



CAMPUS ACCESSIBILITY SERVICES (CAS) – STUDENT HANDBOOK

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PURPOSE STATEMENT AND CONTACT INFORMATION

This Handbook for Campus Accessibility Services (CAS) has been prepared for general information purposes only. No statement appearing in this Handbook constitutes a contractual obligation by the USNH Board of Trustees or the University. If any official policy statements of the USNH Board of Trustees or the University are in contradiction to statements appearing in this Handbook, such official policy statements will be deemed to have control over the statements appearing in this document. The USNH Board of Trustees and the University reserve the right to alter the terms of official policy statements and/or this Handbook at any time, without advance notice.

CAS CONTACT INFORMATION

HOURS OF OPERATION

Monday-Friday, 8:00am-4:30pm

LOCATION

Speare Administration Building, 2nd Floor

MSC 9

17 High Street

Plymouth, NH 03264

HOW TO SCHEDULE AN APPOINTMENT

- Use our Bookings link:
<https://outlook.office365.com/owa/calendar/CampusAccessibilityServices1@wildcatsunh.onmicrosoft.com/bookings/>
- Call 603-535-3300
- Email our office at PSU.CAS@plymouth.edu

When scheduling an appointment, please be prepared to provide the following:

- Your full name
- Contact information
- Reason for the appointment
- Best days and times to meet for your schedule

MEET THE CAS STAFF

LINDSAY PAGE, DIRECTOR

lbp@plymouth.edu

Lindsay is a Plymouth State alum who has been working with students with disabilities at a variety of grade levels for over a decade. She began working for Campus Accessibility Services in 2015 and was promoted to director in her second year of employment at PSU. Prior to coming here, she taught at a therapeutic residential school for students with emotional, behavioral, and learning differences and before that, she operated a middle school learning center in Scarborough, Maine.

Lindsay's professional interests include supporting students on the autism spectrum in their transition to college, both academically and socially. She also promotes Universal Design for Learning and offers support to faculty to aid them in making their courses accessible for all learners.

As CAS director, Lindsay oversees the daily operations of CAS, works with campus partners to support students, and works with the Accessibility Support Coordinator to provide accommodations and service to all students with disabilities at PSU. Lindsay serves on the Inclusion, Diversity, Equity, and Access Council, the Behavior Intervention Team (BIT), and the CARE team.

Lindsay lives in Plymouth with her husband, son, and daughter. In her free time, she enjoys spending time with family and friends and especially loves visiting her family's rustic camp in Maine.

Lindsay Page has a Bachelor of Science in Childhood Studies, Teacher Certification K-8 (2005) and a Master of Arts in Human Relations (2019).

SYDNEY BELLIMER, ACCESSIBILITY SUPPORT COORDINATOR

srbellimer@plymouth.edu

Sydney is a Plymouth State alum who began her career working with students right here on campus. During her undergrad, she was heavily involved in the TRIO Scholars program as a mentor and fellow, which ignited her passion for working with students of all backgrounds, particularly those with disabilities. She returned to Plymouth State in 2021 to begin a master's program in School Counseling with a certificate in Play Therapy, which is still in progress.

Sydney's professional interests include advocacy for students' mental health, neurodiversity, diversity education and inclusion, and LGBTQ+ rights. She has presented research projects and writings on supporting transgender and gender non-conforming students in schools, ADHD, complex PTSD, career development in college students, and multi-tiered system of supports (MTSS) in schools.

Sydney lives with her partner and dog, and in her free time enjoys crafting, video games, and spending time outdoors.

CAMPUS ACCESSIBILITY SERVICES (CAS) OVERVIEW

Campus Accessibility Services (CAS), a department within Academic Affairs, serves a growing number of students with documented disabilities entering higher education. These students include undergraduate, graduate, and continuing education students. CAS helps students navigate the accommodations process and, ultimately, helps determine reasonable accommodations. The goal is to ensure equal access to all PSU students with disabilities.

CAMPUS ACCESSIBILITY SERVICES (CAS) MISSION

Campus Accessibility Services (CAS) is committed to assuring that students with disabilities receive equitable, effective, and meaningful access to all campus programs, resources, and services. CAS is responsible for ensuring academic and housing accommodations. CAS recognizes disability as an aspect of diversity that is integral to society and to our campus community. CAS facilitates and supports student growth and development toward empowerment, self-advocacy, and personal responsibility. Additionally, we are a source of information and referral, a resource and collaborative partner for the campus community, and a point of support and advocacy regarding access issues in general.

CAMPUS ACCESSIBILITY SERVICES (CAS) VISION

Campus Accessibility Services (CAS) seeks to create a welcoming, inclusive, and universally accessible community where everyone can participate fully in all aspects of the PSU experience.

PSU DIVERSITY STATEMENT

Plymouth State University is a community that takes pride in celebrating diversity and embracing differences among all people. Diversity is one of our core values, and we have a longstanding commitment to being a vibrant, inclusive, and multicultural community.

Because PSU is a student-centered institution, our priorities guide us to prepare students for life in a diverse world and to help them gain a global perspective.

We also strive to create an environment that values and supports diversity, equity, and inclusiveness across our community. We are dedicated to providing learning experiences and fostering the constructive discussion of a range of opinions in order to promote enhanced understanding and respect for all people.

KEY LEGAL REQUIREMENTS

The accommodation processes, rights and responsibilities, and other relevant guidance within CAS are guided by:

- The Americans with Disabilities Act (ADA); Americans with Disabilities Act Amendments Act (ADAAA)
- 504 of the Rehabilitation Act of 1973 (Section 504)
- Fair Housing Act (FHA)

THE AMERICANS WITH DISABILITIES ACT (ADA); AMERICANS WITH DISABILITIES ACT AMENDMENTS ACT (ADAAA)

The ADA was initially enacted in 1990 as a comprehensive civil rights law to prohibit discrimination against people with disabilities. The intent was and continues to be today in the revision (ADAAA) to apply to all facets of public

life. This includes institutes of higher education under Title II. This legislation provides a range of definitions, and guides much of the work of CAS.

[ADA Regulations and Standards](#)

504 OF THE REHABILITATION ACT OF 1973 (SECTION 504)

Section 504 of the Rehabilitation Act was enacted in 1973. It was one of the first civil rights legislation that specifically applied to people with disabilities. It covers any program receiving federal funds, and, therefore, is applicable within higher education. In terms of impact related to provision of accommodations for students with disabilities in higher education, Section 504 and the ADA have similar requirements.

FAIR HOUSING ACT (FHA)

The Fair Housing Act was enacted in 1968 as part of an expansion of the Civil Rights Act of 1964, and was subsequently amended in 1988. This act specifically, “protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing.”¹ Disability discrimination is one of the key areas addressed within the act.

[The Fair Housing Act](#)

WHAT DOES CAS DO?

CAS has several main functions that center around providing necessary supports for students with disabilities in order for them to engage fully in the college experience at PSU. This is achieved through student accommodations, assistive technology, legal responsibilities, and university policies.

STUDENT ACCOMMODATIONS

The primary function of CAS is to accept and review documentation and through an interactive process provide students with accommodations. CAS often does not directly implement student accommodations done by faculty, housing, parking, and other relevant staff. CAS does, however, support all these campus partners to ensure that accommodations are effectively delivered.

It is important to note that we do not provide accommodations to faculty and staff. That work is completed by the [PSU Human Resources Office](#).

ASSISTIVE TECHNOLOGY

Another core function of CAS is to help students with potential Assistive Technology (a particular type of technology designed to meet the specific needs of an individual) needs. That includes:

- Helping students determine what technology might be right for them

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview

- Working with students to help understand how their AT can work most effectively for them in their courses
- Working with faculty to create learning environments where students can utilize their technology most effectively
- Collaborating with IT on accessibility throughout the PSU infrastructure.
- Collaborating with ATinNH as needed for AT evaluations and supports

CAS PROCTORED EXAMS

Available in the CAS office is a testing room for students registered with CAS. The space is designed to be a low-distraction and accessible space that meets the needs of a variety of learners. There are adjustable desks, calculators, a variety of software, and other accommodation supports. Students with the following accommodations most commonly utilize the testing space:

- Reduced distraction environment
- Double time (100% time)
- Assistive Technology needs

While a variety of accommodation needs can be met within the testing room in CAS, not all needs can be met in the environment. CAS cannot:

- Provide students with individual spaces
- Support exams that include experimental or lab components
- Support exams that have collaborative components

PSU COMMUNITY COLLABORATION

Student needs go beyond just the classroom. A large part of what we do in CAS is focused on providing resource referrals and support to the PSU community. Collaboration with campus partners can take many forms, including:

- Diversity, Equity, and Inclusion initiatives [IDEA](#)
- Tutoring and the TRIO program in [PASS](#)
- Supporting students and student initiatives
- Encouraging and supporting accessible and inclusive practices
- Outreach to external partners
- Outreach to prospective students and families
- Working with PSU [Counseling Center](#)
- Referrals to [Frost House](#) student services
- Connecting students with Academic and Career Advising [ACAC](#)

PRIVACY AND DATA POLICIES

CAS FERPA REQUIREMENTS

All student information shared with CAS is protected by the Family Educational Rights and Privacy Act (FERPA), Section 504 of PL.94-142, and the ADA-AA. In accordance with FERPA, CAS staff members will only share

information about a student with a disability if a university official has a legitimate educational interest as determined by CAS.

If a student wants CAS to share information about their CAS record (this includes releasing it), this request must be made in writing.

CAS retains information related to the student record in Accommodate. As per institutional requirements, all student records will be deleted after seven years. If a student requests information past this timeline, CAS will no longer be able to share this information.

For more information about FERPA requirements please visit the [Office of the Registrar's FERPA Webpage](#).

RECORD DELETION

As per FERPA requirements, CAS deletes student records either:

- 7 years after student graduation, or
- After 7 years of inactivity with CAS

We recommend that upon graduation you talk with CAS about any documentation or records you feel you might need later. For instance, to assist in requesting accommodations at another university or on a graduate entry exam. Once student records are deleted, CAS will no longer have access to documentation, accommodation letters, or additional information about your experiences in CAS.

COMPLAINTS AND GRIEVANCES

Concerns about accommodations should be directed to CAS. CAS can explore the concern to help ensure a timely resolution to the matter. This can include direct outreach to faculty or departments and directly working with other PSU offices involved in the implementation of the accommodation (housing, parking, etc.).

Unresolved concerns and/or actions regarding CAS should be reported to our Section 504 Coordinator, Janette Wiggett. (603-535-2206, jtwiggett@plymouth.edu)

If you have observed, experienced or been provided information about an incident of sexual harassment, and, or sexual violence, please report the incident by contacting the Title IX office in the Frost House at 603-535-2206 or submit a report via the [Sexual Harassment/Assault and Title IX Notification Form](#). Anonymous reports may be submitted except for Mandatory Reporters.

If you have observed, experiences or been provided information about an incident of bias, retaliation, or discrimination you can reach out directly to Janette Wiggett (jtwiggett@plymouth.edu) or Alberto Ramos (alberto.ramos@plymouth.edu) or submit a report via the [Bias Related Incident Reporting Form](#).

External resources. At any time during the process, a complainant may also choose to consult with one or more of these external agencies: [US Department of Education, Office for Civil Rights](#) and [U.S. Department of Housing and Urban Development](#).

ACCESSING SERVICES AT CAS

The accommodation process through CAS determines what accommodations are reasonable for an individual student. While each student's approved accommodations may vary, every student must go through the interactive process. This process involves the following steps:

- Step 1. Student registration/student documentation submission
- Step 2. Documentation review by CAS
- Step 3. Student meeting with CAS
- Step 4. Accommodation implementation

These steps are flexible, but all the steps are done in determining a student's accommodations. This process allows CAS to explore the nature of the disability, the functional limitations, and the requested accommodations with the student directly. Please note, there may be situations in which all steps are not necessary. For instance, there could be situations related to housing accommodation requests that may differ.

WHAT ARE ACCOMMODATIONS?

Accommodations are personalized supports that remove specific barriers with the goal of ensuring an individual can meet essential requirements or perform their job duties. The purpose of accommodations is not to change the academic/technical standards or alter requirements, but instead provide different means of access to the individual. ADA requires universities to provide reasonable accommodations.

Importantly, accommodations are determined on a case-by-case basis and are the result of an individualized assessment. Accommodation requests should be considered as individual requests and investigated as such. The result of this interactive process is student accommodations. Accommodations range in type and implementation depending on the nature and impact of the student's condition(s). Most common accommodations include:

- Classroom Accommodations (e.g., notetaking assistance, technology access, personnel support)
- Exam Accommodations (e.g., additional time, alternative testing spaces, technology access)
- Course Accessibility Accommodations (e.g., accessible educational materials, captions, accessible spaces)
- Flexibility Exploration (e.g., attendance agreements, deadline agreements, participation)
- Policy Alterations (e.g., course substitutions, alternate course of study, ability to use a laptop for notetaking)
- Other Accommodations (e.g., housing, parking, transportation, dining)

Though there is a great deal of flexibility with the types of accommodations approved, accommodations cannot fundamentally alter an essential requirement². That is not to say that modifications should not be considered, but they need to be considered within the context of essential requirements.

AUXILIARY AIDS AND SERVICES

Importantly, the ADA regulations also make a distinction between accommodations and auxiliary aids and services. The Title II regulations provide the following definition:

² https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm

(1) Qualified interpreters on-site or through video remote interpreting (VRI) services; notetakers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing;

(2) Qualified readers; taped texts; audio recordings; Braille materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;

(3) Acquisition or modification of equipment or devices; and

(4) Other similar services and actions.³

This distinction is important. While universities are not responsible for providing personal services, they are responsible for providing students with auxiliary aids and services. It should be noted that many of these are related to accessibility requirements.

HOUSING-ONLY ACCOMMODATIONS

CAS works with students to approve housing accommodations. Housing accommodations are applicable across all residence halls and PSU housing options. Housing accommodations range in type, but most commonly relate to:

- Placement accommodations
- Living environment accommodations
- Kitchen accommodations
- Bathroom accommodations
- Emotional Support Animals (ESAs)

Specific accommodations depend on the student need and housing availability.

CAS cannot approve housing requests for off-campus students. Off-campus students must engage in the interactive process established by the landlord of the off-campus living space.

HOW DOES THE FAIR HOUSING ACT DEFINE ACCOMMODATIONS?

It is important to distinguish general requests from housing-only requests. Though the ADA and Section 504 still apply when considering housing, housing accommodations need to be considered within the mandates of the Fair Housing Act (FHA).

The FHA calls for the provision of reasonable accommodations and modifications within housing. "A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary

³ https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm

for a person with a disability to have equal opportunity to use and enjoy a dwelling, including public and common use spaces.”⁴

It should be noted that HUD also explicitly states that it can include modifications as well⁵. Generally, when they are considering modifications, it is within the context of modifying a living space with things like chair rails or accessible furniture. As with other laws relating to accommodations, modifications do not have to be provided if they constitute an undue burden or a fundamental alteration to a program. Overall, the goal is for the individual to have “full enjoyment” of the premises, and this might indicate the need for accommodations or modifications.

TEMPORARY ACCOMMODATIONS

Temporary accommodations are accommodations that are fully approved through CAS but are approved for a limited amount of time. These are accommodations provided to students with a temporary condition (for instance, a physical condition or a concussion). To receive temporary accommodations, students still go through all CAS processes as written. The only difference is the imposed timeframe limitation.

Students approved for temporary accommodations may apply for permanent accommodations at any time. Please note:

- CAS may request additional documentation to establish the condition is permanent
- CAS may request additional meetings to discuss permanent accommodations
- Accommodations approved temporarily are not automatically approved permanently, but instead dependent on the result of the interactive process

WHO RECEIVES ACCOMMODATIONS FROM CAS?

Critical to the work that CAS does is the provision of accommodations for students with disabilities. Before going too far into the details of this process it is important to establish what is meant by “disability” and who is qualified to receive accommodations.

Disability is not something easily defined. There are legal definitions (as our office uses) and a range of other perspectives presented over time. Understanding disability requires a complex consideration of many factors. As stated within the WHO ICF Practical Manual, “The functioning of an individual in a specific domain reflects an interaction between the health condition and the contextual: environmental and personal factors. There is a complex, dynamic and often unpredictable relationship among these entities.”⁶ As highlighted, any understanding of disability needs to be centered within this dynamic and often changing interaction between an individual (identities, impairments, personal goals, strengths, etc.) and the environment (physical and digital space, culture of inclusivity, accessibility, barriers, practices, etc.).

While much of the work within CAS is focused on changing environments to ensure inclusion, the accommodation process falls within the legal realm of the ADA. Therefore, the primary definition used within our office as it relates to accommodations is the ADA definition of a disability (used by both Section 504 and HUD):

- (1) Disability - The term “[disability](#)” means, with respect to an individual—

⁴ <https://www.hud.gov/sites/dfiles/PA/documents/HUDAsstAnimalNC1-28-2020.pdf>

⁵

https://www.hud.gov/program_offices/fair_housing_equal_opp/reasonable_accommodations_and_modifications

⁶ <https://www.who.int/classifications/drafticfpracticalmanual2.pdf?ua=1>

- a. a physical or mental impairment that [substantially limits](#) one or more major life activities of such individual;
- b. a record of such an impairment; or
- c. being regarded as having such an impairment (as described in paragraph (3)).⁷

Importantly, the ADAAA did not change how this definition was worded, but it did clearly change the scope of how this definition should be interpreted. In particular, the interpretation of “substantially limits” was broadened to include a range of other potential life functions, and even this was viewed as examples and not an exhaustive list. Import to later distinctions between general accommodation processes and housing-only processes, the HUD also considers the ADAAA definition to be of primary importance in determining eligibility for accommodations.

The individual with a disability must also be a “qualified individual” to qualify for protections, and in the case of CAS, services and accommodations. Qualified in this sense is meant to clarify that students must still be able to meet essential requirements with or without accommodations. As stated in the Title II regulations:

Qualified individual with a disability means an individual with a disability who, 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, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.⁸

Similar language can be found in Section 504, where a “qualified handicapped person” is defined as “(3) With respect to postsecondary and vocational education services, a handicapped person who meets the academic and technical standards requisite to admission or participation in the recipient's education program or activity;”⁹ As with ADA if a student is not qualified, then they are not protected.

There are university requirements, but when it comes to accommodations, the specific program, department, and course also make a difference. Whether or not a student can meet essential requirements must be determined based on context specific requirements of a course, program, department, or college. As will be stated through the document, all accommodations need to be made on a case-by-case basis as the result of an individualized assessment.

TEMPORARY DISABILITIES

CAS provides accommodations to students with temporary conditions. If a student has a temporary condition or is suspected of having a temporary condition, then the student should proceed through the interactive accommodations process.

If a student had a recent accident that has resulted in the need for flexibility, then CAS recommends scheduling an appointment to start the accommodation process.

PROSPECTIVE STUDENTS AND APPLICANTS

⁷ <https://www.law.cornell.edu/uscode/text/42/12102>

⁸ https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm

⁹ <https://www.law.cornell.edu/cfr/text/34/104.3>

CAS can help prospective students and applicants explore the accommodations process and possible services on campus. CAS most commonly helps prospective students and applicants explore:

- Steps in the accommodation process
- Accommodations offered at PSU
- Accommodations commonly provided to students with specific conditions
- Documentation requirements
- Campus supports such as the [Plymouth Academic Support Services \(PASS\) Office](#), [PSU Counseling Center](#), and the [Writing Center](#).
- Commonly used Assistive Technology (AT) on campus

Prospective students and applicants who need accommodations within the admissions process should contact [Admissions](#) directly.

KEY RESPONSIBILITIES

STUDENT RESPONSIBILITIES

Students play an active role in the accommodations process and in ensuring accommodations are implemented most effectively. As such, it is important for all students to be aware of their responsibilities throughout the process.

STUDENT RESPONSIBILITIES DURING THE ACCOMMODATION PROCESS

Students are responsible for:

- ***Self-identifying as a person with a disability to receive accommodations***
To receive accommodations, students must self-identify for services. Self-identification as it relates to CAS entails providing documentation, discussing functional needs, and discussing accommodations with CAS. If students do not self-identify or specifically request accommodations, then accommodations cannot be implemented.
- ***Completing any intake requirements in a timely manner (intake, documentation, and meeting with CAS)***
The student is responsible for completing all intake materials, submitting current and comprehensive documentation, and discussing any possible accommodations with CAS. Accommodations should be requested in a timely manner. Importantly, accommodations cannot be granted retroactively.
- ***Sending accommodation letters to faculty each semester***
Students are not under any obligation to use their approved accommodations. However, to utilize accommodations, students are required to send their accommodation letters through our management system, Accommodate, to faculty each semester. Students can choose which professors will receive the letters and the approved accommodations included in each letter. It is ultimately a student's decision as to what accommodations are shared and when, but as mentioned in other sections, accommodations cannot be granted retroactively, so proactive outreach is always encouraged.
- ***Reporting any issues regarding accommodations to CAS***
If students experience issues with accommodations and how accommodations are implemented, then students are responsible for reporting these issues to CAS. CAS can assist students with resolving any issues but need to be notified of the issue, preferably as soon as the issue arises.

- **Contacting CAS directly to update accommodations**
If the student needs to update their accommodations, the student is responsible for contacting CAS. CAS must approve any additional or revised accommodations. Depending on the request, this may or may not include sending updated documentation and/or meeting with CAS. CAS may request more information to support these updates.
- **When changes or updates are made to an accommodation letter, re-sending the accommodation letters to faculty**
If accommodations are changed or updated, students are responsible for sending their letters through Accommodate to faculty again to ensure faculty have the up-to-date accommodations. Even when faculty are aware or have advocated for the potential change, the letters must be sent again. At the time of approval, CAS can help students send these letters as needed.

STUDENT RESPONSIBILITIES IN ACCOMMODATION IMPLEMENTATION

Students are responsible for:

- **Meeting with faculty to discuss specific course accommodations**
Different accommodations have different guidelines associated with them. This could include specific timelines, student responsibilities, and steps to ensuring implementation. Specifically, accommodations relating to flexibility with timelines/due dates, attendance, and participation may require discussions with professors for proper implementation.

CAS strongly encourages **all** students to reach out directly to professors to talk with them about their accommodation needs. Ideally, this should happen when the accommodation letter is sent. Many faculty members can help in ways that might not be listed within an accommodation letter (e.g., additional course flexibility the student was not aware of, instructional strategies, additional course supports). CAS encourages all students to have this conversation proactively, as this will help both students and faculty in any later conversations.

- **Coordinating with other campus providers**
Unlike in K-12 education, students are responsible for coordinating and accessing campus services. CAS can help students connect with other campus services (commonly, PASS, Psychological and PSU Counseling Center, and Health Services), but students are ultimately responsible for following through with any of these providers.
- **Reporting any formal grievances to the 504 Coordinator.**

OTHER STUDENT RESPONSIBILITIES

Students are responsible for:

- **Meeting all academic and behavioral standards within PSU more generally, but also within individual courses**
Accommodations cannot modify any essential requirements. All students must meet academic and behavioral standards set forth within the PSU Community and classrooms.
- **Communicating with and responding to communication with CAS**
Students are responsible for communicating directly with CAS. This includes responding to communications from CAS related to accommodations and the accommodations process.
- **Providing CAS with any necessary documentation updates**
Though not all students will need to update their documentation, there are situations in which updated

documentation is necessary. In those circumstances, students are responsible for providing additional documentation to CAS. Any delay in providing updated documentation could result in a delay in accommodation implementation.

- ***Providing updated contact information to CAS***

Students are responsible for providing updated contact information to CAS. This is important to ensure effective communication.

CAS RESPONSIBILITIES

Generally, within the accommodations process, CAS is responsible for:

- ***Helping students navigate the accommodation process (intake, documentation, meeting with CAS)***

CAS is responsible for helping students navigate through the accommodation process. This includes: assisting with the in-take process; safely storing, collecting, and reviewing student documentation; and meeting with students to discuss possible accommodations and the overall accommodations process. As necessary, this might also include additional meetings or meetings with other campus providers.

- ***Approving student accommodations***

CAS is responsible for approving student accommodation requests. This includes classroom, exam, housing, parking/transportation, and other accommodation requests. CAS is also responsible for helping explore flexibility requests. CAS is under no obligation to approve all accommodation requests. CAS is responsible for determining what accommodations are reasonable given the student's functional needs and the educational context. Accommodations may be denied, and reasonable alternatives may be approved. It should also be noted that fundamental alternations of essential requirements cannot be approved.

- ***Completing the accommodations process in a timely manner***

CAS is responsible for completing the accommodations process in a timely manner. CAS strives to complete the process quickly, but specific timelines are dependent on when the request was made, the nature of the request, student preparedness for the process (availability of appropriate documentation), and the time of year (CAS experiences a high volume of requests in August, September, and January).

- ***Maintaining a student record that includes safe storage of student documentation***

CAS is responsible for maintaining a student record and storing that record safely. This includes adhering to any guidance provided through USNH or campus IT services.

- ***When necessary, helping students with the process for sending letters***

CAS can provide assistance to students with sending their accommodation letters. Students are ultimately responsible for sending the letters, but CAS can help students navigate this process.

- ***Coordinating with faculty, housing, or other campus providers to ensure accommodations are effectively implemented***

Some accommodations require more outreach and coordination from CAS. This more directly includes coordination with Housing/Residential Life and with parking or UPD, but this can also include coordination with faculty members. CAS helps ensure that approved accommodations are implemented and any issues with accommodations (faculty, students, or staff who have raised concerns) are addressed.

- ***Meeting with students for accommodation updates or changes***

When students require changes or updates to their accommodation letters, CAS is responsible for meeting with the student to discuss the updates and changes. At that time, CAS will determine if additional documentation or additional meetings are necessary. This is determined based on an evaluation of each individual circumstance. For some cases, this might mean re-engaging in the

accommodations process, but for requests that are already supported this might mean simply meeting and making the appropriate change to the accommodations. When changes are made, students are still responsible for re-sending their letters.

- ***Meeting with students about potential accommodation concerns***

When a student has a concern about their accommodations, CAS is responsible for meeting with the student to better understand what the situation is, and what potential solutions there might be. If the student has a formal grievance, CAS can assist the student in connecting with the 504 Coordinator but is not directly involved in this aspect of the formal grievance process.

- ***Provide information and support to the PSU community related to accommodations, accessibility, and inclusion***

CAS is also responsible for providing broader supports to the PSU community related to accommodations, accessibility, and inclusion. While CAS might not be directly implementing these practices across the community, CAS does seek to positively influence these areas.

- ***Continually update and revise processes and practices to reflect best practices within the field***

CAS is responsible for continual updates and revisions to processes. At the very least, this should be re-evaluated yearly, but changes can be made as necessary. When possible, stakeholders should also be a part of the revision process.

- ***Provide updates to the PSU community about CAS changes***

CAS is also responsible for providing the PSU community with updates related to CAS practices. As mentioned above, CAS can and should revise processes as necessary. This should be communicated to the relevant stakeholders.

- ***Consulting with and learning from the PSU community to understand the needs of community members***

CAS is also responsible for reaching out to the community to learn from the experiences of all relevant stakeholders.

DETAILS OF THE INTERACTIVE ACCOMMODATIONS PROCESS

The accommodation process determines reasonable accommodations for an individual student. While all approved accommodations can vary, all students go through the interactive process. This process involves the following steps:

- Step 1. Student registration/student documentation submission
- Step 2. Documentation review by CAS
- Step 3. Student meeting with CAS
- Step 4. Accommodation implementation

These steps are flexible, but all the steps are done in determining a student's accommodations. This process allows CAS to explore the nature of the disability, the functional limitations, and the requested accommodations with the student directly. Please note, there may be situations in which all steps are not necessary. For instance, there could be situations related to housing accommodation requests that may differ.

A NOTE ABOUT ACCOMMODATE

Accommodate is the accommodation management system used by CAS. This is the system that students will use to register, submit documentation, view and sign CAS letters, request modifications, and much more. This system and a student guide will be provided to students.

STEP 1: STUDENT REGISTRATION AND DOCUMENTATION SUBMISSION

The first step in the accommodation process is student registration. Students are required to self-identify with CAS to receive accommodations. Students who do not self-identify are not eligible for accommodations. While CAS is more than happy to answer any questions or to schedule an appointment to meet with one of our staff, the formal accommodation process is not initiated until the student registers and submits documentation with our office.

To register students must complete the “Student Accommodation Request” form. This form is available through the [CAS website](#). The purpose of the intake form is to allow the student the opportunity to self-identify with us, submit necessary documentation, as well as provide initial information on the disability/condition that will assist CAS in guiding the student down the proper accommodation route. The intake form asks for some basic information such as:

- What the disability/condition is
- What the impact is on you as a student
- What kind of accommodations are being requested
- Information about past accommodations

Once the intake form is submitted, the student will receive an auto-generated registration confirmation email from our office. This email will include guidance on how to proceed with gathering and submitting documentation if the student has not already submitted documentation.

DOCUMENTATION

An important part of determining the nature and impact of the student’s condition is documentation. While a student can speak to and is required to speak to their condition via a self-report in the meeting with CAS, it is also important to gain additional perspective on the nature and impact of the condition. CAS must determine if the person is a qualified individual with a disability and whether a condition “substantially limits one or more major life activity”¹⁰. This is where documentation comes into play.

PURPOSE AND USE OF DOCUMENTATION

Documentation is external confirmation of a student’s condition. This information helps inform CAS about the nature of the disability and helps make the connection to how the accommodations will help address barriers a student might face. Depending on the specific process, housing-only vs other requests, the specific documentation needed varies.

GENERAL DOCUMENTATION

There are several different potential sources of documentation. CAS considers general documentation in the following ways:

- Primary sources – Primary sources are necessary in determining accommodations
 - Student self-report (during intake meeting with CAS and filling out registration form)
 - Provider support letters, IEPs, Psychoeducational Evaluations

¹⁰ <https://www.law.cornell.edu/uscode/text/42/12102>

- Secondary sources – Secondary sources are supportive in determining accommodations, but alone are not sufficient*
 - Third party reports (parents, friends, faculty, staff, etc.)
 - Individualized Education Programs (IEPs)
 - 504 Plans
 - Previous accommodation letters

*Case-by-case depends on what is included in the documents provided.

Note that currently an IEP or 504 Plan is not considered sufficient to automatically establish a disability. An IEP or a 504 plan could meet the necessary criteria as later outlined, but it does not necessarily do so. However, in addressing testing within private entities, the Title III regulations notes:

When considering requests for modifications, accommodations, or auxiliary aids or services, the entity gives considerable weight to documentation of past modifications, accommodations, or auxiliary aids or services received in similar testing situations, as well as such modifications, accommodations, or related aids and services provided in response to an Individualized Education Program (IEP) provided under the Individuals with Disabilities Education Act or a plan describing services provided pursuant to section 504 of the Rehabilitation Act of 1973, as amended (often referred to as a Section 504 Plan).¹¹

Importantly, these documents should be given “considerable weight” as they do represent previous engagement in a similar process.

OPTIONS FOR DOCUMENTATION

OPTION 1: PROVIDER VERIFICATION FORM

One pathway for submitting documentation will be through a provider verification form. This form is available on our website and can be filled out by a licensed provider who can attest to a student’s diagnoses and the impact it has on them. It also allows the provider to give recommendations for possible accommodations.

[CAS Accommodation Request - Provider Verification Form](#)

OPTION 2: SUBMISSION OF SUPPORT LETTERS, ASSESSMENTS, OR HISTORICAL DOCUMENTS (CRITERIA APPROACH)

The reality is that not all students have an active provider. For instance, some students with Learning Disabilities might have seen a provider for a neuropsychological evaluation within 5 years, but not been in contact with them since that point. In this case, the student would have access to a neuropsychological report, but not necessarily the provider themselves. Students in these situations still submit the documentation for CAS review.

REVIEW CRITERIA FOR GENERAL DOCUMENTATION

As indicated, this pathway involves reviewing documentation through a series of review criteria. The goal is to ensure consistency across reviewers and students. Review criteria, which are based on the ETS documentation guidelines¹², are as follows:

- Basic Criteria, documentation should:

¹¹ https://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm

¹² <https://www.ets.org/disabilities/documentation/>

- Be on official letterhead, dated, typed, and in English
- Be written by a licensed provider
- Must come from a professional with an existing relationship to the student
- Include information about the student diagnosis
- Include any current, objective assessment data to support the diagnosis
- Detail the functional limitations, including the severity of said limitations
- Discuss any relevant accommodation history
- Detail the connection between the functional implications and the accommodations being requested by the student
- Recency Criteria
 - ADHD, LD, ASD, ID – preferred within 5 years
 - Psychological, TBI – preferred within 1 year
 - Health, Sensory - variable depending on condition permanence

HOUSING-ONLY DOCUMENTATION

Documentation standards as outlined by HUD are different than the documentation standards within the ADA and Section 504. CAS may request documentation for housing requests to help confirm the student's condition. Within their assistance animal guidance, HUD provides a list of sources that would qualify as documentation:

- Determination of disability from a federal, state, or local government agency.
- Receipt of disability benefits or services (Social Security Disability Income (SSDI)), Medicare or Supplemental Security Income (SSI) for a person under age 65, veterans' disability benefits, services from a vocational rehabilitation agency, or disability benefits or services from another federal, state, or local agency.
- Eligibility for housing assistance or a housing voucher received because of disability.
- Information confirming disability from a health care professional –e.g., physician, optometrist, psychiatrist, psychologist, physician's assistant, nurse practitioner, or nurse.
- Documentation purchased from the internet does not meet documentation standards

PROCESS FOR HOUSING-ONLY REQUESTS

Housing-based accommodations are available to students with a documented need. CAS provides housing accommodations based on the definition of a disability from the Fair Housing Act:

The Fair Housing Act defines disability as a physical or mental impairment that substantially limits one or more major life activities. Under this definition, an impairment is a disability if it substantially limits the ability of the person to perform a major life activity such as walking, talking, hearing, seeing, breathing, etc. The definition also considers any mitigating measures such as, medications, treatments, and/or therapies in which the person is employing that may relieve the substantial limitations. If the mitigating measure(s) eliminates the substantial limitations caused by the impairment, the person does not have a disability.

Please note there is a difference between housing accommodations and housing preferences. Preferences for certain types of housing (i.e., specific residence halls, rooms, locations on campus, roommates) cannot be guaranteed. Housing accommodations are only approved for the singular student who has a disability-related need (i.e., not roommates or suitemates as well).

For any housing accommodations NOT related to an Emotional Support Animal (ESA), students and licensed providers are required to fill out the following forms:

Housing Accommodation – [Student Form](#) (to be completed by the student)

Housing Accommodation – [Provider Form](#) (to be completed by a licensed provider)

Permission to Share [Information Form](#) (to be completed by the student)

All completed forms should be returned to CAS and/or uploaded to Accommodate.

SERVICE ANIMALS AND EMOTIONAL SUPPORT ANIMALS

Definition of a Service Animal:

The Americans with Disabilities Act (ADA) defines a service animal as “any dog that is individual trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. The work or tasks performed by a service animal must be directly related to the individual’s disability. Examples of work or tasks include, but are not limited to, guiding individuals who are blind or have low vision, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, pulling a wheelchair, or retrieving dropped items for a person with limited mobility.”

If an animal meets this definition, it is considered a Service Animal regardless of whether it has been certified by a training program.

Please Note- Emotional Support or comfort animals whose sole function is to provide emotional support, comfort, therapy, companionship, therapeutic benefits, or promote emotional well-being are not Service Animals. Please see “Emotional Support Animals” for more information.

The person a Service Animal assists is referred to as a handler. The handler and animal together are referred to as a team. Service Animals are working animals, not pets. Service Animals are not required to wear any special collars, vests, or harness. You may inquire if the animal is required because of a disability and what work or task the animal has been trained to perform. You may not ask about the nature or extent of a person’s disability.

Access rights afforded to users of Service Animals comes with the responsibility of the handler to ensure compliance with all requirements of this policy, including but not limited to the following control requirements: The handler assumes full personal liability for any damage to property or persons caused by their Service Animal, and Plymouth State University shall not be responsible for any harm to a Service Animal while on campus, including but not limited to injury to the animal caused by pest management or lawn care products.

Public Etiquette by Students, Faculty, and Staff:

Individual should not:

- Engage in behavior that draws attention to the animal to disrupt the class, activity, and/or event.
- Pet a Service Animal. Service Animals are trained to be protective of their handlers and petting distracts them from their responsibilities.
- Feed a working Service Animal.

- Deliberately startle, tease, or taunt a Service Animal.
- Separate or attempt to separate a handler from their Service Animal.
- Hesitate to ask a student if they would like assistance if the team seemed confused about a direction in which to turn, an accessible entrance, or the location of an elevator, etc.

For more information, please refer to Residential Life's [Emotional Support Animal & Service Animal Policy](#).

Definition of an Emotional Support Animal:

An Emotional Support Animal (ESA) is an animal that provides emotional support and comfort to an individual with a disability. ESAs are **not** considered Service Animals under the Americans with Disabilities Act (ADA). ESAs are not trained to work or perform a task for the benefit of an individual with a disability related to activities of daily living.

Unlike a Service Animal, Emotional Support Animals are only allowed in the student's place of residence. They cannot accompany the student wherever they go. As a result, Emotional Support Animals are subject to restrictions from any areas with a no-pets policy.

For more information, please refer to Residential Life's [Emotional Support Animal & Service Animal Policy](#).

REQUESTS FOR SERVICE ANIMALS AND EMOTIONAL SUPPORT ANIMALS TO LIVE IN CAMPUS HOUSING

Per the ADA, Service Animals are permitted in all campus spaces with their handler without any formal registration process through Campus Accessibility Service. However, to request to have a Service Animal live in the residence halls or on-campus apartments, students must register their Service Animal with the Campus Accessibility Services Director, who will work with the student and Residential Life staff to ensure the rights and responsibilities of all parties are understood. Students requesting an Emotional Support Animal in their on-campus residence must complete the necessary paperwork to document the need for the animal.

ESA/Service animal approval is a two-step process:

1. Reasonableness: Campus Accessibility Services (CAS)- Individuals who wish to bring an ESA or service animal to campus must first obtain confirmation of a reasonable accommodation through Campus Accessibility Services. CAS will send confirmation to the Office of Residential Life once processed.
2. Animal Health and Policy Adherence- Residential Life- Once confirmation is received, the Housing Coordinator will email the student a link to the Service/Support Animal Housing Application. This online application is needed to confirm the health of the animal and acknowledgment of policies.

Requests for an ESA should be made as early as possible. Review of requests may take up to 30 days.

For more information, please refer to Residential Life's [Emotional Support Animal & Service Animal Policy](#).

Documentation Requirements:

Documentation is required to establish that the ESA is necessary for the student to live in University housing:

Housing Accommodation Request – [Student Form](#)

Housing Accommodation Request – [ESA](#)

The student may be asked to provide an authorization to allow Campus Accessibility Services to communicate directly with the third-party provider. Please see the [Permission to Share Information Form](#) for more information.

STEP 2: CAS DOCUMENTATION REVIEW

No matter what accommodations students are requesting or how students choose to share documentation, the process for reviewing the documentation will remain the same across all students. This will ensure consistency and equity across students. Though the specific content being reviewed might be different, every effort will be made to ensure consistency. We utilize this documentation to determine reasonable accommodations that provide access to the whole student experience.

Accommodations are defined as personalized supports that remove specific barriers with the goal of ensuring an individual can meet essential requirements or perform their job duties. Accommodations are determined on a case-by-case basis through an interactive process. The purpose of accommodations is not to change the standards or alter requirements, but instead provide different means of access to the individual.

REVIEW OF DOCUMENTATION THROUGH THE THREE KEY QUESTIONS

In either pathway, CAS must answer three essential questions within our review of documentation:

1. Does the student have a current disability or are they known to have a current disability?
2. Does the student have functional limitations that impact one or more major life activities?
3. Do the requested accommodations address the student's functional limitations?

Ultimately, if the documentation provided does not have clear answers to all three questions, then accommodations cannot be approved in a permanent way. That is not to say that provisional accommodations cannot be provided (more on that process below). However, without successfully answering those questions, accommodations cannot move forward.

QUESTION 1: DOES THE STUDENT HAVE A CURRENT DISABILITY OR ARE THEY KNOWN TO HAVE A CURRENT DISABILITY?

Question 1 is the key question that must be answered before proceeding with permanent or provisional accommodations. Without successfully answering question 1, accommodations cannot be provided in any way. It is a critical question because accommodations granted through CAS are specifically for students with disabilities.

To effectively answer this question, it is important to align student self-report with the documentation submitted from the provider.

Critical Considerations

- What disability does the student say they have?
- Does the documentation indicate a current disability?
- Has appropriate assessment data been shared when necessary?
- Has the diagnosis been confirmed by an objective party?

QUESTION 2: DOES THE STUDENT HAVE FUNCTIONAL LIMITATIONS THAT IMPACT ONE OR MORE MAJOR LIFE ACTIVITIES?

Once it is understood that the student has a disability, then one must understand if that disability has a functional impact on the student's life. Again, this can be interpreted broadly, but there must be a functional impact to warrant accommodations. For example, there are significant functional differences between a student who wears standard perspective glasses and a student who is legally blind. Both might have some degree of functional impact; the severity of impact makes a difference in terms of appropriateness of accommodations.

Often students will talk a great deal about the impact of their condition in the self-report. Any functional implications must be carefully considered concerning their disability.

Critical Considerations

- Is there a clear understanding of current functional limitations?
- How severe are the limitations?
- What impact do the limitations have on the student's life?
- How will the limitations impact the student's school experience?
- What barriers might the student face?
- Under what conditions does the student face the barriers?

QUESTION 3: DO THE REQUESTED ACCOMMODATIONS ADDRESS THE STUDENT'S FUNCTIONAL LIMITATIONS?

Finally, CAS must be able to relate the requested accommodations to the student's functional limitations. In the absence of this connection, accommodations might not actually meet the need the student has expressed. Generally, students are able to make the connection with their self-report, but it is important for the request to connect the potential supports with the functional limitations. Accommodations cannot fundamentally alter an experience, program, or goal. This means there must also be an exploration of possible alternatives for addressing a student's functional limitations.

Critical Considerations

- What accommodations are being requested?
- How are barriers effectively addressed?
- Has the student had the accommodations in the past, and have they been successful?
- Is there any reason to believe the request might be unreasonable (fundamental alteration, undue burden, safety threat)?
- Have potential alternatives been explored?

CAS must carefully consider the connections between approved accommodations and a student's functional limitations to maintain the academic and technical standards of courses, programs, and policies at PSU.

SUFFICIENT DOCUMENTATION

When documentation is deemed sufficient to establish the need for accommodations, then CAS will proceed to the next step in the process. Depending on when the student submits their documentation it could be:

- Step 3: Student Meeting – if review is completed before this stage, this will be communicated to the student in the meeting and accommodations will be discussed and approved or provide explanations for any accommodations not approved.
- Step 4: Implementation – CAS will communicate the approved accommodations to the student and necessary campus partners.

Most commonly, when documentation is determined to be sufficient, CAS simply proceeds to the next step for accommodation approval. This could be a student meeting or the approval stage, depending on where the student is within the process when the documentation is reviewed.

INSUFFICIENT DOCUMENTATION

There are times when documentation will be deemed insufficient to establish the need for accommodations. The goal of having the provider verification form is to help reduce the number of times that might be the case, but no matter the pathway this can occur. Documentation can be deemed insufficient for many reasons. To ensure equity through the process, decisions about whether documentation is insufficient should be made using the criteria previously discussed.

It is ultimately the student’s responsibility to acquire documentation, but CAS can assist in this part of the process. At the discretion of the CAS staff member, CAS could take the following steps:

- Send students the criteria for appropriate documentation
- Arrange to meet with the student to discuss documentation
- With the permission of the student, connect with a provider to clarify submitted documentation

NOTIFICATION OF INSUFFICIENT DOCUMENTATION

When documentation is insufficient CAS will either discuss documentation directly with the student in a meeting (see below for types of meetings) or send an email indicating:

- Why the documentation is not sufficient
- Steps to take to acquire sufficient documentation
- Link to our criteria and supportive information
- Information about the grievance process

STEP 3: STUDENT AND CAS MEETING

CAS meets with students for various reasons. Students meet with CAS to explore potential accommodations, learn about various resources on campus, finalize implementation of accommodations, and general accessibility questions.

MEETING CONTENT

General Accommodation Process Exploration

- How do accommodations work in higher education?
 - Differences between K-12 and higher education
 - ADA and Section 504
 - Accommodations vs Modifications

- Importance of self-advocacy
- Accommodation letters
- How does the process work at PSU?
 - Student registration
 - Documentation
 - Accommodation approval process
 - Accommodate
 - Accommodation letter processes
 - Grievance process

CAS Process Exploration

- What is the role of CAS during the accommodation process?
 - Accommodation approval
 - Documentation review
 - Assistance sending initial letters
- What is the role of CAS after the accommodation process?
 - Accommodation revisions
 - Connection to key resources
 - Assistance sending letters as needed
 - Collaboration with faculty

Documentation Exploration

- What documentation needs to be submitted?
 - PSU documentation forms
 - Self-report
- What other supporting documents can be submitted?
 - Individualized Education Programs (IEPs)
 - 504 Plans, Information from parents or friends
 - Information from other PSU offices
- How will documentation be reviewed?
 - Three key questions
 - Review criteria
 - Role of documentation vs. self-report
- Nature of the Condition
 - What is the specific condition?
 - When was the condition diagnosed?
 - Is it a chronic condition?
 - How severe is the condition?
- Functional Impact
 - How does the student report that these functional limitations impact their PSU experience?
 - What areas of function are impacted by these limitations?
 - How severe are the limitations?
 - What contexts (classroom, housing, etc.) are impacted by these limitations?

Barrier Exploration

- Nature of the Barrier
 - What academic barrier is the student facing?
 - How often do they experience the barrier?
 - How is the student's condition related to the barrier?
 - Are these barriers the same in each type of class or content area?
 - Are these barriers in non-academic contexts?
 - Have they addressed the barrier before in other ways?
 - What are they able to do when experiencing the barrier?
- Current/Anticipated Context
 - What courses are they taking?
 - What are they required to do within their courses?
 - Do they have any placements or fieldwork?
 - Have they already spoken with faculty?

Exploration of Accommodations

- Accommodations
 - How could these barriers be addressed?
 - How have these barriers been addressed previously?
 - What current strategies do they use to overcome possible barriers?
 - What accommodations are being requested?
 - Have they had these accommodations in the past?
 - Are there alternative accommodations that should be explored?
 - Are there additional accommodations that might benefit the student?

NEXT STEPS AFTER AN ACCOMMODATION MEETING

There are multiple possibilities for a student's next steps after meeting with CAS depending on what is determined during the meeting. These next steps could include:

- Gathering and providing CAS with additional documentation
- Contacting CAS to schedule any exams that they would like to take in our office
- Contacting their professors if needing to utilize specific accommodations including diagnosis related absences or limited extensions on assignments
- Submitting a Semester Request through Accommodate at the start of a new semester

STEP 4: IMPLEMENTATION

Once a student is determined to be eligible for accommodations (the student has officially made a request, the student has registered with CAS, documentation has been reviewed, and the student has met with CAS), the next step is to officially approve the accommodations for the student.

ACCOMMODATION APPROVALS

Accommodations are ultimately approved through careful consideration of all the information shared by the student. Because of this, all requested accommodations should be considered on an individual, case-by-case basis, and all requests should be investigated to see if they are reasonable.

Student accommodations are considered through the following guiding questions:

- What accommodations are being requested?
- Does the request constitute a modification (fundamental alternation)?
- Is there any reason to believe the accommodation would not be reasonable (threat to safety or undue burden)?
- Are the accommodations already offered at PSU?
- Are there any other reasonable alternatives to the requested accommodations?
- Would the accommodation likely help eliminate a barrier posed by the student's functional limitations?

If the requested accommodation is determined to be reasonable, CAS will officially approve this accommodation and add the accommodation to the student's record. The student can then share their approved accommodations with their faculty.

STUDENT APPROVAL CONFIRMATION EMAIL

When accommodations are officially approved, CAS will either discuss the approval within a student meeting (see above for meeting types) or send out a templated email via Accommodate that details:

- Approved accommodations
- How to send their accommodations to faculty
- Resources relevant to their accommodations

ACCOMMODATION DENIALS

Though a student might be found to be eligible for accommodations, that does not mean that all accommodations will be approved. Some accommodations are denied when one of the following conditions occur:

- The accommodations are deemed to be unreasonable. This occurs if the request:
 - Fundamentally alters an essential element of the university's program/activity; and/or
 - Results in an undue financial or administrative burden.
- After the documentation is reviewed, the documentation is deemed to be insufficient
- Reasonable alternatives are readily available

Note that the intent of ADA is never to deny reasonable accommodations. When accommodations are deemed unreasonable, there should be solid justification that in the individual case, based on research and inquiry, the accommodation was unreasonable based on one of the above criteria.

STUDENT NOTIFICATION OF DENIAL

When an accommodation is not approved, CAS will:

- Provide a rationale to students via email that details why the accommodation was not approved
- Provide information related to next steps the student can take
- Encourage the student to meet with CAS again for any questions, comments, or concerns

Providing students with next steps is particularly important. Students should be given the opportunity to remedy any issues that might have come up, and, in the case of an accommodation that cannot be approved, there should be a discussion of possible alternatives.

PROVISIONAL SUPPORT APPROVAL

There are circumstances where students might submit documentation that is insufficient for full approval but is sufficient for provisional approval. Some important things to note about provisional supports:

- Provisional supports are approved solely at the discretion of CAS and are not intended to be permanent accommodations
- Provisional supports can only be approved for 1 semester
- During the approved semester, students are required to share sufficient documentation with CAS
- If the student does not submit additional sufficient documentation (no additional documentation, additional documentation is still insufficient), then the student will not be able to access accommodations or provisional supports

This approval is granted solely at the discretion of CAS, and it is important to note that students who have provisional supports do not have the same status as students who have been fully approved for accommodations.

WHEN ARE PROVISIONAL SUPPORTS INAPPROPRIATE?

Before talking about appropriateness, it is important to talk a bit more about when provisional approval is not appropriate. It should be noted that provisional is not the same as temporary accommodations. Temporary accommodations are approved accommodations but limited to a specific timeframe.

To approve a student provisionally, CAS must be able to answer if the student has a current disability. In short, the student must be a qualified individual with a disability. If this cannot be established, then provisional supports cannot be provided.

While most services can be considered for provisional approval, CAS does not consider all services available provisionally. Of course, all student requests are taken on a case-by-case basis as a result of the individualized assessment, so there could be special circumstances where exceptions can be made, but generally the following are not approved provisionally:

- **Housing accommodations**
Provisional supports cannot be granted for housing only requests. Housing placements generally apply for one year and therefore would not then qualify for the one semester limit. Any provisional housing accommodation could represent a significant disruption to the student experience if granted and removed during the school year. Additionally, many housing accommodations, such as placement accommodations, are subject to limited availability and flexibility, and must be prioritized.
- **Priority registration**
As with housing services, priority registration by definition extends across multiple semesters. Provisional supports are only approved for the duration of one semester.
- **Flexibility agreements**
These agreements necessarily involve the potential modification of classroom requirements. As such, these should only be provided to students who are officially approved for accommodations. Additionally, CAS can still encourage and help students self-advocate for flexibility within their courses as an alternative.
- **Reduced courseload**
As with priority registration, taking a reduced courseload will necessarily impact not only the immediate

semester, but future semesters as well. Qualification for reduced course load can only occur if there is a clear and apparent need for the student to take less courses as related to the student's specific condition.

- **Personnel supports (reader, scribe, CART, ASL)**

These supports tend to be provided at a significant cost to the university. Without full confirmation of condition, these types of supports would likely be unreasonable. Additionally, there may well be reasonable alternatives available.

Once again, all student requests are handled on a case-by-case basis so there could be an instance where one of these things were approved provisionally. Students who would like these provisional supports approved as accommodations will be given every chance to submit additional documentation for permanent approval.

FOLLOW-UP REMINDERS ABOUT PROVISIONAL APPROVAL

To ensure students can submit additional documentation, reminder emails about their provisional status and how to fix any documentation issues will be sent periodically throughout the semester. Each email will include directions on submitting additional documentation and information about how to reconnect with CAS as needed.

STEP 6: ACCOMMODATION IMPLEMENTATION

Accommodations are primarily implemented by faculty, housing, parking, or other relevant campus providers. While CAS does assist these individuals in providing the accommodations, CAS does not always directly implement accommodations. Processes for implementation vary depending on the type of accommodations.

ACADEMIC ACCOMMODATIONS

Academic accommodations are primarily communicated by students to faculty through accommodation letters. While some accommodations may require direct outreach by CAS (for instance, when students need accessible materials), students are responsible for notifying their faculty about their accommodations as early as possible.

ACCOMMODATION LETTERS

The primary way that accommodations are communicated to faculty is through accommodation letters. Accommodation letters are templated letters sent by students to faculty through Accommodate. These letters contain information about your CAS-approved accommodations, as well as general information faculty should be aware of. It is important to note that disability-specific information is not included in accommodation letters. Students are **not required** to share disability-specific information with faculty to receive accommodations. Students should talk directly with CAS about guidance around self-advocacy.

ACTIVATING ACCOMMODATION LETTERS THROUGH A SEMESTER REQUEST

To receive accommodations in courses, students are responsible for completing a "Semester Request" within Accommodate. Students should complete a "Semester Request" at the beginning of each semester and should be sent as close to the beginning of each semester as possible (you can send letters later, but there are no retroactive accommodations and exam accommodations should be shared at least 1 week in advance of the exam).

If a student changes courses or switches their course section, then they should complete a new semester request with the revised courses included.

Please note that for some accommodations (captions, accessible materials, interpreters, etc.) CAS may reach out proactively to faculty. This is done when an accommodation requires proactive planning and additional support from CAS. When this is the case, the student is still responsible for sending their accommodation letters to faculty.

HOUSING ACCOMMODATIONS

When a student is approved for housing accommodations, CAS will communicate this accommodation directly to housing. Please note upon approval:

- CAS will complete an online form that includes the student's name and the approved accommodation to be reviewed by the Housing Coordinator in Residential Life. It is important to note that this form only contains relevant student information and the approved accommodations. It does not include any information related to the student's specific condition.

Once approved, housing will work with the student to implement the housing accommodation. If there are issues with a housing placement, Residential Life should first be notified. The student may also contact CAS at any time to talk about their accommodations. CAS will be happy to help make the connection to housing or help clarify accommodations.

DINING ACCOMMODATIONS

When a student is approved for dining accommodations, CAS will communicate this accommodation directly to Residential Life, specifically the Director of Residential Life and Dining. Please note upon approval:

- CAS will share the student's name and the approved accommodation with the Director of Residential Life and Dining via a letter from Accommodate. It is important to note that this form only contains relevant student information and the approved accommodations. It does not include any information related to the student's specific condition.

Once approved, Residential Life and the PSU Dietician will assist in implementing the accommodation.

PARKING AND TRANSPORTATION ACCOMMODATIONS

Students approved for parking and transportation accommodations will be connected directly to the parking office.