

Ponce Health Sciences University

Reasonable Accommodation Policy and Procedures



PHSU

PONCE HEALTH SCIENCES UNIVERSITY

Tamdiu Discendum Est. Quamdiu Vivas

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Introduction

Ponce Health Sciences University (PHSU) is an institution of higher education that is committed with the well-being of the students in all aspects of their life. Our purpose is to provide services to students in accordance with “Americans with Disabilities Act of 1990” which includes changes made by the ADA Amendments Act of 2008, which became effective on January 1, 2009. Also, in compliance with the Section 504 of the Rehabilitation Act 1973.

The Reasonable Accommodation Institutional Policy is a guideline to provide services based on these laws. All applicants accepted to PHSU must be able to meet the technical standards (see recommendation for standard review) described in the PHSU Admissions Policy. PHSU is not required to modify its admissions requirements for applicants with disabilities if the prospective students are unable to meet them.

Accepted candidates that need special accommodations are responsible to contact the Office of Academic Affairs; it is the student’s responsibility to make their condition known to PHSU designated officials and to seek out assistance. The impairment must be one that substantially limits a major life activity. If you have, a psychological disability or medical condition that you believe requires modification to the standards conditions, apply for accommodations.

Purpose

To ensure equal opportunities to students with disabilities in both academic and clinical settings, providing services and support for maximizing their capabilities.

Terms Definition

- **Disability:** “Physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment.” (ADA, 2008).
- **Major life activities:** “include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.” (ADA, 2008).

- **Reasonable Accommodation:** “Modifications or adjustments to the tasks, environment or to the way things are usually done that enable individuals with disabilities to have an equal opportunity to participate in an academic program or a job.” (U.S. Department of Education, 2007).
- **Qualified individual with a disability:** “A person with disability who satisfies the requisite skill, experience, education, and other job-related requirement of the desired or held employment position and who, with or without reasonable accommodation, can perform the essential functions of the position that such individual holds or desires.” (ADA, 2008).
- **Assistive Technology:** All types of equipment and support services technology that can enable equitable access that includes equipment created, adapted or modified to be used by a student with qualified impediment to maintain, improve or increase their capabilities functional.

Reasonable Accommodation Procedure

Students with disabilities who wish to request reasonable accommodation must comply with the following:

Reasonable Accommodation Application for the **first time**:

- Complete Reasonable Accommodation Request Form and Certification of Disability form, which is available at the Office of Academic Affairs, the Counseling Center and the Institutional Web Page. ****Students must submit the application and supporting documentation on or before the deadlines established: Fall term is August 31st, for trimester programs September 30th, and during the Spring term is January 31st (for all programs)****
- With the application, the student must include any medical, psychological or other relevant evidence that reflect the student’s disability and the current functional limitations. Documentation must be recent, **shall not be more than six months** prior to the date, or the request for accommodation and/or the date received at the Office of Academic Affairs. ****Please, refer below to each condition individually for specific documentation requirements.****
- Evaluations performed by members of the student’s immediate family, until the fourth grade of consanguinity are not acceptable.

- The healthcare provider should make recommendations suitable to a professional health science program setting.
- Include evidence of prior reasonable accommodations, if any.
- Must coordinate an interview with the Rehabilitation Counselor to evaluate the student's needs.
- The application for reasonable accommodation must be submitted once the student is admitted (accepted) into the academic program. It is the responsibility of the student with a disability to request the accommodation with enough time in advance for the Reasonable Accommodation Committee to evaluate their request and submit the recommendations. The Committee will evaluate each case individually and submit recommendations in Five (5) working days after received the request. The day for the accommodation to come into effect will vary according the period necessary to evaluate and implement the accommodation and usually will take one to four weeks if all the required information is provided.
- Once the Reasonable Accommodation Committee submits their recommendations, the office of the Vice-President of Academics Affairs will notify the student, the program director and the professors about the accommodations recommended no more than 5 working days after receiving said recommendation.
- For learning disabilities, attention deficit disorder, chronic illness, physical or sensory disabilities the accommodations will be valid for two years.
- For psychological disabilities, the accommodations will be valid for one year.
- A written notification with the approved accommodations and the effectiveness period will be send to the student.

Guidelines for physical, visual and other disabilities provided by organizations like the National Board of Medical Examiners, the Association of American Medical Colleges (AAMC) for the American Medical College Admission Test (MCAT), the Educational Testing Services (ETS) and other professional organizations will be revised during the determination.

The evaluation for reasonable accommodation is made once the student is admitted (accepted) into the academic program.

Renewal of Reasonable Accommodation

- At the beginning of each academic year, those students with an active reasonable accommodation must complete the Reasonable Accommodation Request Form again with the intention of renewing their approved accommodations, as well as requesting any modification, no more later than august 31 (first semester) or January 31 (second semester). Students with accommodations with a 2-year effective period must

complete the document once the effective period is close to finish. Students with active accommodations must also present evidence of participation in at least 2 contact hours of workshops, orientations, seminars or webinars of topics related to their accommodation (betterment activities).

- The Reasonable Accommodation Committee reserves the right to request new evidence in cases it deems necessary. In case of requested new documentation, the student can ask to their healthcare provider for an updated of the clinical reports. The professional may supplement the original report with a letter describing any changes since the previous report.
- The student must wait for the Committee to extend the accommodation.
- The student must coordinate a follow-up appointment with the Rehabilitation Counselor.

****The Reasonable Accommodation Committee will not be able to proceed with a recommendation until all required documents have been received. ****

PHSU requires that the documentation come from a healthcare provider that have experience and expertise in the area related to the student's disability.

Learning Disabilities and Attention Deficit Disorder

- Reports for *Learning Disabilities and Attention Deficit Disorder* should reflect the current functional limitations of the student and include the results of a battery of psychoeducational tests (psychoeducational or neuropsychological evaluation) designed to identify these impairments.
- In addition, must be provided a clinical summary. The summary must include recommendations of specific accommodations and assistive devices needed, and how they will reduce the impact of functional limitations.

Chronic Health, Physical or Sensory Disabilities

- Reports for *Chronic Health, Physical or Sensory Disabilities* should reflect the current impact of the diagnosed condition and should indicate the prognosis of the condition.
- The report must describe any current treatment plan and include any coexisting conditions or suspected.
- In addition, clinical summary of assessment procedures that were used to make the diagnosis, history of disability, evaluation results, observations, and recommended accommodations.

Psychological Disabilities

- Reports for *Psychological/psychiatric Disabilities* should include current functional limitations and how they interfere in the educational environment. Besides, should include the severity, symptoms and prognosis.
- In addition, clinical summary of assessment procedures that were used to make the diagnosis, history of disability, evaluation results, observations, and recommended accommodations.
- Documentation should state medications or other treatment that can be affect the student functioning.

Temporary Disabilities

PHSU recognizes that individuals with temporary disabilities that are a result of injuries, surgery or short-term medical illness may need access to services and resources similar with those with permanent disabilities. An expedite process is determined for this specific cases.

Students with temporary disabling conditions that need assistance or modification in the academic setting must provide documentation from the healthcare provider for verifying the nature of the condition, expected duration and describing the accommodation deemed necessary. If the anticipated recovery date is later postponed due to a change in the student's recovery prognosis, an updated note from the provider should be requested and kept on file. This evidence must be present to the Academic Affairs Office.

The student can talk with the professors about any accommodation necessary for the duration of the impairment. If the student needs other modifications, such as accessible parking can contact the Rehabilitation Counselor for the required process. Temporary services are determined on a case by case basis. The effective date of the accommodation will vary according to the period necessary to evaluate and implement the accommodation; it will usually will take one week or less if all the required information is provided and if the resources for the accommodation are available.

Pregnancy

If medical complications from pregnancy arise, the student might become eligible for services under ADA law and can request accommodations under *temporary disability*.

Types of Accommodations

Accommodations provided must allow a student to get an opportunity to benefit from the education program equal to that of nondisabled students. Accommodations that are not consider reasonable because they impose extraordinary difficulty or burden for the institution or require fundamental changes of academic standards or coursework may be declined. The professor is not obliged to offer reasonable modifications until he/she receives the written recommendations of the Office of Academic Affairs.

PHSU Reasonable Accommodations include but are not limited to the following:

- a. Didactic (classroom), exams and labs setting
 - I. Additional time for exams
 - II. Breaks during class/exams
 - III. Reduced distraction environment
 - IV. Enlarged print
 - V. Priority seating
 - VI. Special seating
 - VII. Alternative format test
 - VIII. Assistive technology (recording device, iPad, personal laptop, calculator, etc.)
- b. Clinical setting
 - I. Scheduling clerkship order
 - II. Clerkship location
 - III. Program modification (time-off for disability-related appointments, absences)
- c. Clinical Skills Exams
 - I. Additional time for patients encounters (depends on the purpose of the assessment and the barriers experienced)
 - II. Additional time for case or patient note (depends on the purpose of the assessment and the barriers experienced)
 - III. Reduced distraction environment
- d. Physical Accessibility
 - I. Elevator
 - II. Accessible parking
 - III. Ramps

Licensing, Certification and Board Exams

These exams are a critical part of professional's advancement and require additional steps for student with disabilities requesting accommodations. The student must visit the official exam webpage for the guidelines and requirements for each individual exam. If you need help, you can schedule an appointment with the Rehabilitation Counselor of PHSU. Being a Reasonable Accommodation participant at PHSU does not guarantee approval of accommodations in external entities coordinating licensing, certifications or Board Exams.

Rights and Responsibilities

a. Student

I. Rights

1. An equal opportunity to access to the courses, programs, services and activities at the university
2. Request reasonable accommodations, academic adjustments, or services
3. Confidentiality of information regarding disabilities, except as disclosures are required or permitted by law.

II. Responsibilities

1. Self-Identification as student with disability
2. Submit required documentation
3. Request accommodation
4. Meet the technical standards of the program; and the academics and institutional requirements
5. Contact the Rehabilitation Counselor if the modifications are not being implemented
6. Follow procedures for requesting and maintaining accommodations
7. If changes occur in the condition or functional status, the student will be responsible for bringing properly updated the Certification of Disability and recommendations of the specialist for the academic scenario.

b. University

I. Rights

1. Request and received current documentation about disability

2. Suggesting appropriate accommodation upon documentation submitted
 3. Deny any accommodation that fundamentally alters a course, program or activity
- II. Responsibilities
1. Keep a student record and guarantee the law provided confidentially to its documents and information
 2. Determine accommodations
 3. Assist with the implementation of the reasonable accommodation
 4. Assist student when implementations are not properly implemented
 5. Follow-up students with disabilities

Confidentiality

The ADA and Section 504 prohibit the unlawful disclosure and use of information concerning and individual's disability. The student disability records will be keep separate from the student's academic records.

Grievance and Reclamations

If the student disagrees with the recommended accommodations, he / she may appeal the decision in writing to the Reasonable Accommodation Committee in a period of five (5) working days. If the reasonable accommodation committee reaffirms an adverse decision, the student may appeal to the Chancellor on or before five working days (5).

The Chancellor will review the appeal and may appoint an Ad-Hoc Committee of three members to assess the case. The Ad-Hoc committee will provide a recommendation in a 48-hour timeframe after its appointment. The Chancellor may accept or deny the recommendations. Decisions by the Chancellor are final.

Divulgation

The Reasonable Accommodation Policy and other institutional policies can be found in PHSU Student Policy Manual and PHSU Catalog. The PHSU community can access these documents in the PHSU webpage, Public Folders (Outlook), and at the Students Affairs Office.

Information and Community Support Services

For support students with disabilities whether one choose to file an official concern, students are encouraging to obtain information, support and counseling, both on and off campus. Information, support and advice are available (see resources below) for anyone in PHSU community.

Campus Resources

Reasonable Accommodation Committee

Grace M. Morales Mercado, MSS, LRC
787-840-2575 Ext. 2252
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jarroyo@psm.edu

Counseling Services

José Soto-Franceschini, PhD, CPL
787-840-2575 Ext. 5852
jsoto@psm.edu

Community Liaison and Diversity Officer

Waleska Rodríguez Millán
787-840-2575 Ext. 4739
wrodriguez@psm.edu

Compliance Officer

Waleska Murphy
787-840-2575 Ext. 4737
wmurphy@psm.edu

Wellness Center

Ponce Health Sciences University
787-812-2525

Community Resources

Oficina del Procurador de las Personas con Impedimentos (OPPI)

PO Box 41309
San Juan, PR 00940-1309
787-725-2333

Administración de Rehabilitación Vocacional (ARV)

PO Box 7871
Ponce, PR 00732-7871
787-842-6122; 787-268-3735 (TTY)

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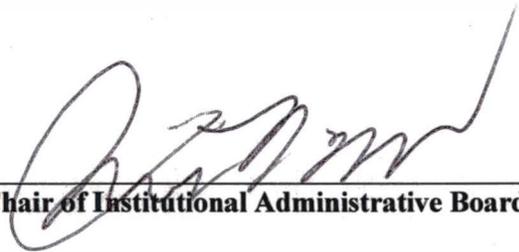
Amendments

An amendment to this policy may be recommended by the Reasonable Accommodation Committee based on regulatory changes of the ADA guidelines. The Institutional Administrative Board will have the responsibility to approve the recommendations for amendments.

Repeal and Validity

This policy does not repeal the provisions established by other policies such as the Technical Standards, the Satisfactory Academic Policy, or the Graduation Requirements among others but rather offers specific provisions to comply with "Americans with Disabilities Act of 1990" which includes changes made by the ADA Amendments Act of 2008, which became effective on January 1, 2009. Also, in compliance with the Section 504 of the Rehabilitation Act 1973.

Approval



Chair of Institutional Administrative Board

Feb 19/2021
Date