

Coe College

Handbook for Students with Disabilities

Introduction

Coe College is committed to equal access and nondiscrimination, in principle and in practice, for all otherwise qualified students without regard to disability. Coe College follows the policy found in *Section 504 of the Rehabilitation Act of 1973*, stating “No otherwise qualified handicapped individual shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The Academic Achievement Program (AAP) is funded through a grant from the US Department of Education and has been a part of Coe College since 1978. The Academic Achievement Program supports the mission of Coe College to ready students intellectually, professionally, and socially to lead productive and satisfying lives in the global society of the 21st century. **The Academic Achievement Program expects all students to fully participate and self-advocate at Coe College by building relationships with faculty and staff, creating strategies to achieve academically, and utilizing appropriate services.**

Goals for Providing Services to Students with Disabilities

1. To work individually with qualified students with disabilities to provide reasonable accommodations which will allow the student to demonstrate his or her academic capability at Coe College.
2. To assist qualified students with disabilities through the transition process from high school to Coe College.
3. To work collaboratively with other areas of Coe College, including faculty, to ensure equal access for all students.

Responsibilities of Higher Education Related to Legislative Mandates

The Rehabilitation Act of 1973

Title V of the Rehabilitation Act of 1973 is generally regarded as the first national “civil rights” legislation for people with disabilities.

Section 504 is a program access statute. It requires that no otherwise qualified person with a disability be denied access to, the benefits of, or be subjected to discrimination by any program or activity provided by any institution or entity receiving federal financial assistance. (*It is this mandate that has promoted the development of disability support service programs in colleges and universities over the last 20 years.*) Subpart E of Section 504 deals specifically with institutions of higher education. It requires that an institution (public or private) be prepared to make appropriate academic adjustments and reasonable modifications to policies and practices in order to allow the full participation of students with disabilities in the same programs and activities available to non-disabled students.

The Americans with Disabilities Act

Introduction

The Americans with Disabilities Act (ADA) of 1990 reinforced the provisions of the Rehabilitation Act by requiring that all public facilities, services, and communications be accessible to persons with disabilities and that auxiliary aids and services be provided unless an undue burden would result.

Who is protected?

Qualified individuals with disabilities are protected under the Americans with Disabilities Act. The definition contains two parts. First, the person must be an individual with a disability as defined under the ADA; second, that person must be otherwise qualified.

A “qualified individual with a disability” means:

1. With respect to educational opportunities, a disabled person who meets the technical and academic standards for admission or participation in an educational program or activity.
2. With respect to other services, a disabled person who meets the essential eligibility requirements for the receipt of such services.

An individual with a disability is defined as someone who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. Individuals with disabilities may include persons who are mobility impaired, cosmetically disfigured, mentally ill, mentally handicapped, emotionally troubled, or learning disabled. “Major life activities” include caring for self, performing manual tasks, walking, sitting, standing, lifting, reaching, seeing, speaking, breathing, learning, and working.

Standards of Access

The standard for access to programs and services under the ADA for public institutions is that all programs must be readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided equal services in a setting that is as integrated as possible. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment.

Academic Standards Not Affected

The ADA does not require colleges or universities to lower academic standards or fundamentally alter the nature of the programs provided. As such, reasonable accommodation does not negate requirements for successful completion of courses and programs, adherence to generally acceptable standards of behavior and the college's code of conduct, and adherence to faculty directions and instructions.

Rights and Responsibilities

Coe College neither imposes accommodations on students nor pre-empts a student's responsibility to disclose and define his or her disability and accommodation needs. Self-identifying as a student with a disability and asking for accommodations are personal decisions. If a student requests accommodations at Coe College, he or she is responsible for completing the accommodation process that begins with informing the Academic Achievement Program of the disability and the need for services. However not every impairment qualifies as a disability protected under the ADA because not every impairment is substantially limiting. In order for a person to be eligible for accommodations, the ADA stipulates that the disability must "substantially limit" a major life activity. **Although the AAP assists students with disabilities with many tasks, it is the responsibility of students to take the initiative and remain actively involved in the accommodation process.**

Student Rights

Students with disabilities have the right:

1. To full and equal access to the same educational experience as students without disabilities.
2. To have accommodation requests reviewed and authorized quickly and fairly by instructors and by the Academic Achievement Program staff.
3. To have their disability documentation be held confidentially and be released only to designated individuals with the student's written request or permission.

The procedures contained herein are not exclusive of other education-related inquiries that the college, in its discretion, may make as permitted or required by local, state, or federal law and in conformance with The Americans with Disabilities Act of 1990.

Student Responsibilities

1. To self-identify his or her disability and provide professional and appropriate documentation of the disability. (See documentation guidelines for more detailed information)
2. To consult with the Academic Achievement Program staff to discuss appropriate accommodations.
3. To consult with instructors at the beginning of each semester to discuss accommodation needs.
4. To provide timely notification of special needs and changes in accommodation needs/services.
5. To arrange exam accommodations with faculty well in advance of exam dates.

6. To notify the AAP staff if requested accommodations are not being provided or are not effective.
7. To abide by Coe College's policies regarding academic honesty and disruptive behaviors.

Academic Achievement Program Responsibilities

1. Determine, with students, appropriate academic adjustments consistent with the student's documentation.
2. Develop written policies and guidelines regarding procedures for determining and accessing "reasonable accommodations."

In determining the college's ability to offer reasonable accommodations to an otherwise qualified applicant or student with a disability, each request for an accommodation will be evaluated on a case-by-case basis. Factors to be examined include, among others, the essential academic and technical standards requisite for admission or participation in an educational program or activity; the purpose and nature of the course, program, service, or activity; the precise education-related abilities and functional limitations of the applicant or student and how those limitations could be overcome with reasonable accommodations(s); the nature and cost of the accommodation required in relation to the college's financial resources; the consequences and effect financially, educationally and otherwise of such an accommodation upon the operation and educational mission of the college, course, program, service and/or activity; and other federal, state, and local regulatory requirements.

3. Maintain confidential records that document the plan for the provision of selected accommodations.
4. Assist students with disabilities in assuming the role of self-advocate.
5. Provide instruction in learning strategies (e.g., attention and memory strategies, planning, self-monitoring, time management, organization, problem-solving).
6. Meet with prospective students and their parents/guardians to discuss services available at Coe College.
7. Establish rights and responsibilities with respect to service provisions for students with disabilities.
8. Develop and implement the disability support services for Coe College.
9. Provide consultation with faculty and staff regarding accommodations, compliance with legal responsibilities, as well as instructional, programmatic, physical, and curriculum modifications.
10. Provide disability awareness training for campus constituencies.

11. Collect student feedback to measure satisfaction with disability services and to monitor use of disability services.

Adapted from the AHEAD Program Standards.

Accommodations

What is a "Reasonable Accommodation"?

A "reasonable accommodation" is defined as any change in an environment or in the way things are customarily done that enables a qualified individual with a disability to enjoy equal opportunities. Offering reasonable accommodations is one of the requirements of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973, as amended.

Procedures

1. The student is responsible for self-identifying with the Academic Achievement Program and meeting with AAP staff to discuss accommodations that would be helpful for the student.
2. The student is responsible for providing professional and appropriate documentation as outlined in the documentation guidelines in this handbook.
3. The student requesting classroom accommodations must contact faculty members at the beginning of each new term and follow the classroom accommodations procedures outlined below. If the student applicant requires secretarial or other assistance in preparing such request due to his or her disability, this will be provided upon request.
4. If the student is determined to be non-disabled, no offer of reasonable accommodations shall be made.

Classroom Accommodations

Accommodations for qualified students provided through the Academic Achievement Program may include, but are not limited to, the following:

- **Test Proctoring**
Students can make arrangements to have their tests proctored in the Academic Achievement Program Office. Tests can be administered orally and/or test time can be extended.
- **Note Takers**
Note takers may be provided to any student who has difficulty taking lecture notes because of a documented physical or learning disability. Coe College believes that student participation is essential for a quality educational experience. This accommodation is in no way meant to replace classroom attendance.

- **Textbooks on Tape**
Arrangements can be made for students with visual impairments or learning disabilities to obtain textbooks on tape through The Commission for the Blind and Recording for the Blind and Dyslexic.
- **Tutoring**
Faculty-approved student tutors are provided in most academic areas. Tutors are available to assist students one-on-one or in a group setting. There is no charge for tutoring services.
- **Reading Skills Enhancement**
Reading skills assessment and instruction are provided by the reading specialist to help students improve their reading comprehension, speed, and vocabulary.
- **Math Skills Enhancement**
Assistance is provided for students with math skill deficiencies and anxieties. The math specialist helps students in any math-related class to overcome specific problem areas and master materials needed for subsequent coursework.
- **Study Skills**
Our staff provides assistance through one-on-one instruction and workshop programs. Audiotapes, videotapes, and books are also available in the AAP Office.
- **Transitions Program**
This is a college course designed to help students adjust to the college environment academically and personally.
- **Classroom Accessibility**
Students with mobility or physical impairments that hinder their ability to navigate to class will receive assistance from the AAP staff in order to coordinate their classroom locations to accessible spaces.
- **Support**
The faculty at Coe College are very supportive of students with special needs. If at any time a student needs assistance in obtaining an appropriate accommodation, the Academic Achievement staff will serve as an advocate.

The college is not required to offer or provide an accommodation, to admit or to continue to admit an individual with a disability to any particular course, program, or activity, or to provide educational opportunities and other services when: (i) an accommodation would substantially modify the educational standards or mission of Coe, (ii) an accommodation would fundamentally alter the nature of the program, activity, or service, (iii) taking into account the disabled student's qualifications along with the requested accommodation, he or she is not otherwise qualified to meet the academic and technical standards requisite for admission or participation in an educational program or activity, (iv) taking into account the disabled student's qualifications along with the requested accommodation, he or she is not otherwise qualified to meet the

essential eligibility requirements for receipt of other services, (v) reasonable accommodation would not overcome the effects of the individual's disability, (vi) reasonable accommodation would not enable the individual to complete a course, degree program, or activity, (vii) an accommodation would cause an undue hardship on the college, or (viii) with respect to accommodation(s) mandated by the Americans with Disabilities Act, even with the reasonable accommodation, the individual would still pose a direct threat of substantial harm to the health and safety to self or others.

Accommodation(s) will not be offered that would substantially modify the educational standards, operation, and/or mission of the college. An accommodation that would be unduly costly, extensive, substantial, or disruptive or that would fundamentally alter the nature of the course, program, service, or activity offered by the college would constitute such a substantial modification. If the college determines that an accommodation would cause substantial modifications, the applicant or student requesting the accommodation may be given the option of providing needed accommodation or paying the portion of the cost which constitutes the undue hardship or substantial modification.

Housing Accommodations

Full-time Coe College students are required to live in the residence halls and take meals in the college dining hall. The exceptions to the residency requirement are:

- 1) married students
- 2) students who will live with parents within the local commuting area, and
- 3) students who are 25 years or older

In compliance with *Section 504 of the Rehabilitation Act of 1973* and the *Americans with Disabilities Act of 1990*, Coe College students with documented disabilities may request special housing accommodations within the context of current housing policies. On-campus housing options may be made if the student's documentation indicates the *necessity* of such an accommodation. Off-campus housing permission will only be granted as an accommodation for students with disabilities if there are no on-campus alternatives that meet the needs of the individual making the request.

For any non-standard housing request to be considered, there must be a disability, which **Federal law** defines as **“a physical or mental impairment that substantially limits one or more major life activities.”** The Academic Achievement Program must have appropriate documentation with evidence of extenuating circumstances in order to consider students' requests for residential accommodations. Requests for housing accommodations will be handled on a case-by-case basis. Students requesting special housing accommodations should work first with an AAP staff member prior to requesting the accommodation with the Department of Residence Life.

Documentation Guidelines

Under the *Americans with Disabilities Act of 1990* and *Section 504 of the Rehabilitation Act of 1973*, individuals with disabilities are guaranteed certain protection and rights to accommodations based upon documentation. The documentation must indicate that the disability substantially limits some major life activity. The following guidelines are provided in the interest of accommodations, academic adjustments, and/or auxiliary aids.

- Documentation must be from a licensed professional, qualified in the appropriate specialty area for which accommodations are being requested. Submission of raw test score data would be helpful but is not required. 504 Plans and IEP's are not considered appropriate documentation.
- Documentation must be less than three years old. However, the College may use its discretion in cases in which the condition is considered permanent and the documentation is greater than three years old.
- Documentation must include specific diagnostic information (e.g., DSM-IV multiaxial diagnosis).
- Documentation must clearly state the reasonable accommodations being requested. In addition, the documentation must provide a clear rationale for each accommodation being requested. All accommodations are determined based upon the impact of disability on a student's academic performance.
- As indicated, documentation should discuss the impact of medication on the student's ability to function in an academic environment.
- As indicated, documentation should discuss the impact of other treatments on the student's ability to function in an academic environment.
- In some circumstances, it may be warranted to provide accommodations on a provisional basis; for example, if it has been established that a student has a disability but more current information on functioning is needed. Such decisions are made at the discretion of the Academic Achievement Program on a case-by-case basis.
- The college may require a student to undergo further testing and/or evaluation by medical or other personnel retained by the college to verify or establish the claimed disability and the need for accommodations and to provide a basis upon which a reasonable accommodation can be developed or implemented. The cost of such evaluation and testing will be paid by the college. All such testing and/or evaluations shall be the property of the college and will be treated as confidential.

FAQ's

1. How are services for students with disabilities at Coe College different from services provided in high school or from other institutions?

Students should not assume that accommodations provided at one school will be provided at Coe College. Accommodations are approved on a case-by-case basis and must be consistent with the College's academic goals and standards. A student's request, documentation, and past educational experiences will all be taken into consideration when determining the appropriate accommodations. Ultimately, college students are solely responsible for the success of their college career.

2. Are 504 Plans and IEP's (Individualized Education Plans) acceptable documentation of a disability at the college level?

504 Plans and IEP's are not considered acceptable documentation, but are useful in understanding prior academic experiences of the student. Testing used to document a disability must be current (usually within three years) and administered by a qualified professional. Testing and evaluation determining a substantially limiting disability must meet the Documentation Guidelines as outlined in this handbook and deemed adequate by the College.

3. What is considered acceptable documentation?

Documentation must be current, be completed by a qualified professional, and explain the 'substantial limitations' as a result of the disability, and provide accommodation recommendations. If you are unsure whether your documentation is current, please consult with an Academic Achievement Program counselor. Coe College reserves the right to determine the adequacy of submitted documentation and to require additional documentation and/or testing.

4. I believe I have a disability but no current documentation. What should I do?

If you have not received an evaluation or your documentation is determined to be outdated, Coe College can assist in obtaining information about local practitioners who can perform the evaluation. All costs incurred for obtaining appropriate documentation are your responsibility.

5. Who do I share my disability documentation with and when?

Coe College students should contact the Academic Achievement Program as soon as possible to determine what services and accommodations may be available. If you are a perspective student to Coe College, you should arrange a meeting with a staff member of the Program to discuss your documentation and potential services available. Students with disabilities accepted to Coe College should contact the AAP office as soon as possible to discuss the coordination of services.

6. What types of classroom accommodations are considered?

Accommodations may include, but are not limited to, extended time or alternate testing locations, note takers, test proctoring, and textbooks on tape. At Coe College, tutoring services, various academic enrichment activities (workshops on study skills, reading and

math skills enhancement, etc.) and counseling and support are available to all students free of charge.

7. I think I have a disability that interferes with my academic performance but I have never been tested. What should I do?

The Academic Achievement Program staff can help students by discussing what the interferences are and whether possible study or time-management strategies may help. If necessary, the staff can refer the student to a practitioner who can complete the evaluation. Please refer back to the Documentation Guidelines for more information on acceptable evaluations for disabilities.

8. Are there special disability advisors or academic coaches for students with disabilities at Coe College?

Coe College does not have special disability advisors or academic coaches. However, the AAP staff can meet one-on-one with any student on a weekly basis upon request. The AAP staff specializes in strategies to enhance study skills, organizational techniques, note-taking skills, time-management, and stress/anxiety management. A college course called the Transitions Program is also available which is designed to help students adjust to the college environment academically and personally. Each student makes his/her own choice of how often they need/will utilize the services provided by the AAP.

9. Are housing accommodations available?

Yes, upon acceptance to Coe College, students with disabilities with specific housing needs should contact the AAP as soon as possible. The Academic Achievement Program must have appropriate documentation with evidence of extenuating circumstances in order to consider students' requests for residential accommodations. Requests for housing accommodations will be handled on a case-by-case basis.

Grievance Procedures

Coe College supports students in their right to file a grievance when they believe they have been denied equal access in the form of appropriate accommodations, modifications, auxiliary aids, or effective communications or suffered discriminatory harassment. The general grievance procedures, which apply to all students, are available to students with disabilities. The grievance procedures listed below are additional procedures that apply to students with disabilities who feel their rights have been violated under 504 and ADA.

Procedure for Filing a Discrimination Complaint Based on a Disability

These procedures were established to comply with the ADA's mandate to "provide for prompt and equitable resolution of complaints alleging any action that would be prohibited."

An individual who:

1. Believes she or he has been discriminated against on the basis of their disability;
2. Whether disabled or not, believes that she or he has been discriminated against based on an association with a person with a known disability;
3. Wishes to appeal a recommended accommodation; or
4. Wishes to file a complaint and/or grievance regarding the College's compliance with ADA can file a complaint with the Academic Achievement Program Office.

To file a complaint alleging discrimination, an individual is required to notify the AAP Office in writing. If the student requires secretarial or other assistance in preparing such notifications due to his or her disability, this will be provided upon request. The following information should be included in the notification:

1. The nature of the complaint;
2. Date(s) of alleged incident(s) or disagreement(s);
3. Information about attempts to resolve the complaint with an AAP staff member;
4. Identification of witnesses who have knowledge of the alleged discrimination and;
5. A signed "release of confidential information" for any information or documentation in the student's file. (Release forms may be obtained at the AAP Office.)

If it is determined that Coe College policy was violated, a remedy to the problem will be offered. If it is determined that there was no violation, the complainant will be informed, and other options for possible resolution of the complaint will be explained. As with all other discrimination cases, there is no barrier to an individual bringing his or her concerns.

Resolving Conflicts with the College, Faculty and/or Staff, Academic Department or College Non-academic Department, Program or Organization.

1. Students are encouraged to discuss their concerns with an AAP staff member. The AAP staff, in an effort to clarify and resolve issues, will in the following priority:
 1. assist the student in discussing issues with the faculty or staff member,
 2. participate in discussions with the faculty or staff member, or call the faculty or staff member.
 3. In some instances, the other AAP staff may be consulted or a meeting convened in order to develop a resolution. Most situations are positively resolved through AAP staff support and mediation. The student and involved parties will be notified by an AAP staff member of progress, findings, or resolutions within 10 working days. Due to the urgency of many issues, it is likely that many problems will be resolved much sooner.
2. If the student or faculty member believes that a satisfactory resolution is still not reached, the student should notify the Affirmative Action Officer, who will initiate steps to effect an informal resolution acceptable to both parties.
3. The complainant, if not satisfied with the resolution proposed by the Affirmative Action Officer, has access to the college's grievance procedures upon prompt submission of a written request to the Affirmative Action Officer. Members of the grievance committee will meet to review the complaint. Unless the committee concludes the complaint is without merit, the parties to the dispute will be invited to appear before the committee. The committee may conduct its own informal inquiry and gather whatever information it deems necessary to assist it in reaching a determination as to the merits of the complaint.
4. If the grievance committee's findings do not lead to a mutually acceptable resolution, the Affirmative Action Officer will forward the grievance committee's recommendation promptly to the President of the College.
5. If the complaint is not resolved at the College level, the student may choose to file a complaint with the Federal Office of Civil Rights or The Iowa Civil Rights Commission. The following entity will take complaints and will investigate when appropriate.

Iowa Civil Rights Commission
211 East Maple Street, 2nd Floor
Des Moines, IA 50309-1858
515-281-4121; 1-800-457-4416
Fax: 515-242-5840