

# **Disability Accommodations Policies and Procedures**

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# **CCU ADAAA Accommodations Contact Information:**

**Coordinator of Student Success Services:** 

accommodations@ccu.edu 303-963-3310

Life Directions Center College of Undergraduate Studies Colorado Christian University

www.ccu.edu 303-963-3010

## **Equal Access Statement**

Colorado Christian University (CCU) is committed to providing reasonable accommodations to students with disabilities in order to provide all students equal access to academic programs and the university experience. Individuals will not be discriminated against on the basis of disability or be denied equal access and reasonable accommodation to the educational opportunities and student life experiences available at CCU. It is the responsibility of the student to make a disability status and need for accommodations known to the Coordinator of Student Success Services in the Life Directions Center (LDC). CCU is unable to lower program requirements, provide individualized supervision, or make modifications or substitute courses if the modification or substitution would fundamentally alter the learning objectives of the educational program. Additionally, requirements that are essential to earning a degree cannot be waived.

## **Qualified Individual**

A qualified individual under ADAAA/Section 504 must have a physical or mental impairment which substantially limits one or more major life activity. Major life activities involve but are not limited to caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. Moreover, a qualified student with disabilities must meet academic and technical standards required for admission or participation in an educational program or activity. Students are required to make their disability status and need for accommodations known to the Coordinator of Student Success Services in order to receive accommodations.

## Admissions

University admissions decisions are made without regard to disabilities. All prospective students are expected to present academic credentials that meet or exceed the minimum requirements for admission. Prospective students with disabilities are not required to disclose their disability to Admissions. However, those interested in receiving academic adjustments are encouraged to meet with the LDC Coordinator of Student Success Services for guidance regarding services.

## **Fairness**

The documentation and accommodation process is designed to identify students with legitimate needs as defined by the ADAAA/Section 504. Compliance with the ADAAA does not guarantee that an individual with a disability must achieve an identical result or level of achievement as persons without disabilities. Equal access is not the same as success. For further definition of the difference between success and equal access, contact the Coordinator of Student Success Services in the LDC. Reasonable accommodations should not decrease or alter course requirements/course objectives or reduce academic standards. Instead, they may slightly alter teaching or testing methods.

## **The Accommodations Process**

The Coordinator of Student Success Services has been designated to handle inquiries into academic accommodations for students with disabilities. The accommodation process can be lengthy; therefore, students are encouraged to reach out to the Coordinator of Student Success Services in the LDC as early as possible. The Coordinator of Student Success Services will review disability application forms on a case-by-case basis within two-three weeks of receipt of all required paperwork. Accommodations will be tailored to address the nature of the disability and the needs of the individual within the context of the requirements of the program. Accommodations are not retroactive. The Coordinator of Student Success Services will notify the student of approved accommodations and issue a Certificate of Accommodations (COA). COAs are valid for one year from the date on the COA, and then must be renewed by the Coordinator of Student Success Services. Once a COA has been issued, it is the student's responsibility to inform faculty of the accommodations for each course and submit a copy of the COA within the first three (3) weeks of the course. Students must receive new, signed copies of their COAs each semester from the Coordinator of Student Success Services. Faculty are not obligated to accommodate students with disabilities without a COA or retroactively.

## **Procedure for Requesting Accommodations**

- 1) Student completes and submits the following forms to the Coordinator of Student Success Services via the E-trieve portal and attaches relevant documentation for the disability.
  - a. Accommodations Registration Form (completed by the student)
  - b. Release of Information Form (completed by student)
  - c. Professional Verification/Documentation of Disability (provided by the student) *Any* costs incurred in securing documentation are at the expense of the student seeking accommodations.

## **Comprehensive and current documentation requirements:**

- i. <u>Documentation must be on letterhead, dated, and signed by a licensed</u>
  \*professional who has undergone appropriate and comprehensive training and experience relevant to the diagnosed disability.
  - (e.g. Physical disabilities are often verified by primary care physicians or physical therapists; meal plan accommodations are often verified by a diagnosing physician or allergist; psychological/emotional disabilities are often verified by psychologists/psychiatrists; learning disabilities are often verified by psychologists or educational diagnosticians.)
  - \*A professional should be an impartial individual who is not a family member of the student.
- Documentation must include a clearly stated diagnosis explaining how it impacts a major life activity. An indication of the severity and longevity of the condition must be included.
- iii. <u>Documentation must include the instruments and standards used to evaluate the disability.</u>



- iv. <u>Documentation must include recommendations for \*accommodations</u>. An explanation of each accommodation being requested and how lack of accommodation will substantially limit one or more major life activity of the student must be included.
  - \*The Coordinator of Student Success Services determines whether or not a recommended/requested accommodation is appropriate and reasonable.
- v. Documentation must be current for the type of disability being documented.
- 2) Upon receipt of required documentation, the Coordinator of Student Success Services will email the student that all required paperwork has been received and will then schedule an in-take meeting as needed. The Coordinator of Student Success Services will review the documentation on a case-by-case basis within two-three weeks. The Coordinator of Student Success Services will determine appropriate accommodations in order to provide the student with equal access in the student's courses.
- 3) A Certificate of Accommodations (COA) will be issued via the E-trieve system detailing the accommodations provided to the student to ensure equal access in the student's courses. The student will sign the COA and download it to share with instructors.
- 4) The student will schedule a meeting with the Coordinator of Student Success Services in the LDC to discuss accommodations and learn how to implement specific accommodations. This meeting may be combined with the initial in-take meeting.
- 5) It is the student's responsibility to provide faculty members with the COA within the first 3 weeks of each course. Accommodations are not retroactive. COAs are valid for one academic year.
- 6) A student who disagrees with the accommodations being provided may appeal the decision through the grievance policy outlined on pages 6 & 7 of this policy document.



## **Student and Faculty Rights and Responsibilities**

## **Student Responsibilities**

- Meet academic requirements to be in a course or program.
- Self-disclose your disability to the Coordinator of Student Success Services and request appropriate accommodations.
- Complete the accommodation registration process, provide documentation of disability, and receive approval of accommodations prior to requesting accommodations in the classroom.
- Provide an up-to-date and signed copy of your Certificate of Accommodation (COA) to each professor and each class in which you wish to utilize accommodations within the first three weeks of the semester.
- Schedule a meeting to discuss the nature of your accommodations with each professor.

#### **Student Rights**

- To have confidentiality of information and documentation regarding your disabilities respected
- To be treated equally with other students regarding grades and class participation
- To choose when or if you wish to utilize your approved accommodations
- To self-advocate regarding accommodation implementation to professors and the Coordinator of Student Success Services
- To submit a grievance if you believe you have been denied equal access

<u>Note</u>: Reasonable accommodations should never compromise the curriculum or essential functions of a course.

Not all accommodations listed may be needed at all times or in every class. Accommodations are intended to make CCU's education accessible to students with disabilities, but accommodations are not retroactive and do not guarantee success.

## Faculty/Staff Responsibilities

- Establish essential functions, abilities, skills, and knowledge on which all students will be evaluated for each course.
- Implement accommodations as requested in the COA and grant only approved accommodations.
- Refrain from offering accommodations retroactively or leniency requests regarding disabilities.
- Provide equal access to the learning environment and classroom materials.
- Maintain confidentiality of students with accommodations. COAs should be filed in a safe place, and faculty should refrain from discussing students' disabilities and necessary accommodations in the hearing of students or others who do not have an educational need to know. Accommodation information is protected under both ADA and FERPA.
- Consider alternate ways of assessing students that allow the students' academic abilities to be measured and not their disabilities.
- Provide necessary accommodations for exam taking or provide the exam to the Testing Center where the student can receive the approved testing accommodations.

#### Faculty/Staff Rights

- To receive a signed COA from a student for each course prior to provision of accommodations
- To participate in an informative meeting with the student regarding the implementation of reasonable accommodations
- To contact the Coordinator of Student Success Services if the accommodations alter the fundamental objectives of the curriculum
- To notify the Coordinator of Student Success Services when a student approaches the instructor directly with request for accommodation without a COA
- To direct students requesting accommodations to the Coordinator of Student Success Services
- To grade students with disabilities fairly on the basis of competencies attained and in the same manner all other students are graded

## **Grievance Policy for Disability Accommodations**

CCU prohibits retaliation against anyone who files a grievance under the grievance policy or otherwise complains that they have been denied equal access in the form of appropriate accommodations. This prohibition of retaliation similarly extends to anyone who has testified, assisted, or participated in any manner of investigation, proceeding, or hearing related to an ADAAA grievance or complaint under this policy.

CCU encourages students who disagree with a decision concerning a requested accommodation to attempt to resolve their concerns by first discussing them with the Coordinator of Student Success Services in writing. Any student who believes that a decision regarding disability accommodations has not been made in accordance with CCU stated policy may file a formal grievance with the Disability Appeal Committee. The Disability Appeal Committee consists of the Vice President of Student Life, University Counsel, and the Director of the Life Directions Center. Students must file their grievances via email to: CUSaccommodationsappeal@ccu.edu.

Grievances from students requesting accommodations will only be granted on the following grounds:

- 1. The assigned accommodations are disproportionate to the need.
- 2. The student was not accorded his or her rights, and this failure significantly affected the student's right to equal access.
- 3. The decision of the Coordinator of Student Success Services was not based on all documentation.

This formal grievance will be investigated and resolved in accordance with the following procedure:

# 1) Complete and file a grievance statement.

- a. To file a formal grievance concerning a disability accommodation decision, an individual must provide the Disability Appeal Committee with a written grievance statement via email that contains the following:
  - i. A description of the issue and any relevant facts.
  - ii. A summary of any steps the student has taken to resolve the issue, including names of people involved.
  - iii. A statement of the requested resolution, including student's rationale for any requested accommodation.
  - iv. Any supporting documentation.
  - v. Name and contact information of the person initiating the complaint.
- b. This formal grievance must be emailed to <a href="CUSaccommodationsappeal@ccu.edu">CUSaccommodationsappeal@ccu.edu</a> Attn: Disability Appeal Committee no later than thirty (30) days from the date of the decision for accommodations by the Coordinator of Student Success Services.
- 2) **Notification**: Upon receipt of a formal grievance statement, the Disability Appeal Committee or designee will initiate an investigation and notify the student via email that an investigation will be conducted.
- 3) **Investigation**: The Disability Appeal Committee may investigate the grievance through some or all of the following steps: meeting with the student, speaking with the Coordinator of Student



- Success Services or other involved parties to hear their respective positions, requesting additional medical documentation, requesting independent medical evaluation, consulting with professionals with applicable expertise, and/or any other relevant means.
- 4) **Deliberation**: The Disability Appeal Committee will have thirty (30) business days to complete an investigation once all the requirements of a grievance statement have been met and issue a determination on the grievance. If the Disability Appeal Committee is unable to issue its determination within that timeframe, the Disability Appeal Committee will advise the student. After a determination is made, a written decision will be provided to the student via email with explanations. The decision by the Disability Appeal Committee is final.

# **Specific Accommodation Policies**

## **Testing Accommodations**

To receive testing accommodations, students must follow the procedure for requesting accommodations stated above. Students should meet with their professors at the beginning of each semester to discuss how testing accommodations will be implemented. Only students who qualify for testing accommodations may test in the testing center. An accommodation for extended testing time is equivalent to time and a half according to the time allotted for students in class unless listed differently on the COA.

## Scheduling an Exam in the Testing Center Process

- Complete the <u>Test Request Form</u> in the student's E-trieve account. All requests must be submitted at least one week in advance of the exam and communicated directly with the professor.
- Upon receipt of the Test Request Form, the LDC Testing Center will schedule the exam for a 2-hour testing block that is as close to the class time as possible. Please note that class conflict is the only approved reason to be scheduled before or after your regular class time. This means that all other appointments including work or sports practice will not be considered when your testing appointment is scheduled.
- 3. The Test Request Form will then be sent to faculty inbox for approval. It is the student's responsibility to check the testing request form to see when/where the test has been scheduled and if the professor has approved it yet. The student should reach out to professors directly as needed.

It is imperative that students show up on time for their tests. If a testing appointment is missed, it is the student's responsibility to schedule a make-up exam with the professor and/or accept the consequences for missing the exam. If the student decides to take an exam in class after the Test Request Form is submitted, the student should notify the testing center at ldctesting@ccu.edu before the start of the exam.

## **Textbook Accommodations**

Colorado Christian University partners with Slingshot to provide textbooks to students. It is recommended that students requesting textbooks in accessible formats—digital or audio—acquire textbooks through Slingshot. Students may wish to purchase the ebook format of their textbooks as many of these ebooks have an audio version. Students who have been approved for audio or digital formats of their course textbooks may use the Accessible Textbook Request process (outlined below to request accessible versions).

Students may also choose to acquire their own copies of accessible versions of books, whether through Amazon, Barnes and Noble, or some other textbook source.

## Accessible Textbook Request Process

- 1. Complete the <u>ADA Text-to-Audio Book Request form</u> in the student's E-trieve account. Students need the following information to complete the form:
  - a. Course ID numbers for all courses
  - b. Titles of all textbooks
  - c. Authors of all textbooks
  - d. ISBNs of all textbooks
- 2. Attach a receipt or email confirmation indicating purchase of requested books to the eform.
- 3. After the eform is completed, staff will search for needed accessible textbooks and contact the student with instructions regarding how to download digital copies.

## **Technology Accommodations**

Student requests for technological accommodations will be assessed on a case-by-case basis. In the Testing Center, CCU uses Read&Write, Read Speaker, and Equatio for reading/scribing technologies. Human scribes and readers are also available for testing purposes.

Additional technology accommodation needs, such as captioning or speech-to-text software, can be requested via direct contact with the Coordinator of Student Success Services.

# **Housing Accommodations**

Some disabilities may require housing accommodations. CCU provides a variety of housing options for students, and students who need accommodations in their housing should complete the accommodations registration process. On the Accommodations Registration Form, students may outline needed housing accommodations, which include but are not limited to: wheelchair-accessible rooms, private bathrooms, or individual rooms. Spaces in accessible rooms may be limited, so it is important for students to submit any request for housing accommodations as early as possible so that the Department of Residence Life can accommodate the request.

New students entering university housing should submit housing accommodations requests to the Coordinator of Student Success Services no later than June 1<sup>st</sup> for students starting in the Fall, and December 1<sup>st</sup> for students starting in the Spring. Returning students who need housing



accommodations for the coming year should submit their requests no later than **one (1) month prior** to housing assignments.

Requests submitted beyond these deadlines may not be approved.

#### **Competing Housing Needs**

In cases where students have housing accommodation needs that conflict with the housing accommodation needs of another student, Residence Life may change housing assignments in order to best accommodate all students. In these cases, priority for a particular space will be given to the student who first registered for the space.

#### **Housing Accommodation Policies**

Documentation will be reviewed to determine whether the requested accommodations are reasonable. Accommodations will be developed to meet the student's medical needs and ensure equal access to university housing. The accommodations granted may not be identical to those requested by the student but will meet medical needs as documented by a medical or mental health provider.

If clarification is needed on any information in order to evaluate requested accommodations, the Coordinator of Student Success Services will engage in an interactive process, seeking clarification from the student and/or medical or mental health professionals as appropriate. University Health Services and/or Counseling and Psychological Services staff may be called upon by Disability Resources to serve in a consultative role as needed, to provide additional information about the diagnosed condition(s).

While CCU will make every effort to review request forms and documentation submitted after the deadline, we are unable to guarantee that accommodation requests will be met if the requests are received late. Please note that the provision of <u>all</u> housing accommodation requests is dependent upon housing availability.

# **Dietary Accommodations**

Students who have food allergies, Celiac disease, or other diet-related disabilities may request an accommodation by completing the accommodations registration process. Accommodations for dietary needs will be assessed on a case-by-case basis by the Coordinator of Student Success Services in conjunction with the student and the director of campus dining.

Meal plan reductions or waivers are only approved on the basis of diagnosed allergies or other related disabilities, not on the basis of preference. For many students with dietary preferences or intolerances, the dining services at CCU provide natural accommodations and a wide range of options. For those with more severe needs that cannot be accommodated in this way, students may be able to request an exemption and/or reduction to the requirement to purchase an on-campus meal plan. Students always have access to the kitchen in their own assigned living space to prepare appropriate foods as needed.

Students requesting dietary accommodations must provide verification of the allergy or medical need and proof of diagnostically valid testing from a diagnosing physician or allergist. Comprehensive and



current documentation should be provided by primary care doctors, allergists, or registered dieticians and must meet the requirements for disability documentation as specified on pp. 3 & 4.

Please note, the deadline for fully processed and approved dietary accommodations for each semester is the add/drop date. Requests submitted beyond these deadlines will not be approved for the current semester; there are no exceptions.

#### **Service and Assistance Animals**

Aside from service animals or assistance animals, the presence of animals on campus is strictly limited. No pets, except for fish in 25-gallon or less tanks, are allowed in university housing. At no time are animals, other than service animals, allowed in classrooms, event spaces, offices, dining areas, or any other CCU facility. Assistance animals may be allowed in housing areas but in no other CCU facility. The intentional misrepresentation of a service animal or assistance animal is a crime in the State of Colorado.

#### **Definitions**

#### Service Animal

A service animal refers to any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other disability. An emotional support animal does not qualify as a service animal. The work or tasks performed by a service animal must be directly related to the person's disability, including, but not limited to:

- Assisting individuals with low vision or blindness
- Alerting individuals who are deaf or hard of hearing
- Pulling a wheelchair or stabilizing a person's gait
- Retrieving items such as medicine, food, or a telephone
- Recognizing and assisting a person having a seizure
- Supporting individuals who may be experiencing flashbacks of emotional trauma

Service animals may accompany students, employees, or the general public throughout campus. When a person's disability is visible, CCU officials will not ask questions regarding the disability. If a person's disability or the work performed by his or her service animal is not visible, the individual may be asked if the presence of the animal is required because of a disability and what tasks for work the animal has been trained, or is being trained, to perform.

Students with disabilities who will require the presence of a service animal on campus are encouraged to self-identify to the Coordinator of Student Success Services and provide documentation appropriate to the presence of a service dog prior to coming on campus.

#### **Requirements for Service Animals**

1) *Training*: To work on campus, a service animal must be specifically trained to perform a service function related to a disability. While not required, the evidence of successful completion of a



recognized licensing or certification program for service animals or a letter documenting training is recommended. It is a crime to present an animal as a service animal that has not been individually trained for a specific task relating to a disability.

- 2) *Identification*: It is strongly recommended that the service animal wear a harness, cape, identification tag, or other gear that readily identifies its working status.
- 3) *Control*: The student must be in full control of the service animal at all times. The care and supervision of the service animal is solely the responsibility of the student.
- 4) Supervision: The service animal must be on a leash at all times. Exceptions will be made for service animals where a leash is not feasible. Service animals must accompany their student at all times. No service animal is allowed unaccompanied on campus. This includes being left in a vehicle.
- 5) License and Tags: All service animals must meet local, county, and/or state licensing regulations. It is recommended all animals have an owner ID tag.
- 6) Health: All animals must comply with local, county, and/or state vaccination and health requirements, including current vaccinations and immunizations against diseases common to dogs.
- 7) Clean up rule: Students must (a) always carry equipment sufficient to clean up the animal's feces whenever the animal and student are on campus (b) be responsible for the proper disposal of the animal's feces and for any damage caused by the waste or its removal.

#### **Assistance Animal**

An assistance animal provides emotional or other support that minimizes one or more identified symptoms or effects of a person's disability. This group includes therapy animals, emotional support, or comfort animals. Unlike service animals, assistance animals are not required to be trained to perform work or tasks, and they include species other than dogs or miniature horses. Reptiles may not serve as assistance animals. Assistance animals are not allowed to accompany persons with disabilities in any public or academic areas of campus including spaces within the residence halls or apartments, including but not limited to pods, stairwells, hallways, etc. In some instances, students with disabilities may be allowed to have an assistance animal within campus housing facilities inside their own assigned room or apartment with prior approval. The Assistance Animal Registration Procedure below outlines this process.

## **Requirements for Assistance Animals**

- 1) *Control*: The student must be in full control of the assistance animal at all times. The care and supervision of the assistance animal is solely the responsibility of the student.
- 2) Supervision: The assistance animal must be on a leash at all times. Exceptions will be made for assistance animals where a leash is not feasible. No assistance animal is allowed unaccompanied on campus. This includes being left in a vehicle.
- 3) License and Tags: All assistance animals must meet local, county, and/or state licensing regulations. It is recommended all animals have an owner ID tag.



- 4) Health: All animals must comply with local, county, and/or state vaccination and health requirements, including current vaccinations and immunizations against diseases common to dogs.
- 5) Clean up rule: Students must (a) always carry equipment sufficient to clean up the animal's feces whenever the animal and student are on campus (b) be responsible for the proper disposal of the animal's feces and for any damage caused by the waste or its removal.

## **Assistance Animal Registration Procedure**

Under Federal Fair Housing/Housing and Urban Development Regulations, an assistance animal may be approved to stay in a student's residence hall room or apartment. Students who wish to have an assistance animal should complete the accommodations registration process.

Documentation/verification must be on letterhead, dated, and signed by a counselor or psychologist who is trained to assess whether an assistance animal could be of benefit to the student. For assistance animal accommodations, documentation from a relevant medical or psychological professional should clearly state:

- a. Diagnosis of a disability and its implications for access to the housing and educational environment.
- b. Specific symptoms of disability that the presence of the animal will reduce, and the relationship between the animal and the symptom reduction.

After initial approval, the student will receive directions to read the CCU Service and Assistance Animal Procedures document and complete the CCU Service and Assistance Animal Registration form, providing a color photograph of the animal, and animal health documentation from a veterinarian. This form must be updated for each year the animal lives in campus housing. Roommate agreement forms will be initiated by Residence Life.

In order to best accommodate all students, the university requests that all registrations for assistance animals be approved by **July 1**st for the Fall Semester and December 1st for the Spring Semester.

Students should be aware that there are many online services that claim to provide certificates for Assistance Animals, Emotional Support Animals, or Therapy Animals. Often documentation provided by these services may not meet the standards outlined in this policy.

After all documents are received, the Coordinator of Student Success Services will review the documents, and, on a case-by-case basis, approve or deny the request for an assistance animal to live on campus. If approved, the Coordinator of Student Success Services will inform the student and the Director of Residence Life. The Director of Residence Life will then allow the student to have his or her Assistance Animal in the residence hall.

Approved Assistance Animals may be present only in the student's assigned room or apartment. They may not visit other rooms within the residence hall, nor may they be in public areas of the residence hall except when in transit to or from the student's assigned room or apartment. The animal is present in the residence hall to serve as an Assistance Animal for the approved student, not to serve as the hall



pet. Assistance Animals must be old enough to have received all appropriate vaccinations and to meet minimum behavioral standards in order not to be a nuisance or a cause of damage in the residence hall.

Assistance Animals may not be in university housing without approval from the Coordinator of Student Success Services. Students may be asked to remove their assistance animal either temporarily or permanently from university housing for any of the following reasons:

- The animal poses a threat to the health or safety of others, as determined by the Vice President for Student Life and Enrollment or his appointee.
- The animal would cause or has caused substantial physical damage to the property of the university or other residents.
- The animal's presence would pose an undue financial or administrative burden to the university.
- The animal would fundamentally alter the nature of the university's housing operations.

A student who disagrees with the decision of the Coordinator of Student Success Services regarding a request for an Assistance Animal on campus may appeal the decision through the grievance process.