

Services for Students with Disabilities Guidebook for Students

Rosalind Franklin University of Medicine and Science



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I. Disability Support at Rosalind Franklin University

At Rosalind Franklin University of Medicine and Science, students with disabilities are welcomed and supported in reaching their full academic potential. Disability is regarded as a form of the rich human diversity that we celebrate as a university. Students with disabilities should feel respected, safe, and protected in all elements of their educational experience.

All questions or concerns regarding disability support and requests for accommodations should be directed to the ADA Coordinator:

Maryanna Gibbs, Director for Academic Support
HSB L.675 847.578.3327
Ada.coordinator@rosalindfranklin.edu

II. Definition of Disability

A person with a disability is defined as any person who (1) has a physical or mental impairment that substantially limits one or more major life activities, (2) has a record of such impairment, or (3) is regarded as having such impairment (ADA, 2016).

Examples of major life activities include breathing, walking, seeing, hearing, speaking, working, learning, eating, reading, concentrating, and thinking.

III. Relevant Laws and Governing Agencies

A. Section 504 of the Rehabilitation Act (1973)

Protects the rights of persons with disabilities in programs and activities that receive federal financial assistance. The Office of Civil Rights enforces Section 504.

B. Americans with Disabilities Act (1990)

Title II

Title II of the Americans with Disabilities Act prohibits discrimination based on disability in all services, programs, and activities of state and local governments, including public universities and colleges. The Office of Civil Rights enforces Title II.

Note: Rosalind Franklin University of Medicine and Science is not a public university.

Title III

Title III applies to entities that provide public accommodations, i.e., services to the public. Private colleges and universities are covered under Title III, which is enforced by the US Department of Justice. The requirements of Title III in the educational context are similar to Section 504 and Title II.

C. Americans with Disabilities Amendments Act (2008)

This law substantially increased the number of individuals eligible for disability protection under the law by expanding the definition of disability.

Note: Section 504 and Title II and III apply to students who are qualified for an educational program. At the postsecondary level, a student is qualified if he or she is able to meet the essential academic requirements and technical standards, with or without accommodations, required for admission and participation in the program.

IV. Process for Requesting Accommodations

A. Contact Information

All requests for accommodations should be directed to the ADA Coordinator as early as possible. It is recommended that students make initial contact at least four weeks prior to matriculation to allow sufficient time for documentation review, discussion of needs, and implementation of accommodations.

The ADA Coordinator at Rosalind Franklin University is:

Maryanna Gibbs, Director for Academic Support
HSB L.675 PH 847.578.3327
Ada.coordinator@rosalindfranklin.edu

B. Requesting Accommodations

Students initiate the process by submitting the **Request for Accommodations** form (Appendix A) and all relevant documentation (see section IV.C). Students must also schedule a time to meet with the ADA Coordinator to review documentation and discuss the following considerations:

- Effects the disability has on the student in and out of the classroom
- Personal history of academic difficulty
- Personal history of using accommodations
- Strategies used to facilitate participation in and out of the classroom

Students must renew requests for accommodations with the ADA Coordinator at the beginning of each academic year. It is recommended that students contact the ADA Coordinator at least four weeks in advance of the start of each new academic year.

C. Documentation Guidelines

In most situations, a health care provider sufficiently trained to provide an expert opinion on the diagnosis must provide a detailed, comprehensive written report describing the disability and justifying the need for accommodations. Documentation should be recent enough to reflect the student's current level of functioning. If a condition has been stable for a significant period of time, a recent letter from the treating healthcare professional verifying that the older documentation is still reflective of current functioning is acceptable. The following criteria should be included in all documentation:

- Credentials of the evaluator and experience in diagnosing specific disability
- Diagnosis and the date that the diagnosis was made
- History and background of the disability
- Current status of condition (*Active, Progressing, Controlled, Remission*)
- Current level of severity (*Mild, Moderate, Severe*)
- Duration of time that the condition is likely to persist (*e.g., Lifetime, duration of program, 3 months*)
- Procedures/assessments were used to diagnose the student's condition (*Attach diagnostic results if applicable*)
- Functional limitations or symptoms of the condition, both treated and untreated
- Major life activity or activities that are substantially limited
- Circumstances that would exacerbate the disability
- Impacts of the condition (and/or current treatment) on the student's ability to learn or meet the demands of the university setting and/or clinical requirements
- Accommodations that may be necessary in order for the student to participate in university programs, activities, and services

The type of documentation required in order to establish the presence of a disability varies by disability type. For more specific information related to specific disabilities, see the table below:

Disability Category	Required Documentation
Learning	Psychoeducational testing report written by a qualified professional with expertise in learning disabilities, training in administering the tests used, and experience working with adults, such as a licensed educational psychologist, clinical psychologist, or learning disabilities specialist
Hearing	Audiology report or letter from audiologist verifying the extent of the hearing loss
Vision	Form or letter provided by a treating physician describing the type and extent of the vision limitations
ADHD	Psychoeducational testing report (see learning disability requirements), form, or written assessment from a treating professional (generally a psychologist or psychiatrist) verifying the diagnosis and describing how the symptoms substantially limit a major life activity
Psychological	Form or letter from a treating professional verifying the diagnosis and describing how the symptoms substantially limit a major life activity
Physical/Mobility	Form or letter from a treating professional verifying the diagnosis and describing how the symptoms substantially limit a major life activity

Note: Because each person's situation is unique, documentation requirements vary. The ADA Coordinator will talk to each interested student about documentation during the initial conversation. **NO STUDENT SHOULD DELAY MEETING WITH THE ADA COORDINATOR OUT OF CONCERN FOR NOT HAVING THE APPROPRIATE PAPERWORK.**

Note: Should testing be needed to determine reasonable accommodations, the cost of testing required for establishing the presence of a disability is the responsibility of the student. Psychoeducational testing can cost up to \$1500.00 so it is recommended that students budget appropriately and discuss financial arrangements with Student Financial Services.

D. Student and Faculty Notification Memos

If accommodations are appropriate, the ADA Coordinator will issue a **Student Memo** (Appendix B) that describes the approved accommodations and their terms to the student. The ADA Coordinator will also issue a **Faculty Notification Memo** (Appendix C) describing the accommodations and their terms for course/clerkship coordinators/directors. It is the responsibility of the student to submit this Faculty Notification Memo to each relevant course/clerkship coordinator/director at least two weeks prior to the need for accommodations for each course in which the student requests accommodations.

Students are encouraged to meet with individual faculty members to discuss the implementation of accommodations. It is not recommended that students disclose their actual disability to faculty members. The focus of this collaboration is to ensure that accommodations are clearly understood and do not alter the learning objectives and outcomes of the course. Discussion should focus on the accommodation, not the disability.

Note: Accommodations are NOT retroactive and may only be implemented after the request has been made and approved by the ADA Coordinator.

V. Student Rights and Responsibilities

Student Rights

Students with disabilities have a right to equal access to courses, programs, services, activities, jobs, and facilities at RFUMS. RFUMS must provide appropriate and reasonable accommodations to qualified students. Information related to a student's disability is confidential according to FERPA regulations, except in the case of an emergency or litigation.

Note: Students are not required to use their approved accommodations. Students often choose to use their accommodations in some classes and not others. A student's choice of whether to use accommodations and to what extent must be respected.

Student Responsibilities

- Provide timely notice (four weeks prior to the need for accommodations) to the ADA coordinator of a disability.
- Meet with the ADA Coordinator to discuss history of diagnosis and accommodations.
- Ensure that documentation meets the standards outlined in this guide.
- Meet the technical standards of the program.
- Notify relevant course/clerkship coordinator/director of accommodations (see Appendix C: Faculty Notification Memo) in a timely manner (at least two weeks prior to the need for accommodations) for each course in which the student requests accommodations.
- Negotiate the details of the approved accommodations with the course/clerkship coordinator/director.
- Notify the ADA Coordinator of any obstacles related to the implementation of approved accommodations or of any change in functional limitations or educational demands that would necessitate a modification to the approved accommodations.
- Renew accommodations requests prior to the start of each academic year.

VI. Accommodations in the Classroom

The following accommodations are commonly provided to students in classroom settings. Additional accommodations may be determined depending on the student's needs.

A. Additional Time for Exams

Additional time is generally approved when a student's disability affects cognitive processing speed or the physical ability to respond to exam questions in a timely manner.

B. Breaks During Exams

Some students may require additional time during an exam to take medication, check glucose levels, rest, or refocus. In this case, "stop the clock" breaks may be provided. The breaks do not add extra time to take the exam.

C. Reduced Distraction or Private Testing Rooms

Students who may be easily distracted by extraneous stimuli, such as students with ADHD, anxiety disorders, and autism spectrum disorders, may be provided an alternate testing location. Students whose disability requires them to stand, talk out loud, or use assistive technology may also be provided with a private room to avoid distracting other test takers.

D. Priority Seating

Students with low vision or hearing or students whose disability affects focus and concentration may be provided with priority seating in the classroom.

E. Other Standard Accommodations

Examples of other commonly utilized accommodations in the classroom setting include note-takers, assistive technology, adjustments to classroom attendance requirements, and lecture recordings.

VII. Accommodations in Clinical Settings

Accommodations in the clinical setting require advance planning and team collaboration. The clinical placement coordinator, the clinical program director, the student, and the ADA Coordinator work together to ensure that the student has access to all facets of the clinical experience while maintaining the integrity of all program requirements. It is beneficial for students to visit clinical sites early to get a sense of the requirements and determine in advance if there are potential barriers.

A. Clerkship Location

Considerations regarding proximity to a student's health care facility and/or transportation needs may be factored into the clerkship location assignments as an accommodation. To eliminate these barriers, students with disabilities can be given priority status in the selection process.

B. Scheduling

Students with disabilities may have special requirements related to scheduling, such as time off needed for disability-related appointments or difficulty with long or overnight shifts. In this case, accommodations regarding scheduling should be considered, as long as the requirements of the program can still be met.

C. Record Keeping

Charting and clinical record keeping using electronic medical record (EMR) systems can present a barrier to students with dyslexia, low vision, and other disabilities. Assistive technology can provide access to EMRs and other medical records. Advance planning is recommended to ensure compatibility with hospital technology. Students, the ADA Coordinator and clinical faculty need to collaborate to ensure that accommodations are appropriate and effective.

VIII. Accommodations for Standardized Exams

Students must apply for testing accommodations directly to the testing agency. Requests do not go through the ADA Coordinator, however the ADA Coordinator does offer assistance to students with the application process.

Each testing agency sets their own requirements related to documentation and timelines. It is strongly recommended that students begin to investigate these requirements early, preferably in the summer prior to the testing date. Time should be allotted for document preparation, response time from the agency, and appeals if necessary.

The table below includes recommended timelines and steps of the application process.

Note: Each agency sets their own requirements, so it is important that students verify the timeline of the agency to which they are applying.

10 Months Prior	<ul style="list-style-type: none">• Locate information about exam accommodations and note deadlines• Locate the documentation you need to submit. If updated/additional evaluations are necessary, schedule appointments as soon as possible.• Schedule an appointment with the ADA Coordinator to discuss your application.
8 Months Prior	<ul style="list-style-type: none">• Begin drafting your personal statement.
6 Months Prior	<ul style="list-style-type: none">• Ask the ADA Coordinator to evaluate your statement and review documentation.• Finalize your materials to send the testing agency.
4 Months Prior	<ul style="list-style-type: none">• Mail your materials to the testing agency. Track your package to confirm that it was received.• Identify preferred testing centers.
Upon Approval	<ul style="list-style-type: none">• Schedule your exam with your preferred testing center (depending on the requirements of your exam, this may be possible sooner).• Confirm that testing accommodations have been communicated with the testing site.

Note: Approval of accommodations at RFUMS does not guarantee that accommodations will be approved by standardized testing agencies. If you are denied accommodations and wish to appeal the decision of the testing agency, visit the website to learn more about the appeal process.

IX. Grievances and Formal Complaints

A. Internal Complaints

RFUMS does not tolerate disability discrimination within educational programs and activities. Any complaints related to disability discrimination should be directed to the ADA Coordinator. An investigation will be initiated and an appropriate resolution will be reached to prevent the recurrence and correct its discriminatory effects on the complainant and others, if appropriate. The time frame for a grievance investigation will typically take up to 60 days.

Students may also follow the Equal Employment Opportunity Policy guidelines in filing a complaint. That policy can be accessed on InSite or by clicking the link below:

<https://insite.rosalindfranklin.edu/Working@RFU/HR/Resources%20and%20Policies/Equal%20Employment%20Opportunity%20Policy.pdf#search=Equal%20Employment%20Opportunity%20Policy>

B. External Complaints

In addition to filing an internal complaint, students have the right to file a formal complaint with the Office for Civil Rights (OCR) in the Department of Education within 180 days of any alleged discrimination on the basis of disability or within 60 days of the conclusion of an internal grievance procedure (OCR, 2016).

IX. Temporary Accommodations

Students who acquire a short term disabling condition, such as an injury or temporary illness, may apply for accommodations. Documentation to verify the disability from a qualified health care provider is required. The documentation should include the diagnosis, manifestations of the diagnosis or treatment, recommendations for accommodations in the academic environment, and an anticipated end date.

X. Resources for Health Care Professionals with Disabilities

Association of Medical Professionals With Hearing Losses	https://amphl.org
Coalition for Disability Access in Health Science and Medical Education	https://sds.ucsf.edu/coalition
Office for Civil Rights, U.S. Department of Education	http://www2.ed.gov/about/offices/list/ocr/docs/howto.html
Society of Healthcare Professionals with Disabilities	http://www.disabilitysociety.org
Society of Pharmacists with Disabilities	http://www.pharmacistswithdisabilities.org
Society of Physicians with Disabilities	http://www.physicianswithdisabilities.org
U.S. Department of Justice	https://www.ada.gov/cguide.htm

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- Meeks, L., & Jain, N. R. (2016). *The guide to assisting students with disabilities: Equal access in health science and professional education*. New York: Springer Publishing Company, LLC.
- Hosterman, J. A., Shannon, D. P., & Sondheimer, H. M. (2010). *Medical students with disabilities: Resources to enhance accessibility*. Washington, D.C.: Association of American Medical Colleges.
- Office for Civil Rights, U.S. Department of Education. (2016, December). *How to file a discrimination complaint with the Office for Civil Rights*. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/howto.html>
- U.S. Department of Justice. (2009, July). *A Guide to Disability Rights Laws*. Retrieved from <https://www.ada.gov/cguide.htm>

Appendix A REQUEST FOR ACCOMMODATIONS

Today's Date:

Last Name: First Name:

Address: City/State/Zip:

Phone: Email:

Gender: DOB:

Program/Class:

Last School Attended: Graduation Date:

Disability(ies):

Accommodation(s) Requested:

History of Using Accommodations in School:

PLEASE NOTE:

Documentation of a disability should include thorough diagnostic test results; a letter from a physician, clinician, etc. merely summarizing test results will not be considered sufficient. The process of evaluating a student's request for accommodations will not commence until the student submits appropriate documentation of the disability. In some cases, evaluation of a student's documentation may take 4-6 weeks. Once approved for accommodations, it is the student's responsibility to advise the ADA Coordinator (or designee) of the continuing need for accommodations at the beginning of each academic year.

This is an official request for academic accommodation. All statements herein are presumed to be factual. Any misrepresentation of the truth may result in disciplinary action.

Appendix B

MEMORANDUM

To: Student
From: Maryanna Gibbs
Director for Academic Support
Date:
Re: Academic Accommodation

Your request for an academic accommodation has been evaluated and **approved** for the 2020-2021 Academic Year. Effective immediately, you will be granted the following accommodation:

- Accommodations listed here

PLEASE NOTE THAT THE ABOVE ACCOMMODATIONS ARE APPROVED FOR THE 2020-2021 ACADEMIC YEAR ONLY AND THAT YOU MUST RENEW YOUR APPROVAL FOR ACCOMMODATIONS BEFORE THE START THE FALL 2022 QUARTER.

Enclosed you will find your Faculty Notification Memo(s) for the current academic year. It is your responsibility to provide this memo to your faculty to request the accommodations. It is your responsibility to:

- Provide the enclosed Faculty Notification Memos to the Course/Clerkship Director/Coordinator at the beginning of the course or clerkship (or as soon as you receive approval for the accommodation) and discuss the above approved accommodations and implementation of them during this initial meeting.
- You are strongly encouraged to again discuss accommodations at least 2 weeks prior to the time that such accommodations are required.

Please consult the RFUMS Student Policies Handbook for complete policies.

Please be aware that the approval of the above accommodation is unrelated to any request for accommodations you may make for any qualifying examinations. National standards for approving accommodations may differ from those of Rosalind Franklin University of Medicine and Science; you should not assume that you will automatically be eligible for accommodations from the qualifying examiner organization for your profession.

If I can be of any further assistance with this matter, please feel free to contact me.

Appendix C

MEMORANDUM

To: RFUMS Faculty
From: Maryanna Gibbs
Date:
Re: Academic Accommodations for **NAME**

Please be aware that **NAME** has provided documentation verifying a disability that qualifies **NAME** for the following academic accommodations:

- Accommodations listed here

PLEASE NOTE THAT THE ABOVE ACCOMMODATIONS ARE APPROVED FOR THE 2020-2021 ACADEMIC YEAR ONLY AND THAT STUDENTS MUST RENEW THEIR APPROVAL FOR ACCOMMODATIONS AT THE START OF EACH ACADEMIC YEAR.

NAME has been notified that it is **NAME**'s responsibility to:

- Present this memo to you at the beginning of your course or clerkship (or as soon as he/she receives approval for the accommodation) and discuss the above approved accommodations and implementation of them during this initial meeting
- Students are strongly encouraged to again discuss accommodations at least 2 weeks prior to the time that such accommodations are required.

Please be advised that, as a University, we have specific responsibilities to provide the approved accommodation to each student as indicated. No other accommodation can be provided without full approval and each accommodation approved must be implemented with the appropriate requests from the student. Should you have questions or concerns for which I can be of assistance, please feel free to contact me at (847) 578-3327.

c: file