



**ACADEMIC AND HOUSING ACCOMMODATION
POLICIES AND PROCEDURES**

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ACCOMMODATION OVERVIEW

Purpose and Legal Framework

Accommodations are reasonable modifications or adjustments that provide equal access to the university's programs, services, and activities for qualified students with documented disabilities. The Office for Accessible Education (OAE) approves and coordinates these accommodations to remove disability-related barriers in both academic and residential settings. All approved accommodations are provided in compliance with **Section 504 of the Rehabilitation Act of 1973 (Subpart E)** and the **Americans with Disabilities Act (ADA) of 1990**, as amended by the **ADA Amendments Act of 2008**. Regulations under the **Fair Housing Act (FHA)**, as well as guidance from the **U.S. Department of Housing and Urban Development (HUD)** and the **U.S. Department of Justice (DOJ)**, are followed when relevant, particularly in matters related to housing accommodations. For questions about available accommodations, please refer to the university website or contact the OAE at accessibilityservices@usao.edu.

Definition of Disability

Disability can vary from person to person; some disabilities are visible, while others are not. Under the **ADA Amendments Act of 2008**, disability is defined as a physical or mental impairment that substantially limits one or more major life activities. Major life activities may include caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Common conditions that may require reasonable accommodation include:

- Psychological conditions such as depression or anxiety
- Sensory impairments (e.g., hearing or vision loss)
- Mobility impairments
- Chronic health conditions (e.g., diabetes, epilepsy, or autoimmune disorders)
- Learning disabilities and ADHD
- Autism spectrum disorder
- Traumatic brain injury (TBI)

Eligibility for Accommodation

To be eligible for accommodation, a student must have a physical or mental impairment that substantially limits one or more major life activities. A diagnosis alone does not automatically qualify a student for accommodation. Instead, eligibility is determined based on:

- An individualized assessment of the nature and extent of the impairment,
- The barriers the impairment presents in academic or residential settings, and
- Whether the requested accommodation is reasonable, does not impose undue hardship on the institution, and does not fundamentally alter essential academic or programmatic requirements.

The university is legally obligated to engage in an interactive process with the student, which includes reviewing appropriate supporting documentation and discussing how the disability impacts the student's access to university programs, services, or activities. This process is facilitated through the Office for Accessible Education (OAE), as outlined later in this document. Please note that accommodations are **not retroactive** and must be requested promptly to ensure effective implementation.

SUPPORTING DOCUMENTATION

General Requirements and Guidelines

To determine eligibility for reasonable accommodation, documentation submitted must meet the following requirements. All disability-related documentation will be kept confidential and shared only on a need-to-know basis, in compliance with applicable state and federal laws and regulations. Depending on the nature of the accommodation or the condition, updated documentation may be required each semester to ensure continued eligibility and appropriate support.

1. Functional Impact

Documentation must include a detailed explanation of how the condition substantially limits one or more major life activities, particularly with the specific barriers encountered in academic or residential settings.

2. **Connection Between Disability and Requested Accommodation**

Documentation should clearly describe the link between the diagnosed impairment and the specific accommodation being requested. This helps the institution determine whether the requested adjustments are appropriate and necessary to address the disability-related barriers.

3. **Diagnostic Details**

Documentation must include a clear diagnosis, the assessment tools used to establish that diagnosis, and the corresponding results. It must also provide a comprehensive description of the impairment's nature, severity, and expected duration. While diagnostic codes (e.g., DSM or ICD) are helpful for clarity, they are not legally required if the narrative clearly explains the diagnosis and functional impact.

4. **Provider Qualifications**

Documentation must be submitted on official letterhead and provided by a qualified diagnostician or a properly licensed healthcare or mental health professional. Please note that documentation prepared by a parent, family member, or friend, even if the individual is a licensed provider, **may not be accepted** due to potential conflicts of interest. All documentation must be impartial, clinically objective, and relevant to the requested accommodation.

5. **Recency of Documentation**

Documentation older than three years may still be accepted, but the Office for Accessible Education (OAE) must evaluate its relevance based on the nature of the disability.

6. **Provider Recommendations**

While not mandatory, it is preferable for documentation to include suggestions from the diagnostician (or properly licensed healthcare or mental health professional) for reasonable adjustments and auxiliary aids. These can help guide the accommodation process, as the final decision rests with the institution, not the provider.

ACADEMIC ACCOMMODATION

Academic accommodations are modifications or adjustments to a course, program, or learning environment that provide students with documented disabilities equal access to the rights, services, and opportunities available to students without disabilities. Academic accommodations are not designed to provide unfair advantages or guarantee academic success, but to remove disability-related barriers and ensure equitable access to educational opportunities. Implementation often requires collaboration between the student, OAE, and faculty members or academic departments to ensure that necessary adjustments are effectively and appropriately integrated.

Registration Process

Students with a documented disability who wish to register with the Office for Accessible Education (OAE) for accommodation must do the following:

- 1. Complete an Academic Accommodation Request Form**

Academic Accommodation Request Forms are available virtually on the university website. Once completed, this form must be submitted to the OAE for assessment.

- 2. Include Supporting Documentation**

Before submission, supporting documentation should be attached as outlined in the accommodation request form. All submitted documentation must be relevant to the specific accommodation being requested in the form. If documentation is not available at the time of submission, the student must notify the OAE and provide an anticipated submission date.

- 3. Complete an Interactive In-depth Intake Interview**

Upon receipt of a completed application and supporting documentation, the OAE will contact the student via their university email to schedule an interactive interview. This interview is a key component of the legally required interactive process between the student and the university. It provides an opportunity for the student to discuss their experiences, ask questions, and work collaboratively with the Accessibility Specialist to identify reasonable accommodations that directly address the access barriers described in the application.

Review and Decision Outcomes

Once the intake interview is complete, the Office for Accessible Education (OAE) will carefully consider the accommodation request, submitted documentation, and intake interview to determine accommodations that are reasonable and appropriate within the university setting. The student will be notified via email with one of the following application statuses:

1. **Application Approved**

If the application is approved, the student will receive an official academic accommodation letter via their university email to distribute to relevant faculty. The timeline for issuing an accommodation letter may vary depending on when the application is submitted, the completeness of supporting documentation, and the nature of the accommodation requested. In some cases, it may take up to **10 business days** for the letter to be issued.

2. **More Information Needed**

If an application lacks sufficient information or documentation to support the need for reasonable academic accommodation, the student will be notified during the intake interview or via their university email. A follow-up meeting with the Accessibility Specialist may be required to review any outstanding materials, and guidance will be provided on how to proceed appropriately.

3. **Application Not Approved**

If the application is not approved, the student will be notified during the intake interview or via their university email. This email will detail the reason(s) for the denial and outline the next steps the student can take. Students may appeal the decision by following the **Student Grievance Procedure (Appeals Process)** at the end of this document.

Reapplication Process

Academic accommodation is **not automatically applied** each semester, so students must request their accommodation letter each term as needed. This process ensures that accommodations remain relevant to the student's current academic schedule and needs. Students are encouraged to submit their requests **as early as possible** each semester to allow adequate time for review, approval, and timely implementation.

HOUSING ACCOMMODATIONS

Housing accommodations are modifications or adjustments to the residential environment that ensure students with documented disabilities have equal access to the rights, services, and opportunities available to students without disabilities. These accommodations are not intended to provide an unfair advantage or guarantee a preferred housing placement, but to remove disability-related barriers and ensure equitable access to university housing opportunities. **Please note** that while Emotional Support Animal (ESA) accommodations are considered housing accommodations, they are governed by a separate policy and not covered in this document.

Registration Process

Students with a documented disability who wish to register with the Office for Accessible Education (OAE) for accommodation must do the following:

- 1. Complete a Housing Accommodation Request Form**

Housing Accommodation Request Forms are available virtually on the university website. Once completed, this form must be submitted to the OAE for assessment.

- 2. Include Supporting Documentation**

Before submission, supporting documentation should be attached as outlined in the accommodation request form. All submitted documentation must be relevant to the specific accommodation being requested in the form. If documentation is not available at the time of submission, the student must notify the OAE and provide an anticipated submission date.

- 3. Complete an Interactive In-depth Intake Interview**

Upon receipt of a completed application and supporting documentation, the OAE will contact the student via their university email to schedule an interactive interview. This interview is a key component of the legally required interactive process between the student and the university. It provides an opportunity for the student to discuss their experiences, ask questions, and work collaboratively with the Accessibility Specialist to identify reasonable accommodations that directly address the access barriers described in the application.

Review and Decision Outcomes

Once the intake interview is complete, the Office for Accessible Education (OAE) will carefully consider the accommodation request, submitted documentation, and intake interview to determine accommodations that are reasonable and appropriate within the university setting. The student will be notified via email with one of the following application statuses:

1. Application Approval

If the application is approved, the student will receive an official housing accommodation letter via their university email. Housing will be copied on this email to ensure all necessary parties are informed and adjustments can be made accordingly. **Housing accommodation is subject to availability**, so implementation may require additional time depending on when the request was submitted, the nature of the accommodation, and the current housing inventory.

2. More Information Needed

If an application lacks sufficient information or documentation to support the need for reasonable housing accommodation, the student will be notified during the intake interview or via their university email. A follow-up meeting with the Accessibility Specialist may be required to review any outstanding materials, and guidance will be provided on how to proceed appropriately.

3. Application Not Approved

If the application is not approved, the student will be notified during the intake interview or via their university email. This email will detail the reason(s) for the denial and outline the next steps the student can take. Students may appeal the decision by following the **Student Grievance Procedure (Appeals Process)** at the end of this document.

Reapplication Process

Housing accommodation requests must be **submitted annually** to the OAE to ensure each student's needs are reviewed and addressed appropriately for the upcoming academic year. Students are encouraged to submit requests **as early as possible** to allow sufficient time for coordination and to maximize the likelihood of a successful placement.

TEMPORARY ACCOMMODATIONS

In certain cases, the Office for Accessible Education (OAE) may assist with coordinating temporary accommodation for students experiencing short-term impairments, recent diagnoses, or ongoing evaluations for disability. These accommodations are designed to offer limited support for a defined period while documentation is being gathered, or a condition is being evaluated. Temporary accommodations are **not retroactive** and are not intended as a substitute for full eligibility under the **Americans with Disabilities Act (ADA)** or **Section 504 of the Rehabilitation Act**.

Academic Accommodations

Students experiencing temporary conditions that significantly impact their ability to access coursework (e.g., recovery from surgery, concussion, or other time-limited impairments) may be eligible for short-term academic accommodation. These accommodations are arranged on a case-by-case basis with the OAE, often in consultation with the course instructor(s), following an intake meeting and review of any available documentation. Faculty may choose to offer limited flexibility at their discretion; however, such informal arrangements do not constitute official accommodation and should not replace referring students to the OAE.

Housing Accommodations

Temporary housing accommodations may be approved when a student's immediate health or safety needs require a change in living environment before permanent accommodations can be determined. This may include temporary room reassignment, access to a first-floor unit, or other adjustments. Temporary housing placements are subject to availability and may not reflect final, long-term assignments.

Review and Expiration

All temporary accommodation is time-limited and subject to periodic review. Students approved for temporary accommodation must submit supporting documentation by the deadline established during the intake process. If documentation is not received by the specified date, temporary accommodation may expire, and the student will need to contact the OAE to determine eligibility for continued or permanent accommodation.

ACCOMMODATION LETTERS

An accommodation letter is a formal notification issued by the Office for Accessible Education (OAE) that outlines the approved accommodations for a student with a documented disability. These letters inform faculty and relevant staff of the specific adjustments required to ensure the student's equitable access to university programs, services, and activities. To protect student privacy, accommodation letters do not include medical diagnoses or personal health information, in compliance with federal law and institutional policy. Students retain the right to decide whether to share additional personal or diagnostic details with faculty, staff, or others on campus.

Legal Obligations and Protections

Accommodation letters are part of the federally mandated interactive process under **the Americans with Disabilities Act (ADA)** and **Section 504 of the Rehabilitation Act**. They constitute the university's official, legally binding determination of reasonable accommodations. Faculty and staff are required to implement the accommodations listed, thereby upholding federal law, protecting student rights, ensuring institutional compliance, and helping prevent unintentional discrimination. Any faculty or staff with concerns about the reasonableness of an approved accommodation should refer to the appeals process outlined later in this document.

Academic Versus Housing Letters

Academic accommodation letters are issued directly to students, who are responsible for distributing them to faculty each semester. This process allows students to manage their disclosure and collaborate with faculty to implement accommodations. Details regarding student and faculty responsibilities after receiving academic letters are provided later in this document.

In contrast, housing accommodation letters are shared with both the student and USAO Housing. This reflects the administrative nature of housing accommodation, which often requires coordination between Housing and the Office for Accessible Education (OAE). Such accommodation may involve logistical arrangements, such as room assignments or physical modifications, that cannot be managed by the student alone.

STUDENT RESPONSIBILITIES

Accommodation Implementation

1. Distributing Academic Accommodation Letters

- **Timely Delivery:** Students must provide their academic accommodation letter (via email or hard copy) to each faculty member for any course in which accommodation is desired. Letters should be shared **as early as possible** in the semester, as accommodations are **not retroactive**.
- **Late Delivery:** Delayed distribution may result in postponed or denied access to approved accommodations. The university is **not responsible** for non-implementation if the student does not provide the letter on time.
- **Voluntary Use:** No student is required to use approved accommodations. Neither the OAE nor faculty may compel a student to use them.

2. Communicating with Faculty

- **Initiating the Discussion:** Students are encouraged to meet or correspond with each faculty member to discuss how accommodations will be provided.
- **Clarification:** Students should raise any concerns and confirm that the faculty member has the necessary information to facilitate accommodation appropriately.

3. Scheduling with the Assessment Center (for Testing Accommodations)

- **Exams and Midterms:** Students must schedule exams at least **seven (7) business days** in advance. Before scheduling, students must inform each faculty member of which testing accommodation they intend to use.
- **Rescheduling:** If a faculty member changes a test date after the student has scheduled, the student must promptly notify the Assessment Center to arrange an alternative.
- **Final Exams:** Students must register for final exams at least **ten (10) business** days in advance. Late registration may limit the Assessment Center's ability to provide accommodation. Students are encouraged to schedule exams **early in the semester**, using their course syllabi and the USAO final exam schedule as planning tools whenever possible.

Support for Students Unable to Distribute Letters

If a disability-related barrier prevents a student from independently distributing their academic accommodation letter, they must notify the Office for Accessible Education (OAE) as soon as possible. Upon notification, the OAE will:

1. **Assess the Barrier:** Determine the nature and severity of the barrier, such as physical limitations or anxiety, and evaluate whether reasonable supports exist to enable the student to distribute the letter independently.
2. **Facilitate Distribution:** In the absence of alternative supports, the OAE will promptly email the accommodation letter to the faculty designated by the student.
3. **Provide Additional Support as Needed:** Based on the specific disability-related barrier, the OAE may offer guidance on accessing resources, clarify accommodation procedures, or assist with any other concerns the student has about their accommodations.

This process preserves student dignity and autonomy while ensuring equitable access by tailoring support to each student's unique needs.

Process for Accommodation Implementation Concerns

If a student encounters challenges with the successful implementation of their approved accommodations, they must notify the Office for Accessible Education (OAE) promptly to prevent further barriers to access. Upon notification, the OAE will:

1. **Verify Letter Distribution:** Confirm that the accommodation letter was delivered to the appropriate faculty members.
2. **Clarify Accommodation Details:** Ensure that both the student and faculty member understand the intent and scope of the approved accommodations.
3. **Facilitate Resolution:** Collaborate with all parties to address concerns and ensure accommodations are implemented as approved.
4. **Provide Guidance or Mediation:** Offer additional support or mediation if confusion or conflict arises during the implementation process.
5. **Document the Process:** Record all communications and actions taken to support compliance with the ADA and Section 504.

FACULTY RESPONSIBILITIES

Accommodation Implementation

1. **Review and Confidentiality.** Upon receiving an academic accommodation letter, faculty are responsible for reviewing the listed accommodations and implementing them as directed. To protect student privacy, all discussions regarding accommodations must be conducted privately to maintain the confidentiality of the student's disability-related information.
2. **Accommodation Clarification.** Faculty are encouraged to communicate proactively with students if clarification is needed regarding the implementation of specific accommodations or assistive technologies. Likewise, students share responsibility for notifying faculty about any accommodation-related concerns.

Academic Flexibility Versus Official Accommodations

Faculty may occasionally offer informal academic flexibility (e.g., deadline extensions or excused absences) as a form of support to students. While such flexibility reflects compassionate teaching, it is important to distinguish it from formal accommodations.

- **Disability-Related Accommodations.** Only the Office for Accessible Education (OAE) is legally authorized to approve disability-related accommodation. Faculty may not independently create, modify, or deny these accommodations, as doing so may place the institution at risk of noncompliance with federal law.
- **Legal Protections.** Formal accommodations approved through the OAE are protected under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. These laws require institutions to provide equal access to students with disabilities through an established, interactive process.
- **Inconsistent Treatment.** Providing accommodations outside of the formal OAE process can result in unequal treatment, confusion, and potential failure to meet ADA and Section 504 standards. This places students at a disadvantage and increases the risk of discrimination claims and institutional liability.

Faculty concerned about disability-related needs should refer students to the OAE for formal evaluation and support, ensuring they receive comprehensive review and necessary documentation for legally protected accommodations.

Facutly Appeal Process for Approved Accommodations

Facutly members who question the reasonableness of approved accommodation may follow the process outlined below for a formal accommodation review. This ensures that all concerns are addressed in a manner that complies with federal disability law, protects student rights, and upholds academic integrity and course standards.

1. Contact the Office for Accessible Education (OAE)

Facutly must first contact the OAE before raising concerns with the student. This step ensures the matter is handled appropriately and legally and helps maintain a supportive and non-adversarial environment.

2. OAE Review of Course and Syllabus

The OAE will review the course syllabus, learning objectives, and any related licensure or accreditation requirements to determine whether the accommodation would fundamentally alter the nature of the course or its essential elements.

3. Collaborative Discussion

The OAE will work with the faculty member in question to assess the impact of the accommodation, clarify its purpose, and explore adjustments or alternative accommodations that maintain access without compromising academic standards.

4. Formal Determination

If the OAE determines the accommodation does not fundamentally alter the course, it must be implemented as written. If a fundamental alteration is determined, the OAE may identify alternative accommodations that still meet the student's access needs.

5. Final Appeal to the Dean of Students

If no resolution is reached, the faculty member may submit a formal written appeal to the **Dean of Students**. The Dean will review the case in consultation with relevant academic and legal stakeholders and issue a final, binding determination.

Note: Until a final determination is made, faculty must implement the originally approved accommodation(s) unless the OAE advises otherwise. This ensures compliance with federal obligations and prevents discriminatory delays in access.

STUDENT GRIEVANCE PROCEDURE (APPEALS PROCESS)

Students who disagree with an academic or housing accommodation decision made by the Office for Accessible Education (OAE) have the right to appeal the decision through the process below. Students are encouraged to provide as much detailed information and evidence as possible throughout the entirety of this appeals process.

Step 1: Initial Appeal to the USAO Accommodations Team

1. Submission of the Appeal

Students must complete an Accessibility Grievance Form (available on the university website) detailing the basis of their appeal. The completed form, along with any supporting documentation, must be emailed to the OAE.

2. Review Process

The USAO Accommodations Team will review the grievance, which may include conducting an investigation, requesting additional documentation or information, and/or holding interviews with relevant parties.

3. Decision Notification

A formal response letter detailing the decision will be sent to the student's university email address.

Step 2: Secondary Appeal to the Dean of Students

1. Filing a Secondary Appeal

If the student is dissatisfied with the USAO Accommodations Team's decision, they may submit a new Accessibility Grievance Form to the Dean of Students. The appeal should include any updated or additional evidence relevant to the grievance.

2. Review by the Dean of Students

The Dean of Students may conduct a comprehensive review, which can involve:

- An independent investigation.
- Requesting further documentation or clarification.
- Interviewing individuals involved in the case.

3. **Final Decision Notification**

A formal response letter will be sent to the students' USAO email with the final determination. The decision made by the **Dean of Students** will represent the university's **final resolution of the grievance**.

Both the USAO Accommodations Team and the Dean of Students prioritize fairness, thorough review, and adherence to legal standards in their decision-making processes. The decisions made at each step will be documented and communicated to the student in writing. This process ensures that students have access to a fair and transparent mechanism for resolving disputes related to accommodation while maintaining the integrity and compliance of university policies.