

BRYN MAWR COLLEGE

Guidelines for Providing Accommodations

for

Students with Disabilities



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Guidelines for Providing Accommodations for Students with Disabilities

Bryn Mawr College welcomes the full participation of individuals with disabilities in all aspects of campus life. The College is committed to providing equal educational opportunity for all qualified students with disabilities in accordance with Section 504 of the Rehabilitation Act of 1973 (504) and the Americans with Disabilities Act of 1990 as amended (ADAAA). Students with access needs due to a learning, physical, or psychological disability are encouraged to contact Access Services as early as possible for additional information and to discuss their needs.

Definition of Terms

An *individual with a disability* is a person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or has been regarded as having such an impairment.

The term *substantially limits* means the individual is restricted with regard to the condition, manner, or duration with which s/he performs a major life activity compared to most people in the general population.

With regard to post-secondary education, a *qualified person with a disability* is one who, with or without reasonable accommodation, meets the academic and technical standards for admission to or participation in an educational program, activity, or service.

Appropriate *academic adjustments* and *reasonable accommodations* refer to modifications necessary to ensure that College requirements do not discriminate against students with disabilities or have the effect of excluding students on the basis of disability. A reasonable accommodation helps to minimize, as much as possible, the limitations resulting from the disability and provides the individual with an equal opportunity to participate in College courses, programs, services, and activities. The College is *not* required to make a modification that it can demonstrate would substantially alter an essential element of a College standard, requirement, or program. Reasonable accommodations may include the elimination of physical barriers whenever possible, and academic adjustments such as the following when appropriate: the use of a calculator, recorder, or note-taker; reduced course load; alternate formats for print materials; sign language interpreting or captioning; adaptive equipment; assistive technology; and substitution of specific required courses when appropriate. Testing accommodations such as extra time, a distraction-reduced room, and word processing are also provided when appropriate.

Rights and Responsibilities

Students with disabilities that substantially limit them in the College environment have the right to . . .

- Equal opportunity to participate in the College's courses, programs, services, and activities
- Reasonable accommodations, academic adjustments, auxiliary aids and services when necessary
- Respect for their privacy regarding disability-related information, except as disclosures are required or permitted by law

Students with disabilities have the responsibility to . . .

- Meet basic requirements for admission to the College
- Satisfy essential academic requirements and technical standards of the College and their major program of study
- Disclose their disability to the Access Services Director as early as possible if they need to request accommodations
- Provide the required documentation of disability and current need for accommodations when necessary
- Follow identified procedures for requesting accommodations
- Request accommodations in a timely manner

The College, through its faculty and staff, is entitled to . . .

- Establish and maintain requirements and standards for admission to the College, and for participation in courses, programs, services, and activities
- Request current, relevant information to verify a disability and the need for reasonable accommodations, at student expense
- Require that students request accommodations in a timely manner
- Deny a request for an accommodation if the student fails to provide current relevant information verifying a disability and need for the accommodation, or the request requires a fundamental alteration of a course, program, service, or activity

The College has the responsibility to . . .

- Ensure that admissions policies and procedures are implemented in a non-discriminatory manner with regard to individuals with disabilities
- Ensure that courses, programs, services, and activities, when viewed in their entirety, are accessible to individuals with disabilities
- Provide appropriate reasonable accommodations, academic adjustments, auxiliary aids, and services in a timely manner
- Maintain appropriate confidentiality of disability-related information

Determining Eligibility and Reasonable Accommodations

Bryn Mawr provides reasonable accommodations for qualified students who disclose a disabling condition that currently causes substantial limitations to their functioning in the College environment. Decisions about eligibility and the need for reasonable accommodations are made by the Director of Access Services in collaboration with the student, and other College professionals as appropriate.

To be eligible for services and reasonable accommodations, a student must meet the following criteria:

- Have a diagnosed disability as defined by 504/ADAAA
- Disclose the disability to the Director of Access Services as early as possible
- Provide the Director with the required information verifying a disability that currently causes substantial limitations to functioning in the College environment

Determination of the need for accommodations is based on the following considerations:

- Student's description of need, current experiences, and prior history of needing accommodations in similar circumstances
- Current limitations resulting from the condition that have a substantial effect on functioning in the College environment, as identified in the documentation
- Essential course and program requirements

Please note that a prior history of accommodation does not mean that similar accommodations will automatically be provided at the College. Consideration of a student's current functioning and needs is important when confirming eligibility and determining appropriate accommodations. Also, the College is not obligated to make an adjustment that would fundamentally alter an essential element of a course, program, service, or activity. Reasonable accommodations are implemented to provide students with equal access; they do not guarantee success. Accommodations will not be implemented retroactively.

Documentation Guidelines

Students are encouraged to request accommodations and to provide the required information as early as possible to allow sufficient time for consideration and planning. Please review these guidelines for information about documenting specific types of conditions. In general, to confirm the need for reasonable accommodations, the documentation should be a typewritten report on letterhead stationery from a qualified professional not related to the student.

General Criteria for documentation prepared by third parties:

- **Credentials of the Evaluator:** Documentation must come from a qualified practitioner who is not a family member of the student. It must be printed on letterhead and include date, name, credentials, licensing, area of specialization, address and contact information
- **History of the disability:** Background information, including developmental, medical, psychological and academic history, should be included
- **Clear statement of the diagnosis:** Include current DSM-V or ICD-9 diagnosis. A description of the diagnostic criteria, evaluation methods, procedures, tests and dates of administration, as well as a clinical narrative and specific results of tests/subtests should be included. Adult norms should be used. (Please note that a diagnosis alone is not sufficient for determining accommodations.)
- **Description of current symptoms and functional limitations:** The condition's functional impact should be discussed, including severity, frequency and pervasiveness. Discuss the ways in which the condition limits a major life activity and may affect the individual's functioning in a post-secondary institution. Note that relative impairments or weaknesses, while clinically meaningful, may not necessarily require accommodations
- **Description of the expected progression or stability of the disability:** Include information about expected changes in the functional impact of the symptoms over time and context (if applicable). Information on the cyclical or episodic nature of the symptoms and known or suspected environmental triggers is important to include
- **Description of current and past treatments and accommodations:** Describe current and past auxiliary aids, assistive devices, support services and accommodations and the ways in which they have (or have not) been effective in ameliorating functional impacts of the symptoms. Please note that accommodations provided in another setting are not binding on the College
- **Recommendations for accommodations:** Accommodations are determined based on the current functional limitation(s) that result from the impairment, along with the demands of the task and the setting. They should logically relate to the functional limitations. Include a clear rationale for each accommodation. Please note that the College is not obligated to adopt recommendations for accommodations made by outside third parties.

Students should also submit verification of prior eligibility for accommodations from educational institutions and testing agencies if available, such as an IEP or 504 Plan, approval of accommodations from ETS or ACT, and a letter from their high school or previous college when relevant. Although these documents on their own are not typically sufficient to substantiate the current need for accommodations, they may provide useful information about the student's educational history.

All documentation should be submitted to the Director of Access Services as early as possible. Additional information may be necessary to substantiate the need for accommodations. If inadequate documentation is submitted, accommodations may not be arranged until the necessary information is received. It is the student's responsibility to obtain any required documentation.

Recommended documentation for specific diagnoses:

Attention Deficit/Hyperactivity Disorder and Autism Spectrum Disorder

To document an Attention Deficit/Hyperactivity Disorder (ADHD) or Autism, a student must submit a current report based on the results of an evaluation (preferably within the last three years) by a psychiatrist or licensed psychologist experienced in diagnosing ADHD or Autism in young adults and adults. The report should include the following information:

- Clear statement of a diagnosis, level of severity, and date of the most recent evaluation
- Description of the methods, criteria, and tests used to make the diagnosis
- Summary of a thorough diagnostic interview with relevant information about the individual's history, including evidence of early onset and symptoms across multiple settings
- Description of current symptoms that meet diagnostic criteria
- Analysis of evaluation results, including any relevant test data, to substantiate the diagnosis
- Ruling out of alternate diagnoses or explanations for the symptoms
- Overview of treatment plan and timeframe, including any prescribed medication and its effect on the student's current functioning
- Discussion of any symptoms that currently cause substantial limitations to the student's academic functioning
- Recommendations for reasonable accommodations to help compensate for current substantial limitations, with a rationale for each one

Learning Disability

To document a learning disability (LD), a student must submit a current report from a comprehensive psycho-educational or neuropsychological evaluation (preferably within the last three years) performed by a licensed psychologist or certified school psychologist experienced in evaluating LD in young adults and adults. Test instruments must be well recognized and age appropriate, and the most recent edition should be used. Adult norms are preferred.

At a minimum, the following areas should be evaluated:

- Cognitive functioning
- Academic achievement, including measures of reading, mathematics, and writing ability, with assessment of performance under timed and untimed conditions
- Information processing ability, including processing speed and fluency; memory; visual, auditory, and spatial perception; and executive functioning

The report should include the following information:

- List of tests administered, and an outline of all results with age-based standard scores and percentiles
- Summary of a thorough diagnostic interview including relevant educational history
- Clear statement diagnosing LD
- Data and analysis substantiating the diagnosis
- Discussion of processing strengths and weaknesses, and whether any deficits currently cause substantial limitations to the student's academic functioning
- Recommendations for reasonable accommodations to help compensate for the deficits, with a rationale for each one

Physical Disability or Chronic Medical Condition

A student with a physical disability or chronic medical condition may be required to provide current information to support a request for an accommodation or to help identify appropriate accommodations. The documentation must be a written report of an evaluation by an appropriate professional (e.g., medical doctor, physical or occupational therapist, audiologist) relating the current impact of the condition to the requested accommodations. At a minimum, information about the following should be included:

- Nature and severity of the condition, and the date of the most recent examination
- Overview of the methods used to make the diagnosis
- Summary of relevant history and current symptoms
- Discussion of any treatments, medications, or devices currently prescribed and their effect on the student's functioning
- Discussion of any manifestations of the condition that currently cause substantial limitations to the student's functioning in the College environment
- Recommendations for reasonable accommodations to help compensate for any substantial limitations resulting from the condition, with a rationale for each one
- Expected duration or progression of the condition, and time period for which the accommodations are recommended

Psychological Disability

To document a psychological disability, a student must submit a current report based on a comprehensive evaluation (preferably within the last year) performed by an appropriate professional (i.e., psychiatrist, licensed psychologist or clinical social worker) relating the current impact of the condition to the requested accommodations. The evaluation should include the following information:

- DSM diagnosis, nature and severity of the condition, and date of the most recent evaluation
- Overview of the methods used to make the diagnosis
- Summary of relevant history and current symptoms
- Overview of treatment plan and timeframe, including any prescribed medication and its effect on the student's functioning
- Discussion of any symptoms that currently cause substantial limitations to the student's functioning in the College environment
- Recommendations for reasonable accommodations to help compensate for current substantial limitations resulting from the condition, with a rationale for each one

- Expected duration or progression of the condition, and time period for which the accommodations are recommended

Procedures for Requesting Accommodations

Students who think they may need accommodations at the College are encouraged to contact the Director of Access Services as early as possible to discuss their needs and submit the necessary documentation. Appropriate accommodations may include arrangements that require advance planning, so early contact is essential. For academic accommodations and services requiring considerable advance planning and preparation, such as alternatives to print materials, ASL interpreting, or CART, it is strongly recommended that requests and any required documentation be submitted at least six weeks before the first class. If one of those services is required for an activity or event on campus, requests should be submitted as early as possible, preferably at least one week in advance.

Requests and documentation related to modifications in Residential Life should be submitted by March 1 for continuing students and June 1 for new students. For additional information, please see the next section titled *Requests for Modifications in Residential Life*.

Newly admitted students who think they may need accommodations are encouraged to contact the Director of Access Services soon after their decision to matriculate at Bryn Mawr to discuss their academic history and needs, and to learn about the process for requesting Access Services. The documentation necessary to support an accommodation request should be submitted as early as possible before the start of the academic year, in accordance with the timelines indicated previously. Early notice will help to alleviate unnecessary inconvenience and delays, and allow time to obtain any additional information if necessary.

Continuing students should contact the Director as early as possible to discuss their needs, submit any required documentation, and request accommodations when necessary, preferably before the start of the semester for which accommodations are being requested.

Eligible students requesting academic adjustments should use the following procedure each semester:

- Schedule an appointment with the Director within two weeks of confirmation of registration to review their courses and needs
- Meet with the Director to discuss whether accommodations are necessary for their courses and to prepare confidential accommodation verification forms for their faculty when appropriate.
- Meet with the professor as soon as possible to present the verification form and review the accommodations together
- Students should discuss with faculty the specific arrangements for testing accommodations, which may include modifications to previous arrangements, *no later than one week prior* to the test date. Without advance notice, it may not be possible to provide the accommodation for the scheduled test date

Continuing students who need classroom accommodations and services requiring considerable advance planning (e.g., accessible classroom locations, alternatives to print materials, ASL interpreting or CART) should submit their requests to the Director as soon as they pre-register for the upcoming semester.

Students requiring facilities access are advised to contact the Director whenever necessary, well in advance of the semester or event for which access is required.

Requests for Modifications in Residential Life

The College will consider reasonable modification of housing assignment procedures when necessary to provide equal access for students with disabilities that limit their ability to participate in residential life. Students should contact the Director of Access Services and schedule an appointment to request modifications. This should be done as early as possible to allow sufficient time for consideration and planning. Requests should be made well in advance of established Residential Life timeframes, otherwise, options may be limited:

- Returning students must submit requests and provide the required information by March 1.
- New students must submit requests and the supporting documentation no later than June 1.
- For students who wish to live on campus during the summer months, the deadline is May 1.

Requests submitted after these deadlines will be considered only if there are extenuating circumstances for the late application.

Documentation Guidelines for Residential Life Requests

Students may be required to provide current documentation of a disability or significant chronic medical condition to verify their access needs and to help determine the modifications necessary in the residential setting. All information should be submitted to the Director of Access Services and will be maintained on a confidential basis. The information must be a written report of an evaluation by an appropriate professional not related to the student (i.e., medical doctor, psychologist, physical or occupational therapist, audiologist).

The report should verify the existence of a disabling condition that currently causes substantial limitations to the student's ability to participate in residential life, and relate the current impact of the condition to the modification(s) requested. It should be on letterhead stationery, provide the date, and include the signature, title, and credentials of the professional providing the information.

At a minimum, the following information should be included:

- Nature and severity of the condition, and date of the most recent evaluation or examination
- Overview of the methods used to make the diagnosis
- Summary of relevant history and current symptoms
- Overview of any treatments, medications, or devices currently prescribed and their effect on the student's functioning
- Discussion of any manifestations of the condition that currently cause substantial limitations to the student's ability to live in campus housing
- Recommendations for reasonable modifications to provide the student an equal opportunity to participate in residential life, with a rationale and indication of the level of need for each one
- The expected duration or progression of the condition, and the time period for which the modifications are recommended

Students must complete and submit a form, *Request for Modifications in Residential Life*, which is available from Access Services. They should also submit documentation of any previous provision of modifications or auxiliary aids or services in a residential setting.

Determination of Reasonable Modifications in Residential Life

Reasonable modifications are determined by the Director of Access Services in collaboration with the Director of Residential Life, the student, and other College professionals as appropriate, based on the following considerations:

- Student's history and description of current access needs in a residential setting
- Nature and severity of the condition's impact on the student's ability to participate in residential life, as indicated in the documentation
- College policies and procedures

Policy Regarding Service Animals

In accordance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 as amended (ADAAA), Bryn Mawr College will provide reasonable accommodations for individuals with disabilities when necessary to ensure equal access to our programs, services, and activities. Although animals are not allowed in College facilities, an appropriately trained service animal, as defined below, will be permitted if necessary to ensure access for a person with a disability.

According to the ADAAA, a service animal is a dog that has been individually trained to do work or perform tasks for the benefit of an individual with a disability. The work or tasks must be directly related to the effects of the handler's disability. Other animals, whether wild or domestic, trained or untrained, are not considered to be service animals. Dogs that are not trained to perform specific tasks that mitigate the effects of a disability, including animals used for emotional support, well-being, comfort, or companionship, are not considered to be service animals.

The health and safety of Bryn Mawr's students, faculty, and staff are of utmost importance. The handler is responsible for the overall care and management of the service animal, including appropriate waste clean-up. A service animal should have a harness, leash, or other tether, unless that is not feasible due to the nature of the disability or the dog's work. If it becomes disruptive or aggressive, or is not housebroken, a service animal may be required to leave the College. Puppies who are being socialized in preparation for more formal service animal training are not considered service animals by the College, and are therefore not appropriate for the College's campus and/or housing environments.

Bryn Mawr students with disabilities who need to bring a service animal with them to the College should contact the Director of Access Services prior to their arrival, and may be asked to provide the following information:

- Verification of a disability and the need for a service animal
- A description of the specific work or tasks the dog has been individually trained to perform to mitigate the effects of the disability
- Documentation indicating that the dog has up-to-date vaccinations and appropriate licensure

Policy Regarding Emotional Support Animals

In accordance with the Fair Housing Act (FHA) and Section 504 of the Rehabilitation Act, Access Services at Bryn Mawr College engages in an interactive and collaborative process with students in order to determine eligibility for requests for reasonable accommodations to its housing policy to allow students experiencing significant mental health issues to keep an Emotional Support Animal (ESA) in-residence.

The College offers this preliminary guidance for those who are considering making a request for an ESA:

- Documentation of a significant mental health challenge and the associated need for an ESA must come from a mental health provider who knows you and understands your difficulties. The College is aware of website services that offer to create "ESA letters" for a set price, usually based only upon answers to an online survey. Such letters rarely provide sufficient documentation to support a request, and the College generally does not view them as reliable sources of information.
- The nature of communal living requires that the College consider the needs of all students in residence. Therefore, even if the College approves your request to have an ESA, it will not necessarily approve the specific animal requested. For example, most reptiles and rodents must be rejected because of safety and health concerns, as they may carry diseases which pose a threat to the general welfare of residents in a communal living environment.
- Our residence halls are generally not an animal-friendly environment. Approved ESAs will be restricted to your dorm room. They are not allowed in common areas in the residence hall, and must be crated when the owner is not in the room.
- ESAs and/or their belongings may not be washed/cleaned on the College's premises.
- Approved ESAs must not be left in the care of other residents, even for one night.
- Students bringing approved ESAs to campus are fully responsible for the ESA's behavior and for any damage caused by the ESA. If the ESA is disruptive in any manner, it must be removed within 24 hours of notice to the student.

- Requests for an ESA must be made 60 days prior to the start of a semester. If the request is made in fewer than 60 days, the College cannot guarantee that it will be able to approve a request during the semester in which the request was received.
- Generally, the presence of only one ESA will be approved per student.
- The College encourages responsible ESA ownership. Generally, dogs and cats should be spayed/neutered before bringing them to campus to live in a communal setting.

Students wishing to inquire about their eligibility to have an emotional support animal in their college residence must make an appointment with the Director of Access Services, *prior to taking any further steps*, to discuss their request and the requirements of the College's policy regarding emotional support animals in more detail. The Director will explain the complete process and procedures and distribute the necessary forms.

Disclosure and Confidentiality

Disclosure of a disability is voluntary. Disability-related information is considered confidential material and does not become part of the student's academic record at the College. It will not be released without written consent unless required or permitted by law. Information about a disability is shared with members of the campus community only with permission from the student, on a need-to-know basis.

Appeals Process

If a disagreement arises concerning requested accommodations, the student may appeal the decision of the Director of Access Services to the Dean of the Undergraduate College. This appeal must be presented in writing to the Dean within 10 working days following the decision being appealed, so that documents can be reviewed, individuals can be interviewed and remedial action, if warranted, can be taken in a timely manner. A reply from the Dean of the Undergraduate College will be provided within 20 working days or sooner, if possible. In certain cases, the time for a response to an appeal may be extended upon written consent from both parties.

Equal Opportunity Complaint Resolution Procedure

Bryn Mawr College is committed to ensuring equal access for individuals with disabilities in accordance with Section 504 of the Rehabilitation of 1973 and the Americans with Disabilities Act of 1990 as amended. When students believe they have been subjected to discrimination on the basis of disability, the following procedures are available to address their concerns. If appropriate current documentation of a disability is not on file, the student may be requested to provide it to the Access Services office.

A student who believes they have been denied equal access or a reasonable accommodation is encouraged to meet with the Director of Access Services as soon as possible to discuss their concerns and seek resolution informally. If the student prefers, or the outcome is not to the student's satisfaction, they should contact the College's Equal Opportunity Officer (EOO) no later than the end of the semester in which the situation occurred. The Equal Opportunity Officer may be reached at eoo@brynmawr.edu or 610-526-7630 (press "1" to leave a message for the EOO).

The Equal Opportunity Officer will schedule a meeting with the student as quickly as possible after being contacted. If, after consultation with the EOO and any resulting actions, the student continues to believe that disability discrimination has occurred, they should submit a written statement to the EOO within two weeks of their last contact. The statement should include an explanation of the facts relevant to the concern and the actions taken previously to resolve it, if any.

The Equal Opportunity Officer will convene an access review committee which will include appropriate administrators and faculty knowledgeable about disabilities and/or information relevant to the complaint. The committee members may communicate with the following individuals to gather pertinent information: the student, the Director of Access Services, individuals suggested by the student and others with relevant knowledge of the issues involved. The committee will render a decision which will be forwarded to the student in writing within 30 days of the committee's initial notification of the complaint. All information related to the process will be kept confidential by all parties involved.

Students who continue to believe discrimination on the basis of disability has occurred may contact the Office for Civil Rights of the U.S. Department of Education in the Philadelphia area at 215-656-8541 or OCR_Philadelphia@ed.gov.

Emergency Planning for Students with Disabilities

Students with disabilities are advised to prepare for an emergency ahead of time and to familiarize themselves with the College's [Emergency Response Guide](#). All students should know the location of exits, exit routes, stairways and elevators. Individuals who will **need assistance leaving a building during an emergency** should discuss their circumstances with the Director of Access Services as early as possible. The Director can be reached at (610) 526-7351 or dalder@brynmaur.edu.

Students with disabilities should plan ahead to make certain that emergency responders know your location, especially if you are unable to leave a building on your own. If you typically use an elevator to access a floor of a building, know that the elevator should **not** be used to exit during a fire alarm. Students are advised to carry a charged cell phone, as well.

Follow these steps, in the event of an emergency:

1. Alert others in your vicinity that you will remain in the building. Tell them where you will be. Stairwells with self-closing doors are fire-resistant and are the best places to take shelter during an emergency.
2. Direct someone nearby (ideally a responsible staff or faculty member) to tell emergency responders your location.
3. Use your cell phone to call Campus Safety, 610-526-7911, and tell them where you are located.

Students who might need assistance evacuating a building are also encouraged to give permission for the Director of Access Services to notify Campus Safety of their dorm room location. We also recommend that you give permission for Campus Safety to share the location of your dorm residence with local emergency responders in case they need to be contacted.

Students with hearing impairments who require specialty (strobe, bed shaker) fire alarms in their sleeping rooms should inform the Director of Access Services of this need when they are admitted and any time they change room assignments.