

STUDENT ACCOMMODATIONS POLICY & PROCEDURES

The College of Idaho is committed to providing an education environment that is accessible to the needs of its students with disabilities. The College provides reasonable services to enrolled students who have a documented physical, psychiatric, medical, learning, intellectual, or sensory disability (whether permanent, temporary, progressive, episodic, or transitory) that qualifies under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, and other pertinent federal, state, and local disability anti-discrimination laws. The College also affords formal grievance procedures that provide prompt and equitable resolution of any complaints arising out the College's responsibilities under the Americans with Disabilities Act or of Section 504 of the Rehabilitation Act of 1973 or other appropriate law.

I. RESPONSIBLE DEPARTMENT

The Department of Accessibility & Learning Excellence (DALE) is responsible for providing students with disabilities services necessary to promote a rewarding and successful academic experience. It also aims to foster a campus culture of acceptance, inclusion, and positive attitudes.

It is the responsibility of the student to make their disability and needs known to DALE in a timely fashion, and if the student is requesting an accommodation, to do so in writing and provide the appropriate documentation to support the requested accommodation(s). Once the College has been notified and specific accommodations are appropriately documented and requested by the student, the College works with the student and relevant faculty and staff to set up the approved accommodation(s). Accommodations can be arranged only through this process and are not retroactively applied.

If a student has or thinks they have a disability that impacts their performance as a student, they are encouraged to arrange support services and/or accommodations through DALE. Even if the student does not think their disability will impact their academics, it is in the student's best interest to disclose any disability to DALE.

II. DISABILITY SERVICES REGISTRATION

Ensuring equal access for all students is a collaborative effort between DALE, students, and faculty/staff. In order to access the wide range of services and support offered to students with disabilities, students must complete the below steps. It is recommended that students begin the below process as soon after admission as possible.

STEP ONE – COMPLETE APPLICATION TO INITIATE SERVICES

Complete the [Application to Initiate Services](#). Students may submit this in person or via e-mail.

STEP TWO – SUBMIT YOUR DOCUMENTATION

A student's documentation should be provided to DALE before their initial appointment. If the student does not have documentation, DALE can discuss this during their initial appointment. Transfer and incoming students can begin submitting documentation starting June 15th for the upcoming academic year.

If a student is seeking a residential accommodation, the College's Office of Residence Life encourages transfer and incoming students to begin the residential accommodation process with DALE by June 15th.

A student's documentation must include information from a qualified professional¹ that:

1. Clearly states the diagnosed disability;
2. Describes the functional limitations resulting from the disability;
3. Describes the specific accommodation(s) requested; and
4. Includes a list of all test instruments used in the evaluation report and relevant subject scores used to document the disability².

If testing accommodations are recommended, the documentation must also include complete educational, developmental, and medical history relevant to the disability for which testing accommodations are being requested.

Additionally, the student's documentation must comply with the Education Testing Service (ETS) documentation criteria³, which requires that the documentation must:

1. Be typed or printed on official letterhead and signed by an evaluator qualified to make the diagnosis (include information about license or certification and area of specialization); and
2. Be current⁴, which means within the:
 - a. Last 5 years for learning disabilities, attention-deficit/hyperactivity disorder, autism spectrum disorder, or intellectual disability.

¹ "Qualified professionals are licensed or otherwise properly credentialed and possess expertise in the disability for which modifications or accommodations are sought." U.S. Dep't of Justice, Civil Rights, Division, Disability Rights Section, ADA Requirements: Testing Accommodations, at https://www.ada.gov/regs2014/testing_accommodations.html. Additionally, for purposes of requesting accommodations at the College, the definition of "qualified professional" does not include a College employee (e.g. a staff member of the Health & Wellness Center or DALE), but does include a TimelyCare employee or provider.

² Requirement does not apply to physical or sensory disabilities of a permanent or unchanging nature.

³ The College has adopted ETS's standards for documentation of a disability and appropriate accommodations. This means the College will require that ETS standards for students with disabilities documentation be met by students seeking academic accommodations. In addition, the College will exercise the same discretion as ETS when reviewing documentation. The College adopts these standards in order to make the process of planning and preparing for college study easier for students who require academic accommodations. For more detailed information, including Educational Testing Service's policy statements and guidelines, see <https://www.ets.org/disabilities/documentation/>.

⁴ Requirement does not apply to physical or sensory disabilities of a permanent or unchanging nature. Additionally, it is the responsibility of the student to provide appropriate documentation to DALE in order to review accommodation requests. A prior high school 504 plan or IEP should **not** be used, as more current and accurate information may need to be compiled.

- b. Last 12 months for psychiatric disabilities and traumatic brain injury.

For purposes of progressive, episodic, or transitory disabilities, “current” means within the last 12 months.

Students should review in detail DALE’s documentation requirements to ensure the information provided meets DALE’s standards. In addition to the supporting documentation required to document the student’s disability, students must also complete one or more of the following Request for Accommodation forms:

- [Academic Accommodations](#) (for examples of common academic accommodations and where and how they apply, see Section III below); or
- Residential Accommodations, which include:
 - [Housing](#)
 - [Dietary](#)
 - [Assistance Animals](#)

(for examples of common housing and dietary accommodations and requirements for assistance animals, see Section IV below)

STEP THREE – MEET WITH DALE

Students should [contact DALE](#) to arrange a meeting *in the first two weeks of the semester* to determine reasonable and appropriate accommodations.

When determining reasonable accommodations, DALE considers a variety of information, including DALE’s interview/meeting with the student, the student’s submitted documentation, recommendations from other professionals, etc.

DALE has the responsibility to determine reasonable and effective accommodations and services in collaboration with the student, and it must provide or arrange for accommodations and services so the student has an equal opportunity to participate in courses, programs, activities, and services. It may, however, refuse a request for accommodations and services if the documentation fails to verify the need for the student’s request, if the documentation is not valid or current, or if the documentation is not provided in advance of need. Additionally, it may refuse to provide an accommodation or service that is inappropriate or unreasonable in such a manner as to: (i) pose a direct threat to the health and safety of others; (ii) constitute an alteration to an essential element of a course or program; or (iii) pose an undue financial or administrative burden to The College of Idaho.

III. ACADEMIC ACCOMMODATIONS

Academic accommodations provide students with disabilities equal access to educational opportunities and allow them to demonstrate their learning. Academic accommodations do not compromise the essential elements of a course or curriculum, nor do they weaken the academic standards or integrity of a course. Rather, they simply

provide an alternative way to meet the course requirements by eliminating or reducing disability-related barriers.

Reasonable academic accommodations may include, but are not limited to, exam accommodations,⁵ notetakers, alternative textbook formats, use of assistive technology, and flexibility on assignment deadlines. Students may request specific accommodations, as can the professional health care providers who verify the disability. However, the College has the responsibility for making the final decision on accommodations. This decision will be made on the basis of the documentation provided and the requirements of the academic program. Academic accommodations are assessed on an individual basis through an interactive process between the faculty member, DALE, and the student, and are backed by appropriate documentation.

It is important to note that academic accommodations are associated with a student's access and opportunity within an academic course(s). An academic accommodation does not extend to other requirements or procedures on campus or off campus, including but not limited to policies, procedures and deadlines associated with the Office of Financial Aid, the Office of the Registrar, the DSO Office, and the Title IX Office, and a student's participation in an internship/field placement.

Students are strongly encouraged to make accommodation requests as early in the semester as possible. This affords each professor the opportunity to plan for the implementation of appropriate accommodations. In particular, exam modification requests should be made to DALE at least one week in advance (two weeks in the case of final exams) to allow time to work out appropriate arrangements.

A. HOW TO SET UP ACADEMIC ACCOMMODATIONS

Beginning of Each Semester/Term: Once a student has registered with DALE and set up academic accommodations previously as required in Section II above, the student must take the following steps to activate their accommodations each semester/term:

STEP ONE – OBTAIN FACULTY NOTIFICATION LETTERS

To notify professors regarding a student's accommodation(s) and to access resources, the student must schedule an appointment with DALE to obtain their Faculty Notification Letters, which are electronically-generated letters personalized and addressed to each of the student's professors for each course for the specific semester/term.

⁵ Common "exam accommodations" include, but are not limited to, extended time on exams, a reduced distraction environment, use of a testing facility, use of assistive technology during exams, and a scribe for exams.

It is recommended that students schedule an appointment with DALE in the **first two weeks of the semester/term** to receive their Faculty Notification Letters. It is important to note that accommodations may not be activated retroactively.

STEP TWO – MEET WITH FACULTY MEMBERS

Upon receipt by the student of the Faculty Notification Letters, it is recommended that the student provides the letter to their professors during each professor's office hours or by special appointment to facilitate a private discussion.

It is important to note that Faculty Notification Letters list **requested** accommodations. These accommodations are not automatically applied to every course or assignment. The accommodation process is an interactive, individualized process; therefore, it requires a conversation with each of the student's faculty members to determine whether the requested accommodation(s) can be implemented within the particular course.

Students and professors will go over Faculty Notification Letters and accommodations requested for the course. Students are not required to disclose their disability diagnosis or symptoms to professors, but instead are encouraged to communicate how the professor can facilitate their success in the course. This discussion gives the professor an opportunity to ensure the accommodations are a good fit for their course requirements, as well as add their own ideas or suggestions.

If a faculty member has any questions regarding a requested accommodation, cannot reach mutual agreement with a student, or needs assistance, faculty members must immediately consult with DALE.

Federal law requires that colleges provide reasonable accommodations for students with disabilities in a timely manner. However, faculty are also responsible for maintaining the integrity of their course. If a faculty member believes an accommodation should be modified or cannot be implemented in their course because of concerns regarding alteration of the academic program or standards, it is essential that the faculty member immediately meet with DALE. DALE will facilitate a dialogue with the faculty member and the student in an attempt to work out arrangements that best meet the needs of the faculty member, the student, and the College. Any such arrangements will be documented by DALE.

If agreement cannot be reached, the Director of Accessibility & Learning Excellence will engage in a dialogue with the Associate Dean of Faculty, who will determine and document the course of action with respect to the requested accommodation(s) for the particular course or assignment. If the student believes the outcome of this process violates the Americans with Disabilities Act or

Section 504 of the Rehabilitation Act of 1973 or other appropriate law, the student may file a formal grievance pursuant to Section VI below.

STEP THREE – RETURN FULLY EXECUTED LETTER TO DALE

Students will obtain their professors signatures, sign the document themselves, and return it to DALE to sign. Once DALE circulates a fully executed copy of the letter and sends it to all parties, the accommodation(s) are officially active for the semester/term.

STEP FOUR – IF TESTING ACCOMMODATIONS APPROVED & ACTIVATED, NOTICE TO TESTING CENTER

If testing accommodations are approved by DALE pursuant to Section II above and activated by the student pursuant to Section III(A)(1) above, DALE will provide immediate notice to the Testing Center of the approved testing accommodation(s) for the student for each relevant course. DALE will not disclose the student’s disability diagnosis or symptoms to the Testing Center.

To utilize a testing accommodation(s) ***that cannot be accommodated by the faculty member or in class*** for a particular test/exam, students must follow the testing procedures outlined in Section III(C) below.

End of the Semester/Term Deadline: DALE requires students to initiate all new accommodations (i.e. not previously approved through the original initiation/registration process as outlined in Section II above) by the last day to withdraw from classes for that particular semester/term. If a student has not met with DALE by this date, DALE will not be able to provide accommodations for the current semester. In case of emergency, this process may be abridged on a case-by-case basis in consultation with the Director of Accessibility & Learning Excellence.

B. COMMON ACADEMIC ACCOMMODATIONS

DALE provides a variety of accommodations to match the different needs of our students. The below chart provides some examples of academic accommodations granted by DALE to support students with disabilities.

ACADEMIC ACCOMMODATIONS	LOGISTICS	WHO QUALIFIES?
ACCESSIBLE MATERIAL & TEXT FORMAT	Print and digital materials provided in accessible formats, including, but not limited to, electronic formats (PDF/Word), large print, audio, Braille, and eBook.	Students with disabilities related to reading and vision.
NOTE TAKING	Note taking can include the following forms: facilitation of a peer note-taker, use of assistive technology (e.g. smart pen/laptop), or recording (agreement must be signed by all parties).	Students with disabilities related to auditory processing, graphomotor difficulties, memory, and concentration.

FOREGO SPELLING/GRAMMAR EVALUATION ON IN-CLASS WRITING	Impromptu in-class writing is graded for content, not grammar and spelling. May not be applicable in classes where the primary instructional goal is related to grammar and spelling (i.e., some foreign language classes).	Students with disabilities related to reading and spelling.
EXTENDED TIME ON EXAMS	Student requests a testing accommodation at least one week prior to the exam date (and two weeks for final exams) pursuant to the Testing Accommodations Procedures (see Section III(C) below)	Students with disabilities related to processing speed, concentration, reading speed, writing speed, and memory.
REDUCED DISTRACTION ENVIRONMENT	A testing environment that limits interruption and other environmental influences including visual and auditory distractions.	Students with disabilities related to anxiety, concentration and students who use voice recognition software.
BREAKS	Requests for additional or longer breaks during class or during exams.	Students with disabilities related to concentration or disabilities that require students to take medication, test blood sugar, rest, stretch, or use the restroom.
USE OF COMPUTERS FOR EXAMS	Students complete the exam using a DALE-approved computer with no internet or wireless access. Only with specific guidelines and faculty approval, some students may use their own computer.	Students with disabilities related to hand mobility, graphomotor difficulties and writing speed.
SENSITIVE CONTENT MODIFICATIONS	Requests for sensitive content disclaimers and/or alternatives when such content may trigger or exacerbate disability.	Students with adjustment disorders and PTSD.
PARTICIPATION CONSIDERATION (WITHIN REASON)	Requests for adjusted or reduced class participation, fading in participation in classroom dynamics or alternative forms of assessment. "Within reason" usually means permitting, for example, a specific reduction in the number of required participation activities for a limited period of time.	Students with a disability that substantially limits their functioning during cold-calling sessions, in-class discussions, and/or oral presentations.
FLEXIBILITY (WITHIN REASON) ON ASSIGNMENT DEADLINES	Students confer with the instructor before the due-date about the status of work completed on the assignment, the reasons for its lateness that directly relate to the nature of the disability, and a definite turn-in day and time. "Within reason" usually means turning work in a day or two beyond the deadline. In no case should it mean that late assignments begin to "pile up", a negative situation for both student and professor.	Students with disabilities related to writing speed, processing speed, graphomotor difficulties, concentration, and anxiety.

<p>FLEXIBLE ATTENDANCE (WITHIN REASON)</p>	<p>“Within reason” usually means permitting a specific number of additional absences a student is allowed in addition to each class’ established attendance policy.</p> <p>Students should confer with the instructor about their flexible attendance needs at the beginning of the academic semester. Flexible attendance is dependent upon the individual student, the nature of the course, and the degree to which class attendance is an essential requirement of the specific course.</p> <p>Absences for reasons not related to a documented disability are not excusable under Flexible Attendance. When possible, students should communicate with instructors in advance of their absence. If notifying the instructor before class is not possible, students should inform instructors as soon as possible.</p>	<p>Students with significant health-related disabilities who miss class when flare-ups occur or when issues related to their disability prevent them from attending class.</p>
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C. TESTING ACCOMMODATIONS PROCEDURES

If testing accommodations are approved by DALE pursuant to Section II above and activated by the student pursuant to Section III(A)(1) above, and if the testing accommodation(s) **cannot be accommodated by the faculty member or in class**, students may request to utilize their testing accommodation(s) for a particular test/exam at the Testing Center located in Cruzen-Murray Library.

The Cruzen-Murray Library Testing Center proctors tests/exams for students with approved testing accommodations that cannot be accommodated by the faculty member or in class. The Testing Center does not provide proctoring for tests/exams missed due to absence, illness, or travel (including travel for College-sponsored activities).

i. HOW TO MAKE A REQUEST TO UTILIZE A TESTING ACCOMMODATION

To make a request to utilize a testing accommodation(s) for a particular test/exam, students must complete the Testing Accommodation Request Form at least one week in advance of the test/exam (and two weeks in advance of final exams).

Upon receipt of a timely testing accommodation request, the Testing Center will confirm whether it has received notice from DALE regarding an approved testing accommodation(s) for the student. If so, the process to administer a testing accommodation will proceed as follows:

1. The Testing Center will email the student's faculty member the Exam Request Form to obtain information about as well as a copy of the relevant exam.
2. The faculty member will complete the Exam Request Form and submit a copy of the relevant exam (either via the form or email) at least 24 hours prior to the time of exam administration.
3. Upon receipt of the faculty member's Exam Request Form, the Testing Center will schedule the exam based on available dates/times in the Testing Center and inform the student of the testing date, time, and location. For scheduling requirements of the Testing Center, see Section III(C)(ii) below.
4. Prior to the examination date, the Testing Center will maintain the exam in a secure location until the administration of the exam.
5. Upon the student's completion of the exam, the Testing Center will inform the faculty member and maintain the completed exam in a secure location until the faculty member can pick it up. Exams will be available for faculty pickup in the library between 8am-9pm MT on Monday through Thursday, 8am-5pm MT on Friday, and 1pm-5pm MT on Sunday.

ii. SCHEDULING REQUIREMENTS

The Testing Center will be available **by appointment only** between 1pm-8pm MT on Sunday through Thursday, unless other times are arranged with the Testing Center.

Typically, exams must be taken on the same date and during the same time classes are scheduled. However, in light of the Testing Center's available hours, space limitations, and scheduling conflicts, this may not always be feasible. If an accommodated exam cannot be scheduled on the same date or at the same time classes are scheduled, the Testing Center will obtain prior approval to take the exam on a different date and/or at a different time from the faculty member.

If, for some reason, the student cannot take the exam at the scheduled time, they must contact the Testing Center. The student is responsible for notifying the professor(s) if an examination needs to be rescheduled.

If a student is late for a scheduled exam, that amount of time will be subtracted from the total allotted test-taking time. For example, if a student is 15 minutes late for a scheduled examination, then those 15 minutes will be subtracted from the total allotted test-taking time.

In the case of inclement weather, the student and professor will contact the Testing Center to reschedule the examination.

iii. ACADEMIC INTEGRITY

Students taking examinations pursuant to a testing accommodation request at the College's Testing Center must comply with [The College of Idaho Honor Code](#).

To ensure academic integrity, each student will be monitored during testing either in person by a test proctor or using video cameras that record both audio and video. It is important to note the following:

- If a student is caught cheating, the test will be taken away and the faculty member will be contacted immediately.
- Students may only have the materials the faculty member has given written permission to use during the examination.
- If an exam requires the use of blue books or loose-leaf paper, the test proctor will examine these items prior to testing.
- Students must return all scratch paper, exams, or other items used during testing to the test proctor.
- Students must leave all textbooks and materials (unless approved by the faculty member), bags, backpacks, purses, coats, and cell phones or other personal data devices with the test proctor. Items will be securely stored in a locker.
- Ordinarily, students are not permitted to use the restroom during the examination. If a student must use the restroom, the test proctor will escort the student.
- If a student is approved to take breaks during exams, all breaks outside of the testing room will be monitored by the test proctor.

IV. RESIDENTIAL ACCOMMODATIONS

The College of Idaho takes an individualized, interactive approach to facilitate residential accommodations, including housing, dietary, emergency evacuation, and animal assistance accommodations.

A. HOUSING

DALE approves reasonable housing accommodations to support College of Idaho students with disabilities that impact the daily tasks of living. Below are examples of housing accommodations provided by DALE:

- Ground Floor or Elevator Access to Dorm Room
- Single Room
- Access to Kitchen
- Wheelchair Accessibility

To request a housing accommodation, complete the steps outlined in Section II above.

During a student's initial appointment, DALE will engage with the student in an interactive process around the student's disability and discuss how the disability impacts the student in a residential setting.

It is important to note that DALE has no authority in room selection. The Office of Residence Life will assign rooms to meet documented and reasonable accommodation requests. Placement in housing pursuant to an accommodation cannot be guaranteed.

It is also important to note that DALE has no authority to modify or adjust the financial implications associated with housing granted pursuant to an accommodation. If students have financial concerns or questions, they must meet with the College's Business Office.

B. MODIFIED MEAL PLANS

DALE approves reasonable dietary accommodations to support College of Idaho students with disabilities. Below are some common examples of DALE dietary accommodations:

- Modified Meal Plan
- Exemption from Meal Plan
- Collaboration with Meal Services to Ensure Access to Specific Ingredients to Meet Dietary Needs

To request a dietary accommodation, complete the steps outlined in Section II above.

It is important to note that DALE has no authority to modify or adjust the financial implications associated with an approved dietary accommodation. If students have financial concerns or questions, they must meet with the College's Business Office.

C. ASSISTANCE ANIMALS

Assistance Animals are allowed only within the dwelling unit of their owner as a reasonable accommodation if:

- the person has a psychiatric disability;
- the animal is necessary to afford the person with a disability an equal opportunity to use and enjoy their dwelling; **and**
- there is an identifiable relationship or nexus between the disability and the assistance the animal provides.

Please review The College of Idaho's Service & Assistance Animal Policy.

To begin the approval process for an assistance animal, students should complete the steps outlined in Section II above.

Once all steps are completed, DALE will notify the student whether or not the request for an assistance animal is approved. If approved, DALE will also notify the Office of Residence Life, which will then contact the student with information about housing community expectations.

V. CONFIDENTIALITY

The College of Idaho respects the privacy of our students. The Family Educational Rights and Privacy Act (FERPA) governs all student record information. All information concerning student disabilities and accommodations is kept separately from student

academic files. This information is confidential and will not be released to third parties without the written permission of the student, except in circumstances involving matters of health, safety, and law.

When students request accommodations, particularly instructional accommodations, the issue arises as to what and how much information the faculty needs and/or has the right to know. By signing the Application to Initiate Services form, students acknowledge and understand that, in order for DALE to coordinate, advise, or administer requested accommodations, disclosure of disability information to faculty or appropriate administrators/staff may be necessary and/or required.

DALE keeps student files for five years after the last activity (i.e., after graduation, after transferring, etc.). If a student needs access to their disability records, students should contact DALE. After five years of inactivity, a student's DALE file will be removed from DALE's archives and shredded to protect confidentiality.

VI. GRIEVANCE PROCEDURES

A. COMPLAINTS AGAINST FACULTY, STAFF, OR OTHER EMPLOYEES OF THE COLLEGE OF IDAHO

In the event a student believes that the procedures described in this Student Accommodations Policy have not been followed properly by a College faculty or staff member, the student may file a formal grievance by completing the following steps:

1. The student shall file a formal grievance within 180 calendar days after the complainant becomes aware of the alleged violation. The student shall file the complaint in writing to:
 - a. the Provost/Dean of the Faculty if the matter involves an academic accommodation as articulated in Section III above; or
 - b. the Vice President of Student Affairs if the matter involves a residential accommodation as articulated in Section IV above or a complaint against the Department of Accessibility & Learning Excellence.

The complaint shall contain the name and address of the person filing it and a brief description of the alleged violation of the Americans with Disabilities Act or of Section 504 of the Rehabilitation Act of 1973 or other appropriate law.

2. The official to whom the complaint is submitted shall convene a committee within two weeks of receiving the complaint unless prohibited by unusual circumstances. The committee shall be made up of:
 - the official to whom the complaint is submitted;
 - the Vice President of High Impact Practices; and
 - an independent, disinterested professional familiar with the type of disability involved.

3. The committee shall hear testimony or receive written testimony from the student; DALE staff; the relevant faculty or staff member(s); and other knowledgeable people. The student has the right to ask for testimony from any faculty or staff whom they deem relevant to the case.
4. After hearing testimony and/or reviewing pertinent documents, the committee shall report its conclusions in writing to the complainant and all other relevant parties within ten (10) working days, barring exigent circumstances. The decision of the committee is final.

The College will not tolerate any retaliatory treatment or adverse consequences as a result of a student acting in good faith to report a complaint or participating in an investigation. Reports of retaliation will be promptly, thoroughly, and impartially investigated. The College will take all reasonable steps to prevent retaliation or to remedy the effects if it does occur. The exercise of rights protected under the First Amendment does not constitute retaliation.

If a student believes they or some other member of the student community has been the victim of harassment or discrimination by any member of the Board of Trustees, administrator, member of the staff or faculty, employee, student, volunteer, non-College of Idaho employee, or any other person in connection with the College, a complaint should be made as outlined in the College's Harassment Prevention Policy.

B. COMPLAINTS AGAINST STUDENTS

If a student believes they or some other member of the student community has been the victim of harassment or discrimination by another student because of a disability, a complaint should be made as outlined in the General Student Conduct Procedures as articulated in the College's Student Handbook.