



## **POLICIES AND PROCEDURES**

|                         |                                           |
|-------------------------|-------------------------------------------|
| Policy Title            | Applicants and Students with Disabilities |
| Policy Effective Date   | February 19, 2024                         |
| Last Policy Review Date | N/A                                       |

|                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------|
| Policy Purpose                                                                                                     |
| The Applicants and Students with Disabilities Policy outlines EA's policy for review of reasonable accommodations. |

|                  |
|------------------|
| Policy Statement |
|------------------|

St. Paul's School of Nursing (Queens) is an Equal Opportunity Educational Institution and does not discriminate in the recruitment and admission of students with respect to race, color, sex, age, disability, national origin, or any other legally protected characteristic. We are committed to providing equal access and opportunities for qualified students with disabilities under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA), as amended, and ensuring compliance with all applicable laws.

Applicants for and Students in the Medical Assistant Program

Applicants, prospective, or current students with disabilities who require academic adjustments and/or auxiliary aids in connection with the admissions process, admissions testing (if applicable) and/or their program of study, should contact the Director of Student Services, or his/her designee, who will work with the individual to identify potential reasonable accommodations and academic adjustments necessary to enable him or her to fully participate in the admissions and educational processes. Questions about the process may be directed to the College President.

Applicants for and Students in the Nursing Program

Applicants, prospective, or current students with disabilities who require academic adjustments and/or auxiliary aids in connection with the admissions process, admissions testing (if applicable) and/or their program of study, should contact the Director of Student Services, or his/her designee, who will work with the individual to identify potential reasonable accommodations and academic adjustments necessary to enable him or her to fully participate in the admissions and educational processes. Questions about the process may be directed to the College President.

Accommodation Process and Documentation

Under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as amended, a disability is defined as any physical or mental impairment that substantially limits a major life activity. Having a history of impairment or being perceived as having impairment that significantly impacts a student's ability to participate in educational activities on an equal basis with their peers may also qualify one as an individual with a disability.

It is the student's responsibility to disclose his/her needs and provide appropriate documentation of the disability to the Director of Student Services, or his/her designee. All students are encouraged to self-identify and request disability-related academic accommodations prior to starting their program of study. Additionally, the College will work through this process with students at any point in their enrollment. However, please note that retroactive requests for accommodation will be denied.

### Academic Accommodation

Academic accommodations are designed to support equal access to qualified students with disabilities.

Reasonable accommodation may consist of changes in policies, practices, services, and the use of auxiliary aids or assistive devices or software. These may include but are not limited to:

- Modifying the deadline for assignments.
- Modifying the format of course materials.
- Modifying the way course information is presented; and / or
- Modifying how a student submits assignments.

Reasonable accommodation does not require a substantial change in the curriculum or result in an alteration of any essential element, outcome, or function of a course, program, service, or activity. Campus leaders understand that, upon request from a qualified student, reasonable accommodation must be made unless it can be demonstrated that the accommodation would impose an undue hardship on the operation of the program or the academic institution.

Students with disabilities are expected to complete all academic requirements for their program. Waiving or substantially altering academic requirements for program completion is not considered reasonable accommodation. This includes General Education, laboratory, simulation, clinical, externship requirements, and any other requirements considered essential to a student's program of study and/or specialization.

*Note:* An accommodation letter is provided to the student for use at his or her respective campus and to share with online instructors (if applicable). If the student is required to participate in any third-party testing, clinicals, externships, or other third-party requirements the student must request accommodations from the third party.

### Confidentiality

Campus Leaders recognizes that a student's disability documentation contains confidential information and is committed to maintaining any disability-related information as confidential as required or as permitted by law. A student's disability-related information will not be released to third parties without the student's written consent except in circumstances mandated by state or federal law.

### Complaints or Grievances

If a student would like to make a complaint related to the student's accommodation request, approved accommodation, or adherence to the accommodation, he/she is encouraged to meet with the party with whom he/she disagrees and attempt to discuss and clarify the problem. If the problem cannot be resolved, the next step is for the student to discuss it with the Campus President. If the complaint is lodged against the Campus President, the student making the complaint may contact the Vice President of Academic Affairs at [vpaa@edaff.com](mailto:vpaa@edaff.com).

Students are not required to make an informal resolution attempt. If a student wishes to file a complaint regarding any disability discrimination, the student should notify the College President. Upon receipt of the complaint, the College President will conduct a prompt investigation and determine whether there has been compliance with these policies and procedures.

If it is determined that discrimination based on disability may have occurred, the Institution will take steps proactively designed to end the discrimination, prevent its recurrence, address its effects, and provide supportive measures promptly and effectively.

## Procedure Description

### Requesting Accommodation

Identifying and implementing reasonable accommodation for a qualified student with a disability is an interactive process that includes shared responsibility between the campus and the student. *Applicants, prospective, or current students with disabilities who require academic adjustments and/or auxiliary aids in connection with the admissions process, the admissions test and/or their program of study, should contact the Director of Student Services. The Director of Student Services, in accordance with the Applicants and Students with Disabilities Policy, will work with the applicant and/or prospective student to collect the required documentation and request forms and identify reasonable accommodations and necessary to enable him or her to fully participate in the admissions and educational processes. Questions about this process may be directed to the Campus President.*

In requesting an academic accommodation, students should review and follow the steps and information below:

1. The student will self-identify as a student with a disability by contacting the Campus President, or his/her designee.
2. The student will complete the request for academic accommodation including information about the diagnosis, the requested accommodations, and information about any approved accommodations in previous academic settings.
3. The student will provide appropriate documentation from a qualified professional that verifies the presence of a disability and describes the functional limitations that may impact the students' participation in educational activities.
4. The student will submit the completed request and the Medical/Disability Documentation (from a third-party provider).
5. The Campus President, or his/her designee, in consultation with the VP of Academic Affairs and/or the VP of Nursing will review the accommodation request and all supporting documentation to assess its validity and determine the reasonable accommodations appropriate for the student when applicable.
6. Once the completed request form and all documentation are complete, the Campus President, or his/her designee, will provide the student with written notification of any approved accommodations and the faculty notification letter. This will normally be done within 2 weeks but may take longer if circumstances require.
7. The student will provide a copy of the faculty notification letter prior to the start date of each course.
8. Approved accommodation is valid for the duration of the student's program or as designated by the diagnosing physician.
9. Accommodation is approved for campus-based and online educational activities. If the student requires accommodations on externship, clinical rotations, or any activities hosted on another site, the student will need to request the accommodations from the other site.

### Appropriate Documentation

Health Condition, Mobility, Hearing, Speech, or Visual Impairment

A letter or report from the treating physician, orthopedic specialist, audiologist, otologist, speech pathologist, ophthalmologist, optometrist (as appropriate) which includes:

- Clearly stated diagnosis.
- Defined levels of current functioning and any limitations.
- Current treatment and/or medication.
- Current letter or report (within 1 year), dated and signed; and  
Necessary recommended accommodation.

### Psychological Disorder

A letter or report from a mental health professional who is impartial and not related to the student/employee, i.e., psychiatrist, psychologist, neuropsychologist, licensed professional counselor, or clinical social worker which includes:

- Clearly stated diagnosis based upon current DSM criteria.
- Defined levels of current functioning and any limitations.
- Assessment and evaluation instruments used, observations, history, etc.
- Current treatment and/or medication;
- Current letter/report (within 1 year), dated and signed; and  
Necessary recommended accommodations.

#### Traumatic Brain Injury (TBI)

A comprehensive evaluation by a physician, neurologist, licensed clinical, rehabilitation or school psychologist, neuropsychologist, or psychiatrist which includes:

- A clear statement of head injury or traumatic brain injury.
- Current impact on student's functioning and limitations.
- Cognitive and achievement measures used and evaluation results.
- Current residual symptoms and a statement regarding the student's/employee's ability to meet the demands of a postsecondary academic or work environment.
- Current treatment and/or medication.
- Current letter/report (post-rehab within 1 year), dated and signed; and
- Necessary recommended accommodation.

#### Learning Disabilities (LD)

A comprehensive evaluation report written in narrative form by an impartial individual not related to the student, i.e., licensed psychologist, psychiatrist, learning disabilities specialist, licensed professional counselor, educational therapist or diagnostician, which includes:

- Clearly stated diagnosis of a SPECIFIC learning disability in reading, math, or written language based upon current DSM criteria.
- Educational/work history documenting the impact of the learning disability.
- Alternative explanations and diagnoses are ruled out.
- Relevant test data with standard scores provided to support conclusions of the measures of intellectual/cognitive/information processing abilities by at least one of the following instruments: (a) WAIS-II or III (b) Woodcock-Johnson Psychoeducational Battery-Revised (c) Stanford-Binet IV (d) Peabody Individual Achievement Test (e) Stanford Test of Academic Skills.
- Statement of the functional impact or limitations of the disability.
- Current report (within 3 years), dated and signed; and
- Necessary recommended accommodations.

#### Attention Deficit Hyperactivity Disorder (ADHD)

A comprehensive evaluation report written in narrative form by an impartial individual not related to the student, i.e., a psychiatrist, neurologist, licensed clinical or educational psychologist, which includes:

- Clearly stated diagnosis of ADHD based upon current DSM criteria.
- Evidence of early and current impairment in at least two different environments including past and present symptoms.
- Alternative explanations and diagnoses are ruled out.
- Relevant test data with standard scores provided to support conclusions including at least one of the following instruments: (a) WAIS-II or III (b) Woodcock-Johnson Psychoeducational Battery-Revised (including Written Language) (c) Behavioral Assessment Instruments and Checklists normed on adults.
- Statement of the functional impact or limitations of the disorder and the degree to which it impacts the individual.
- Medications prescribed and how they will impact the student's ability to meet the demands of the postsecondary academic or work environment.
- Current report (within 3 years of enrollment date), dated and signed; and
- Necessary recommended accommodation.

Note: High School IEP, 504 Plan and /or letter from a physician or other professional may not be sufficient documentation. Prescription medication cannot be used to imply a diagnosis. Test and evaluation results as well as diagnostic labels are not, in and of themselves, sufficient in terms of accommodation requests. A clinician's evaluative summary of these test and evaluation results that includes the information listed above is needed. A qualified clinician is considered a professional with credentials that would generally be accepted as appropriate to diagnose the disability.

Students will use the approved accommodation letter to notify faculty of approved academic accommodations. The Director of Student Services, or his/her designee, will provide the student with the faculty notification letter. It is the student's responsibility to provide a copy of that letter to the student's faculty prior to the beginning of each course. Accommodations for texts in alternate formats, and accessible audio and video materials can take about 4-6 weeks to complete, sometimes longer. If the student is approved for any of these accommodations, the student should contact the Campus President, or his/her designee, at least 6 weeks prior to the start of the course. This will help ensure there is enough time to complete any accommodation requests prior to the start of the term.

#### Policy Responsibilities

The College President, in conjunction with academic leaders, ensures consistent application of the policy across campuses.

The Director of Student Services, or his/her designee, along with deans and directors of education and nursing, work collaboratively with students requesting accommodation, ensures accommodation is followed, and serve as the main point of contact for students.

Applicants and/or students must provide qualifying documentation of a disability, request accommodation, and engage in discussion with campus leadership about their request for reasonable accommodation.

#### Definitions

**Reasonable Accommodations:** Reasonable accommodations are 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) unless doing so "fundamentally alter" the nature of the programs or result in an "undue burden."