on-campus EAP counselors.
 - C. This policy does not apply to animals used in approved university research.
- XI. Reporting Potential Violations by Employees or Students:
- A. Potential violations of this policy may be reported to ^{HF}CDHP.

- B. A report of a potential violation may result in a directive from ^{HF}CDHP requiring the immediate removal of the animal from the campus and/or ban of the animals' presence on campus during the assessment of the report.
- C. Any employee or student determined to have violated this policy, including any ^{HF}CDHP directives, may be subject to discipline and/or sanctions, in accordance with University policies and procedures.

Definitions:

Emotional Support Animals: This term refers to animals who are not considered service animals under the ADA. These animals include but are not limited to animals referred to as emotional support animals, therapy animals, or comfort animals. This animal provides comfort or support for a person with a disability but does not have any individualized training to perform work or tasks.

Handler: A person with a disability who is the owner and user of a service animal or emotional support animal, or the owner or person bringing an animal onto university property.

Pet: Any animal that is not trained or employed as a service animal or emotional support animal by the handler.

Pet Therapy Animals: A Pet Therapy Animal and Handler Teams are used to achieve specific physical, social, cognitive, and emotional goals with those undergoing this form of therapy. The animal and its handler have had extensive training and completed certification requirements by a national organization such as Therapy Dogs International (TDI).

Pet Therapy Animal Handler: An individual that is trained to accompany and control the animal during the therapy sessions.

Service Animal: A dog, and in some specific instances a miniature horse, individually trained to do work or perform tasks for the benefit of and to accommodate the functional needs of an individual with a disability (includes guide, signal, and psychiatric service animals). These disabilities include physical, sensory, psychiatric, intellectual, or other mental disabilities. Service animals are working animals and not considered pets. This includes an animal that is in training to become a service animal. Animals whose sole function is to provide comfort or emotional support do not qualify as service animals. The work or task that the animal performs must be directly related to the individual's disability. Examples of such tasks include, but are not limited to, assisting those with low vision or total blindness in navigation; alerting individuals who are deaf or hard of hearing to the presence of people or objects; pulling a wheelchair or stabilizing a person's gait; retrieving items such as medicine or the telephone; recognizing and assisting during seizures; alerting individuals who may be experiencing flashbacks of emotional trauma; or providing stability for mobility purposes. In rare circumstances, a miniature horse may serve as a service animal and will be handled on a case-by-case basis in accordance with criteria outlined under applicable laws and/or regulations.

University Property: For the purposes of this policy, university property includes all areas owned or controlled by the university, all work sites for university employees, all class sites for students, all event sites for university events, and all other venues in which the university controls the site.

Regulatory Information:

- AAVMC Guidelines for Service Animal Access to Veterinary Teaching Facilities, August 2, 2019
- Americans with Disabilities Act (“ADA”) governs the use of service animals by individuals with disabilities. See 42 U.S.C. § 12.101, et. seq.; 28 C.F.R. Part 35, §§35.104, 35.136, See in particular: 28 C.F.R. Part36 §36. 101, 361.04 & 28 C.F.R. § 36.208.
- Americans with Disabilities Act: Service Animal https://www.ada.gov/service_animals_2010
- The California Department of Fair Housing and Employment regulations govern the use of assistive animals by individuals with disabilities in the workplace.
- Centers for Disease Control and Prevention: Guidelines for Environmental Infection Control in Health-Care Facilities, 2003.
- CA: (c) Visually impaired or blind persons and persons licensed to train guide dogs for individuals who are visually impaired or blind pursuant to Chapter 9.5 (commencing with Section 7200) of Division 3 of the Business and Professions Code, or guide dogs as defined in the regulations implementing Title III of the Americans with Disabilities Act of 1990 (Public Law 101-336), and persons who are deaf or hard of hearing and persons authorized to train signal dogs for individuals who are deaf or hard of hearing, and other individuals with a disability and persons authorized to train service animals for individuals with a disability, may take dogs, for the purpose of training them as guide dogs, signal dogs, or service animals in any of the place specified in subdivisions (a) and (b). These persons shall ensure that the dog is on a leash and tag issued by the county clerk, animal control department, or other agency, as authorized by Chapter 3.5 (commencing with Section 30850) of Division 14 of the Food and Agricultural Code. In addition, the person shall be liable for any provable damage done to the premises or facilities by his or her dog.
- OR: A place of public accommodation or of access to state government services, programs or activities may not:
 - a) Ask an individual about the nature or extent of a disability that the individual has or may have;
 - b) Require an individual to provide documentation proving that an animal is an assistance animal or an assistance animal trainee; or
 - c) Notwithstanding any fee or admission charge imposed for pets, require that a person with a disability or an assistance animal trainer pay a fee or admission charge for an assistance animal or assistance animal trainee.

Related Procedure: N/A

Related Links: [Service – Emotional Support Animals](#)

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

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| Academic Senate | X | General Counsel | Provost's Office |
| Biosafety Committee | | Human Resources | Radiation Safety Committee |
| Board of Trustees | | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | | Information Technology | Sponsored Programs |
| Clinic Administration | | Institutional Review Board | X University Risk Management |
| Dean's Council | | Operations Council | University Compliance Office |
| Directors of Operations | | President's Office | University Policy Office |
| Environmental Health & Safety | | Procurement | X University Student Affairs |



PROCEDURE

Title: Exam Proctoring Procedures

Effective Date: 11/20/2023

Applies to: All Students Enrolled at the Harris Family Center for Disability and Health Policy (^{HF}CDHP) with Exam Accommodations

Statement: Providing alternative testing is a collaborative effort between ^{HF}CDHP and the program. ^{HF}CDHP provides proctoring of exams for students with documented disabilities. The proctoring service is designed to ensure that appropriate accommodations are provided and to assist the faculty in administering required examinations and quizzes. Faculty are not required to utilize ^{HF}CDHP's services as long as the necessary accommodations are provided.

Purpose: The purpose of this procedure is to clarify the roles of students, ^{HF}CDHP staff, and proctors in arranging for and proctoring exams.

Related Information: Provision of Academic Accommodation(s) Policy

Procedure Steps: On Campus – In person

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| 1. | ^{HF} CDHP will obtain student(s) quiz/exam schedule from their college. | ^{HF} CDHP Staff |
| 2. | Students are responsible for notifying ^{HF} CDHP staff and their College Accommodation Liaison (CAL) by email at least 3 business days prior to the scheduled quiz/exam if they choose not to take it at ^{HF} CDHP. | Student |
| 3. | ^{HF} CDHP staff will email an Exam Notice containing the date, time, location, allowed testing materials, and the proctor's name to the student and their CAL by the end of the business day prior to the scheduled quiz/exam. If a student notices an error on the Exam Notice, the student must notify the college and ^{HF} CDHP immediately. | ^{HF} CDHP Staff/Student |
| 4. | Student's quizzes/exams will be scheduled on the same date and as close to the class quiz/exam time as possible. Note: Schedule is subject to change. Students are advised to check their WesternU email the morning of the quiz/exam. | ^{HF} CDHP Staff/Student |
| 5. | Students must present their WesternU badge to the proctor to check in for the quiz/exam. | Student |
| 6. | Students who arrive late for a quiz/exam will need to end at the scheduled time indicated on the Exam Notice | Student/ ^{HF} CDHP Staff |

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| | email. No additional time will be granted. Students will be considered late if they are not in their assigned testing room five (5) minutes prior to the scheduled quiz/exam start time. All late arrivals are reported to the appropriate CAL. | |
| 7. | Students are required to download their quiz/exam prior to arriving at the designated testing location. Students must arrive 15 minutes prior to a scheduled quiz/exam start time. | Student |
| 8. | Students are only allowed the following items during a quiz/exam: laptop (depending on format of exam), pen, pencil, eraser, any test specific materials approved by the college, and any items approved as an accommodation by ^{HF} CDHP. | Student |
| 9. | Screen protectors/privacy screens must be removed before testing. The proctor must have an unobstructed view of the exam screen. | Student |
| 10. | Students are permitted to bring a light snack. Snacks must be in the original wrapping or in a clear container. Beverages and medication should be in a clear container. All items are subject to inspection. | Student |
| 11. | Lockers will be provided for students testing on the Pomona campus at ^{HF} CDHP, Building 390 to store their personal belongings. Students must store all unapproved testing materials in the locker. Cell phones must be on silent prior to placing them in the locker. The key must be returned to the proctor at the end of the examination. Students are responsible for wiping down their locker after use. | ^{HF} CDHP Staff/Student |
| 12. | Students may not access their locker/backpack or personal belongings without the accompaniment of the proctor once a student has been cleared by the proctor to enter the exam room. | Students/ ^{HF} CDHP Staff |
| 13. | Students will be provided ear plugs or noise canceling headphones upon request. Students are advised that supplies are limited. | ^{HF} CDHP Staff |
| 14. | Before entering the exam room, students are responsible for reviewing and confirming that all information on the Proctor Form is correct and they have initialed the marked areas on the form. If there is a | Student |

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| | discrepancy, the student must notify the proctor immediately. | |
| 15. | Cameras will be placed in all rooms designated for testing within ^{HF} CDHP, Building 390, for viewing and recording. Once the quiz/exam begins, students must remain in the camera's view. | Student |
| 16. | Students are not permitted to navigate outside of their exam software unless approved by their college and ^{HF} CDHP is notified. | Student |
| 17. | Students must inform the proctor when a restroom break is needed. The proctor will note the start and end time of the restroom break on the Exam Proctoring Form. Only one student may be in the restroom at a time. | Student/ ^{HF} CDHP Staff |
| 18. | Students are not allowed to leave the building in which the testing is taking place until they have completed their quiz/exam and have been cleared by the proctor to depart. In the event of an emergency, the proctor will guide students out of the building to the designated WesternU safety location. | Student |
| 19. | If a student has a question related to the quiz/exam, the proctor will contact the CAL for clarification. | Student/ ^{HF} CDHP Staff |
| 20. | Upon completion of the quiz/exam, students are responsible for: <ul style="list-style-type: none"> • Placing furniture in its original location (i.e., lower table, push in chair, etc.) • Exiting the room quietly and checking out with the proctor. • Showing the Green Screen to the proctor who will verify quiz/exam is complete and collect all testing materials provided by the college. | Student |
| 21. | Students must follow WesternU's Standards of Student Conduct. ^{HF} CDHP staff will report all incidents in which academic integrity may have been compromised to the student's College. | Student/ ^{HF} CDHP Staff |

Procedure Steps: Online - Zoom

| | Action | Responsible for Implementing |
|----|--|------------------------------|
| 1. | ^{HF} CDHP will obtain student(s) quiz/exam schedule from their college. | ^{HF} CDHP Staff |

| | | |
|-----|--|-----------------------------------|
| 2. | ^{HF} CDHP staff will email an Exam Notice with the date, time, Zoom link, allowed testing materials, and proctor name to the student and the CAL by the end of the business day prior to a scheduled quiz/exam. If the student notices an error on the Exam Notice, the student must notify the college and ^{HF} CDHP immediately. | ^{HF} CDHP Staff/Student |
| 3. | Students should be prepared before the start of the quiz/exam. Testing device and proctoring device should be fully charged, near an outlet, with the charging cable or external charger. | Student |
| 4. | Students should secure a quiet testing location with good internet access. Students should be the only person in the selected testing space. | Student |
| 5. | Students must cover all additional monitors and close applications, except Zoom, on the proctoring device. Students are not permitted to navigate outside of their exam software unless approved by their college and ^{HF} CDHP is notified. | Student |
| 6. | Students must clear their testing surface of all non-approved testing materials. | Student |
| 7. | Students should position the proctoring device in a manner that the proctor can see the student's face, both hands, keyboard, and approved testing materials. | Student |
| 8. | Students may use ear plugs (foam) for noise reduction. The proctor will review and approve prior to the student commencing the quiz/exam. No ear buds or headphones will be permitted. | Student/ ^{HF} CDHP Staff |
| 9. | Screen protectors must be removed before testing. The proctor must have an unobstructed view of the exam screen. | Student |
| 10. | Students should sign into Zoom at least 15 minutes prior to the testing time noted on the Exam Notice to allow the proctor time to verify their identity and scan the student's testing space and approved testing materials. | Student/ ^{HF} CDHP Staff |
| 11. | Students must message the proctor privately through the chat feature and drop a picture of their Student ID. | Student/ ^{HF} CDHP Staff |
| 12. | Students wishing to preserve their identity from other testers may change the name in their Zoom tile to their Student ID. | Students |

| | | |
|-----|--|-----------------------------------|
| 13. | The proctor will provide the quiz/exam password to the student before starting quiz/exam. | ^{HF} CDHP Staff |
| 14. | Once the quiz/exam begins, students and the proctor will mute their microphone and use the chat feature to communicate throughout the testing process. | Student/ ^{HF} CDHP Staff |
| 15. | Once the quiz/exam begins, students should minimize looking around and focusing on objects/items that are not approved testing materials. | Student |
| 16. | Students must inform the proctor when a restroom break is needed. The proctor will note the start and end time of the restroom break on the Exam Proctoring Form. | Student |
| 17. | Upon completion of the quiz/exam, students are responsible for: <ul style="list-style-type: none"> • Notifying the proctor of completion using the chat feature. • Showing the Green Screen to the proctor, who will verify the quiz/exam is complete. • Shredding scratch paper or clearing the whiteboard and presenting it to the proctor (if applicable). | Student/ ^{HF} CDHP Staff |
| 18. | Students must follow WesternU's Standards of Student Conduct. ^{HF} CDHP staff will report all incidents in which academic integrity may have been compromised to the student's College. | Student/ ^{HF} CDHP Staff |

Definitions/Acronyms:

ADA – Americans with Disabilities Act of 1990

ADAAA – Americans with Disabilities Act Amendments Act of 2008

^{HF}CDHP – Harris Family Center for Disability and Health Policy

WesternU – Western University of Health Sciences

Regulatory Information: Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990; ADA Amendments Act of 2008, and applicable California and Oregon state law

References, if applicable:

Related Policy: Provision of Accommodation(s)

Related Links: [^{HF}CDHP Webpage Exam Accommodations](#), Provision of Accommodation(s) Policy

Related Forms: [Student Exam Day Policy and Procedures](#), Proctor Form

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Marcelle Daniels, Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

| | | |
|-------------------------------|----------------------------|------------------------------|
| Academic Senate | General Counsel | Provost's Office |
| Biosafety Committee | Human Resources | Radiation Safety Committee |
| Board of Trustees | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | Information Technology | Sponsored Programs |
| Clinic Administration | Institutional Review Board | X University Risk Management |
| Dean's Council | Operations Council | University Compliance Office |
| Directors of Operations | President's Office | University Policy Office |
| Environmental Health & Safety | Procurement | X University Student Affairs |



PROCEDURE

Title: Extended Time on Assignments

Effective Date: 3/20/2024

Applies to: All Students Enrolled at ^{HF}CDHP with Extended Time on Assignments as an Approved Accommodation

Statement: Some disabilities impact a student's ability to complete assignments. In cases such as these, flexibility in assignment due dates may be considered an appropriate accommodation. The student must request this accommodation through ^{HF}CDHP. All accommodation requests are considered on an individual basis.

Purpose: To establish a ^{HF}CDHP-approved agreement between the student and faculty to clarify expectations regarding extension of assignment due dates.

Related Information: Provision of Academic Accommodation(s) Policy, Faculty Guidelines for Extended Time on Assignments

Procedure Steps:

| | Action | Responsible for Implementing |
|----|--|---|
| 1. | Once ^{HF} CDHP's Associate Director, Director, or Disability Specialist (i.e., designated counselor) approves a student for extended time on assignments, ^{HF} CDHP will notify the designated College Accommodation Liaison (CAL) by emailing the student's accommodation memorandum which lists the accommodations for which the student is eligible. | ^{HF} CDHP Staff |
| 2. | The student's designated counselor will complete the types of assignments and environment sections, electronically sign, and date the Extended Assignment Deadlines Agreement, which will be forwarded to the designated ^{HF} CDHP staff member for processing. | ^{HF} CDHP Counselor/ ^{HF} CDHP Staff (Office Coordinator/ Admin. Asst. I) |
| 3. | The designated ^{HF} CDHP staff member will send the Extension of Assignment Deadlines Agreement to the student through DocuSign to complete the top portion, electronically sign, and date the agreement. | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |
| 4. | The student must check the box that they have read and agree to six stated responsibilities, which include: <ul style="list-style-type: none"> It is the student's responsibility to participate in the discussion of extension of assignment deadlines with ^{HF}CDHP and their instructor and submit the signed agreement to ^{HF}CDHP within five (5) business days, after the first class | Student |

| | | |
|----|--|--|
| | <p>session or following the determination of eligibility for the accommodation. Exceptions will be handled on a case-by-case basis.</p> <ul style="list-style-type: none"> • It is the students responsibility to ensure that the form is filled out completely and correctly. The lack of any pertinent information may impact ^{HF}CDHP's ability to ensure the provision of accommodation. • The student attests that they understand that extension of assignments pertains only to the type of assignments approved by ^{HF}CDHP. • It is the student's responsibility to adhere to, and complete work within the agreed upon alternate timeframe. • The student attests that eligibility for extension of assignment deadlines does not guarantee due date extensions for all assignments, given that such extensions may fundamentally alter a course's essential requirements. • The student authorizes ^{HF}CDHP to release information related to their accommodation for coordination of extension of assignment deadlines. Such persons may include faculty, department staff, and ^{HF}CDHP staff. | |
| 5. | ^{HF} CDHP will not move forward with processing the request until the student's signed agreement is received. | ^{HF} CDHP Staff |
| 6. | <p>The designated ^{HF}CDHP staff member will email the CAL a notification requesting the student's course numbers and faculty names as follows:</p> <p>Dear [Insert Name of CAL]:</p> <p>I am emailing you on behalf of ^{HF}CDHP, regarding [Insert Name of Student] who has an approved academic accommodation for Extended Assignment Deadlines. Please email the names and course numbers for all applicable faculty members that ^{HF}CDHP will need to connect with to disabilityaccommodations@westernu.edu so that we can send them the guidelines and agreement form. Please let me know if you have any questions.</p> <p>Kind regards,</p> | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |
| 7. | The designated ^{HF} CDHP staff member will follow up via email regarding course numbers and faculty information at the following intervals: | ^{HF} CDHP Staff (Office Coordinator) |

| | | |
|-----|--|--|
| | <ul style="list-style-type: none"> • Email CAL within 2 business days if course and faculty information has not been received. • Email/phone call to Vice/Associate Dean within 3 business days if course and faculty information has not been received. • If no response is received at 4 business days, the designated ^{HF}CDHP staff member will advise the student's counselor who will email/phone the Dean. | |
| 8. | Upon receipt of course numbers and faculty information and the agreement signed by the student, the designated ^{HF} CDHP staff member will contact faculty via DocuSign and send the designated email template, Extension of Assignment Deadlines Agreement, and Faculty Guidelines to them to complete the agreement. Faculty will be advised that any questions should be directed to ^{HF} CDHP (909)469-5441 or disabilityaccommodations@westernu.edu . Faculty should complete and submit the agreement to ^{HF} CDHP within 3 business days. | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |
| 9. | Once ^{HF} CDHP receives the faculty-completed agreement, the student's assigned counselor will review it to ensure reasonable accommodation is met and forward it to the designated ^{HF} CDHP staff member to send it to the student through DocuSign to initial. | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |
| 10. | Should the student have concerns or questions regarding the faculty/ ^{HF} CDHP-completed agreement, ^{HF} CDHP will resolve these issues through an interactive discussion between the parties (i.e., faculty, student, ^{HF} CDHP counselor). | ^{HF} CDHP Counselor |
| 11. | Once finalized or the student does not raise concerns, it will be considered active in three (3) business days. Faculty are not expected to provide retroactive accommodation. | Faculty |
| 12. | Students are responsible for completing course work by the extended date and should be held to the same standard as all other students for work submitted late (after extended due date). | Student |
| 13. | ^{HF} CDHP will maintain a copy of the finalized agreement in the student's file. | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |

| | | |
|-----|--|--|
| 14. | If the accommodation is approved through the duration the of program, the designated ^{HF} CDHP staff member will email the CAL one month before the start of each term. | ^{HF} CDHP Staff (Office Coordinator/Admin. Asst. I) |
|-----|--|--|

Definitions/Acronyms:

ADA – Americans with Disabilities Act of 1990

ADAAA – Americans with Disabilities Act Amendments Act of 2008

^{HF}CDHP – Harris Family Center for Disability and Health Policy

WesternU – Western University of Health Sciences

Regulatory Information: Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990; ADA Amendments Act of 2008, and California and Oregon state law

References, if applicable:

Related Policy: Provision of Accommodation(s), Faculty Guidelines for Extended Time on Assignments

Related Links: [^{HF}CDHP Webpage](#), [Provision of Accommodation\(s\) Policy](#)

Related Forms: Extension of Assignment Deadlines Agreement

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Marcelle Daniels, Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

| | | |
|-------------------------------|----------------------------|------------------------------|
| Academic Senate | General Counsel | Provost's Office |
| Biosafety Committee | Human Resources | Radiation Safety Committee |
| Board of Trustees | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | Information Technology | Sponsored Programs |
| Clinic Administration | Institutional Review Board | X University Risk Management |
| Dean's Council | Operations Council | University Compliance Office |
| Directors of Operations | President's Office | University Policy Office |
| Environmental Health & Safety | Procurement | X University Student Affairs |



Faculty Guidelines for Extended Time on Assignments

Accommodation:

Students may be determined eligible for the accommodation of extended time on assignments on a case-by-case basis under the following concurrent conditions: 1) The narrative description of substantial limitations to major life activities, and current functional limitation relating to academic performance provided through the interactive process and disability verification documentation indicate a need for such accommodation, and 2) discussion between ^{HF}CDHP and the faculty finds that the provision for extended time on a given assignment will not fundamentally alter an essential course requirement.

These guidelines are informed by the following Office for Civil Rights (OCR) letters:

- **Tulsa Community College – Metro Campus, No. 0792064 (OCR 07/22/11)**¹: Prior to entering into a resolution agreement with the OCR, the College's office of disability services maintained a policy of summarily rejecting extended time on assignments as an accommodation on the grounds that "the role of postsecondary institutions is to prepare students for real-life vocations where time extensions would not likely be allowed."

The OCR found that the College's denial of extended time for assignments was not based on a determination that the complainant failed to provide adequate documentation showing that he was a qualified student with a disability or that his request for additional time to complete assignments was not related to his disability. In addition, there is no indication that the College made an individualized determination that the academic adjustment the complainant requested would eliminate or lower essential requirements or result in a fundamental alteration of the academic program (p. 8).

The OCR determined that the College's summary rejection of extended time on out-of-class assignments violated the student's rights under federal disability laws and regulations.

- **Bowling Green State University, No. 05982143 (OCR 8/31/99)**²: In investigating a complaint that the University denied a student's request for accommodations, including additional time (one extra day) to write reports," the OCR outlined the elements of an essential requirements analysis as including the following:

¹ http://dspssolutions.org/media/259379/tulsa_community_college_ocr_letter.pdf

² <http://www.southwestada.org/html/topical/FAPSI/OCR/bowlinggreen.html>

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- a. The decision is made by a group of people who are trained, knowledgeable, and experienced in the area;
- b. The decision makers consider a series of alternatives as essential requirements;
- c. The decision should be a careful, thoughtful, and rational review of the academic program and its requirements;
- d. Carefully consider whether appropriate alternatives are available, including a consideration of feasibility and cost;
- e. Determine if the essential requirement in question cannot be modified for a specific disabled student; and,
- f. Ensure that the determination is not based only on the past tradition of the institution, such as an assertion that we have "always" done this or required this, without a valid basis for the determination.

The requested modifications should not lower academic standards or require substantial alteration of the program. A requirement may be essential, but the institution should consider if a disabled student could meet the essential aspects of the requirement with modifications or academic adjustments. The institution should focus on the underlying reason for the requirement and whether an appropriate alternative is available that meets the underlying reason for the requirement (p.7).

Regarding report writing accommodations, the University argued, and the OCR concurred, that time for completing reports was an essential requirement in some settings, while not an essential requirement in others. In its settlement agreement, the University indicated that it would implement an essential requirements analysis, whereby:

If the University determines that the time for completing reports for that clinical setting is an essential requirement, the University will provide the OCR with a report documenting the process for the decision and explaining the determination. If the University determines that the time for completing reports for the clinical setting is not an essential requirement, the University will provide the student with effective academic adjustments for his disability unless the academic adjustment would constitute a fundamental alteration of the program or an undue burden (p. 11).

- **Finlandia University, No. 15142914 (OCR 5/30/14)³:** Prior to entering into a resolution agreement with the OCR, the University's office of disability services provided an accommodation "Extended time on assignments: The student is entitled to extended time up to one week if necessary."

³ <http://www2.ed.gov/about/offices/list/ocr/docs/investigations/more/15142014-b.pdf>

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Per the resolution agreement, the University agreed to delete language referencing a one-week time limit for the accommodation from its policies and procedures "to ensure that students with disabilities are provided the academic adjustments that they require because of their disability and are not limited by arbitrary rules (p. 3).

- **Laney College, No. 09122317 (OCR 2/18/14)**⁴: In investigating a student's complaint that faculty had not provided accommodations approved by the College's office of disability services, including "Extended time on written assignments (generally one extra class session)," the OCR found that the student's "failure to timely submit the class project was not the result of the complainant not receiving the accommodation, but instead, was the result of the complainant's suspension from school which was unrelated to her disability" (p. 7). However, even while dismissing the specific complaint regarding extended time on written assignments, the OCR suggested that the totality of the student's allegations were related to a lack of clearly stated and accessible procedures on the part of the College, stating:

The College needs a more robust Section 504 plan that clearly spells out, and provides notice to students, of the (office of disability services) process for how to request accommodations, how the College will coordinate with faculty to implement approved accommodations, how students can challenge or appeal the College's decisions regarding accommodations, and how the College will resolve concerns about whether an accommodation would result in a fundamental alteration of a course content (p. 8).

Additionally, as several of the student's accommodations were characterized by the office of disability services as subject to "instructor approval," OCR offered the following recommendation:

OCR strongly cautions the College against continuing this practice of approving accommodations subject to instructor approval. It is (the office of disability services') function to approve accommodations with certainty, based on documentation provided by the student... OCR notes that instructors may not unilaterally decide to not provide an approved accommodation because they believe the student does not need it or that it would result in a fundamental alteration of essential course content. The College should have procedures in place for how instructors can raise concerns about an approved accommodation and how it will address the instructors' concerns (p. 7).

⁴ <http://www2.ed.gov/about/offices/list/ocr/docs/investigations/more/15142014-b.pdf>

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Process to Complete Form

Based on the above OCR letters and review of procedures adopted by other institutions⁶, extended time on out-of-class writing assignments is an accommodation provided by HFCDHP on a case-by-case basis through a deliberative process that includes the following procedures:

- a. Students eligible for extended time on assignments submit a completed Extension of Assignment Deadlines Agreement Form (see Addendum) within 5 working days of first class or after determination of eligibility.
- b. In the event that the student, faculty, and HFCDHP are unable to complete the Extension of Assignment Deadlines Agreement form, HFCDHP will contact the student's instructor to determine the maximum extension that can be given without fundamentally altering an essential requirement of the course.
- c. If it is determined that extending assignment deadlines fundamentally alters an essential course requirement, the faculty group, including the student's instructor, and department chair, will document and provide a summary of such determination to HFCDHP within five (5) working days of initial contact from HFCDHP.
- d. HFCDHP cannot proscribe a set number of days for the extension for two reasons: 1) "to ensure that students with disabilities are provided the academic adjustments that they require because of their disability and are not limited by arbitrary rules" and 2) the fundamental building blocks of the curriculum and the assignment. Considering this, one assignment could potentially have a weeks' extension, while another could have four hours.

⁶ See Oregon State University, <http://ds.oregonstate.edu/files/documents/assignmentpolicy.pdf>

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Harris
Family
cdhp
Center for Disability
and Health Policy

Extension of Assignment Deadlines Agreement Form

Name: _____ Term: _____ Year: 20 _____

College & Year: _____ Email: _____@westernu.edu

Phone: _____ Check One: Home Work Cell

1. It is **MY** responsibility to participate in the discussion of extension of assignment deadlines with ^{HF}CDHP and my instructor and submit this request to ^{HF}CDHP within five (5) business days after the first-class session or following the determination of eligibility for this accommodation. Exceptions will be handled on a case-by-case basis.
2. It is **MY** responsibility to ensure that this form is filled out completely and correctly. The lack of any pertinent information may impact ^{HF}CDHP's ability to ensure the provision of accommodation.
3. I **understand** that extension of assignments pertains only to the type of assignments approved by ^{HF}CDHP.
4. It's **MY** responsibility to adhere to, and complete work within the agreed upon alternate timeframe.
5. I **am aware** that eligibility for extension of assignment deadlines does not guarantee due date extensions for all assignments, given that such extensions may fundamentally alter a course's essential requirements.
6. I **am aware** I am authorizing ^{HF}CDHP to release information related to my accommodation for coordination of extension of assignment deadlines. Such persons may include faculty, department staff, and ^{HF}CDHP staff.

I have read and agree to the above responsibilities and statements.

Student Signature: _____ Date: _____

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TO BE COMPLETED BY HFCDHP STAFF:

Types of Assignments

- All Assignments Out of Classroom Writing Assignments Other Assignments

Specify: _____

Environment

- Didactic Lab Clinical Rotations

HFCDHP Staff Signature: _____ Date: _____

TO BE COMPLETED BY INSTRUCTOR GIVING THE ASSIGNMENT:

Course Name: _____

If assignment deadlines are **extended**, please fill out the table below for relevant assignments. If additional lines are needed, please use the additional assignment sheet:

1. I verify that the original and alternate due dates below are correct. _____ Instructor or Course Lead Initials

| Assignment Title | Original Due Dates | Alternate Dues Dates | Instructor Name |
|------------------|--------------------|----------------------|-----------------|
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| 6. | | | |
| 7. | | | |
| 8. | | | |

If assignment deadlines are **not extended**, either partially or in total:

- I have discussed with the student how deadline extensions fundamentally alter essential course requirements.
 Please contact me to discuss equally effective alternative accommodations.

Instructor Signature: _____ Date: _____

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To be used in the event of additional assignments.

| Assignment Title | Original Due Dates | Alternate Dues Dates | Instructor Name |
|------------------|--------------------|----------------------|-----------------|
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| 6. | | | |
| 7. | | | |
| 8. | | | |
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| 14. | | | |
| 15. | | | |
| 16. | | | |
| 17. | | | |
| 18. | | | |
| 19. | | | |
| 20. | | | |

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PROCEDURE

Title: Requesting/Canceling Remote Communication Access Realtime Translation (CART) Services Procedure for Students who are D/deaf or Hard-of-Hearing

Effective Date: 11/15/2023

Applies to: All Students Enrolled at ^{HF}CDHP with Real-time Captioning as an Approved Accommodation

Statement: Western University of Health Sciences' (WesternU) Harris Family Center for Disability and Health Policy (^{HF}CDHP) will facilitate the provision of Remote Communication Access Realtime Translation (CART) services as set forth under Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA) of 1990, the ADA Amendments Act (ADAAA) of 2008, state law, and University guidelines for student(s) that are D/deaf or hard of hearing when approved as an accommodation by ^{HF}CDHP.

Purpose: To ensure students with disabilities receive an equal opportunity to participate in and benefit from courses, programs, services, or activities offered through WesternU.

Related Information: Provision of Academic Accommodation(s) Policy

Procedure Steps:

| | Action | Responsible for Implementing |
|----|---|------------------------------|
| 1. | Once ^{HF} CDHP's Associate Director, Director, or Disability Specialist approves a student for remote CART services, the designated ^{HF} CDHP staff member will contact the appropriate College to obtain the student's class and rotation schedule for reference. | ^{HF} CDHP Staff |
| 2. | It is the student's responsibility to complete the ^{HF} CDHP Remote CART Request Form and submit it to disabilityaccommodations@westernu.edu a minimum of seven (7) business days prior to the request date for a captioner(s). ^{HF} CDHP cannot schedule captioners until the completed form is received. | Student |
| 3. | Upon receipt of the completed Remote CART Request Form, the designated ^{HF} CDHP staff member will contact the CART vendor and follow their procedure to schedule captioners for the student. | ^{HF} CDHP Staff |
| 4. | Weekly, the designated ^{HF} CDHP staff member will add the names of the captioners assigned to each requested class/activity on the form and will email it to | ^{HF} CDHP Staff |

| | | |
|-----|---|--|
| | the student two (2) days prior to the commencement of the scheduled assignment. | |
| 5. | It is the student's responsibility to notify ^{HF} CDHP regarding changes to their class schedule including the addition or cancellation of classes/activities at least three (3) business days before the scheduled assignment or as soon as it is known so that the captioners can be notified of the changes. Changes can be made by emailing ^{HF} CDHP at disabilityaccommodations@westernu.edu . | Student |
| 6. | The designated ^{HF} CDHP staff member will contact the contracted CART vendor to add/adjust/cancel the captioner assignment request. | ^{HF} CDHP Staff |
| 7. | The designated ^{HF} CDHP staff member will email the student to confirm the schedule adjustment or cancellation has been made. | ^{HF} CDHP Staff |
| 8. | Services may be suspended if two (2) or more classes/rotation days are missed without prior notification. The student will need to meet with the Director of ^{HF} CDHP or their designee before services are reinstated. | Student/Director of ^{HF} CDHP |
| 9. | All communication regarding requests for services, late notifications, extensions on requests, or cancellations, etc. need to be made between the student and ^{HF} CDHP. Students are not to communicate with real-time captioners directly regarding scheduling issues or make any personal scheduling arrangements with the captioner(s). | Student |
| 10. | Real-time captioners will log off after twenty (20) minutes if the student does not attend class/lab/clinical rotation unless they have notified ^{HF} CDHP one (1) business day prior that they will be late and need the captioner(s) to stay. | Student |
| 11. | It is the student's responsibility to notify ^{HF} CDHP about any questions or concerns at disabilityaccommodations@westernu.edu . | Student |

Definitions/Acronyms:

Real-time Captioning - is the method of captioning in which captions are simultaneously prepared and transmitted at the time of origination by specially trained real-time captioners.

Deaf/deaf – Deaf with a capital “D” is used to describe individuals who identify as culturally Deaf and are actively engaged with the Deaf Community. Deaf with a lower-case “d” refers to individuals who view hearing loss as a physical condition.

Hard of Hearing – Is a widely accepted term to describe individuals who have hearing loss.

ADA – Americans with Disabilities Act of 1990

ADAAA – Americans with Disabilities Act Amendments Act of 2008

CART - Remote Communication Access Realtime Translation

^{HF}CDHP – Harris Family Center for Disability and Health Policy

WesternU – Western University of Health Sciences

Regulatory Information: Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990; ADA Amendments Act of 2008, and California and Oregon state law

References, if applicable:

Related Policy: Provision of Accommodation(s), Sign Language Interpreter Request Procedures for WesternU Students and Patients who are D/deaf or Hard-of-Hearing

Related Links: [^{HF}CDHP Webpage](#), [Provision of Accommodation\(s\) Policy](#)

Related Forms: Remote CART Request Form

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Marcelle Daniels, Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

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| Academic Senate | General Counsel | Provost's Office |
| Biosafety Committee | Human Resources | Radiation Safety Committee |
| Board of Trustees | IACUC | VP Research & Biotechnology |
| Chief Financial Officer | Information Technology | Sponsored Programs |
| Clinic Administration | Institutional Review Board | X University Risk Management |
| Dean's Council | Operations Council | University Compliance Office |
| Directors of Operations | President's Office | University Policy Office |
| Environmental Health & Safety | Procurement | X University Student Affairs |



PROCEDURE

Title: Sign Language Interpreter Request/Cancellation Procedures for WesternU Students and Patients who are D/deaf or Hard-of-Hearing

Effective Date: 11/15/2023

Statement: Western University of Health Sciences' (WesternU) Harris Family Center for Disability and Health Policy (^{HFC}CDHP) will facilitate the provision of a qualified sign language interpreter for students(s) that are D/deaf or hard-of-hearing when approved as an accommodation by ^{HFC}CDHP and for patients of WesternU's Patient Care Center who are D/deaf or hard-of-hearing and require a sign language interpreter for communication.

Purpose: To ensure students with disabilities receive an equal opportunity to participate in and benefit from courses, programs, services, or activities offered through the college and so that patients can communicate with their healthcare provider(s) so that they receive the quality care they are entitled to under federal and state law.

Procedure Steps: Students Requesting/Cancelling Sign Language Interpreters

| | Action | Responsible for Implementing |
|---|---|------------------------------|
| 1 | Once ^{HFC} CDHP's Associate Director, Director, or Disability Specialist approves a student for sign language interpreting as an accommodation, the designated ^{HFC} CDHP staff member will contact the appropriate College to obtain the student's class and rotation schedule for reference. | ^{HFC} CDHP Staff |
| 2 | It is the student's responsibility to complete ^{HFC} CDHP's Sign Language Interpreter Request Form and submit it to disabilityaccommodations@westernu.edu a minimum of seven business days prior to the request date for sign language interpreters. ^{HFC} CDHP staff will not schedule sign language interpreters until the completed form is received. | Student |
| 3 | Based on the Sign Language Interpreter Request Form, the designated ^{HFC} CDHP staff member will contact ^{HFC} CDHP's contracted sign language vendor to schedule interpreters for the student. | ^{HFC} CDHP Staff |
| 4 | Weekly, the designated ^{HFC} CDHP staff member will add the names of the interpreters assigned to each requested class/activity on the form and will email it to the student two (2) days prior to the commencement of the scheduled assignment. | ^{HFC} CDHP Staff |
| 5 | It is the student's responsibility to notify ^{HFC} CDHP at | Student |

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| | disabilityaccommodations@westernu.edu regarding changes to their class schedule including the addition or cancellation of classes/activities at least three (3) business days before the scheduled assignment or as soon as it is known so that the sign language interpreters can be notified of the changes. Changes can be made by emailing ^{HF} CDHP at disabilityaccommodations@westernu.edu . | |
| 6 | ^{HF} CDHP staff will contact the contracted sign language vendor to add/adjust/cancel the sign language interpreter assignment. | ^{HF} CDHP Staff |
| 7 | The designated ^{HF} CDHP staff member will email the student to confirm the schedule addition/adjustment/cancellation. | ^{HF} CDHP Staff/Student |
| 8 | Services may be suspended if two (2) or more classes/rotation days are missed without prior notification. The student will need to meet with the Director of ^{HF} CDHP or their designee before services are reinstated. | ^{HF} CDHP Staff/Student |
| 9 | All communication regarding requests for services, late notifications, extensions on requests, or cancellations, etc. need to be made between the student and ^{HF} CDHP. Students are not to communicate with interpreters directly regarding scheduling issues or make any personal scheduling arrangements with the interpreters. | Student/ ^{HF} CDHP Staff |
| 10 | Interpreters will leave after twenty (20) minutes if the student does not attend class/lab/clinical rotation unless they have notified ^{HF} CDHP one (1) business day prior that they will be late and need the interpreter(s) to stay. | Student/ ^{HF} CDHP Staff |
| 11 | It is the student's responsibility to notify ^{HF} CDHP about any questions or concerns at disabilityaccommodations@westernu.edu . | Student |

Procedure Steps: WesternU Health Patient Care Center Requesting/Cancelling Sign Language Interpreters for Patients

| | Action | Responsible for Implementing |
|---|---|-------------------------------------|
| 1 | When a patient requests a sign language interpreter for a scheduled appointment, the designated Patient Care Center (PCC) staff member will contact the patient's health insurance to determine if they will provide an interpreter or reimburse the interpreter cost/rate. | Patient Care Center Staff |
| 2 | If the patient's health insurance does not provide a sign language interpreter, but will pay either full or a negotiated rate, the designated department staff member will | Patient Care Center Staff |

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|---|---|-------------------------------------|
| | complete the Patient Sign Language Request form and fax it to ^{HF} CDHP within five (5) days of the scheduled appointment. The designated staff member will email the Associate Director of ^{HF} CDHP that the document has been faxed. The designated staff member will also provide information regarding the collection of said payment and either provide a check for repayment or a cash transfer for the cost by the date of the appointment. | |
| 3 | The Associate Director of ^{HF} CDHP will email the designated PCC staff member to confirm receipt of the payment. The designated ^{HF} CDHP staff member will contact WesternU's contracted sign language vendor to schedule an interpreter(s) for the patient. | ^{HF} CDHP Staff |
| 4 | ^{HF} CDHP's designated staff member will email the PCC staff member who requested the assignment confirmation of the assigned interpreter within two (2) days of scheduled appointment. | ^{HF} CDHP Staff |
| 5 | If a sign language request needs to be modified or cancelled, the PCC's designated staff member is required to notify ^{HF} CDHP in writing at least three (3) days before the scheduled patient appointment. ^{HF} CDHP staff will email the PCC's designated staff member to confirm receipt to cancel/modify the sign language appointment request. | PCC Staff/ ^{HF} CDHP Staff |
| 6 | ^{HF} CDHP's designated staff member will call or email the vendor regarding the cancelled/modified sign language interpreter request and communicate their response to the PCC's designated staff member by email. | ^{HF} CDHP Staff/PCC Staff |
| 7 | If the PCC's designated staff member fails to notify ^{HF} CDHP in writing at least three (3) days before the scheduled patient appointment of the need to cancel/modify the sign language interpreter request; the PCC will be held financially responsible for charges incurred for a late cancellation. | PCC Staff |

Definitions/Acronyms:

Deaf/deaf – Deaf with a capital “D” is used to describe individuals who identify as culturally Deaf and are actively engaged with the Deaf Community. Deaf with a lower-case “d” refers to individuals who view hearing loss as a physical condition.

Hard of Hearing – Is a widely accepted term to describe individuals who have hearing loss.

Sign Language Interpreter - Someone who interprets in sign language effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.

ACA - Affordable Care Act of 2010

ADA – Americans with Disabilities Act of 1990

ASL – American Sign Language

^{HF}CDHP – Harris Family Center for Disability and Health Policy

WesternU-Western University of Health Sciences

PCC-WesternU Health Patient Care Center

Regulatory Information: Section 504 of the Rehabilitation Act of 1973, (Section 504), 29 U.S.C. §794, Americans with Disabilities Act (ADA), 42 U.S.C. §12101, et. seq., ADA Amendments Act of 2008, California and Oregon state law, Affordable Care Act (ACA) of 2010, Section 1557, California Health and Safety Code § 1259, and WesternU Policies.

Related Policy: Academic Accommodation Provisions

Related Links: [Communication Accommodations](#)

Related Forms: Sign Language Interpreter Request Form, Patient Sign Language Interpreter Request form

Responsible Department: Harris Family Center for Disability and Health Policy (^{HF}CDHP)

Contact: Director of ^{HF}CDHP

Email: disabilityaccommodations@westernu.edu

Policy reviewed by: (check all that apply)

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GET IN TOUCH

FOLLOW US:



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