Center for Accessibility and Learning Services (CALS)   
Policies and Procedures

I: OVERVIEW: ACCOMMODATIONS FOR STUDENTS WITH DISABILITIES

Chestnut Hill celebrates students who learn and think differently and seeks to empower all students to reach their full and unique potential throughout their college journey. In order to fully participate in academic, extracurricular, and campus life activities at Chestnut Hill College, students may require reasonable accommodations for accessibility. Chestnut Hill provides equal opportunities for students with disabilities in accordance with federal, state, and local laws (Section 504 and ADAAA). Students with disabilities who need accommodations for equitable access to this learning environment, are encouraged to disclose their disability.

Disclosure of a disability is voluntary and confidential. In order to disclose a disability to receive accommodations under the law, students can contact the Center for Accessibility and Learning Services the following ways:

* In person: Center for Accessibility and Learning Services, located in St. Joseph Hall-- room 240
* Via telephone 215-242-7738
* Via Email: Cals@chc.edu

Students can apply for accommodations at any time of the semester, but please be aware that some accommodations may require time to implement and accommodations are typically not retroactive. Students requesting accommodations are expected to submit documentation indicating the following:

1. Nature and duration of the condition
2. Need for accommodations
3. How the diagnosed condition currently impacts functioning and causes substantial limitation.

Further information surrounding submission of documentation is captured in Section II: General Procedures for Requesting Accommodations

Chestnut Hill College neither imposes accommodations on students nor pre-empts their responsibility, as a legal and social adult, to disclose disabilities and request reasonable accommodations.

Confidentiality on all matters pertaining to a disability is protected by state and federal law. Information in an individual’s Accommodations Packet and supporting documents, as well as any correspondence pertaining thereto, is housed in the Center for Accessibility and Learning Services in a locked file cabinet. All disabilities information is kept separate from the student’s academic record and will not be shared with anyone except as permitted by law, by the terms of the student’s consent, or on a need-to-know basis in order to academically and safely support the student during their college career.

II: GENERAL PROCEDURES for REQUESTING ACCOMMODATIONS

Step 1: Student discloses disability and need for accommodations by scheduling a meeting with the Director of Center for Accessibility and Learning Services. \*Student may complete step 2 prior to or after meeting with Director\*

If students have documentation they would like to share before meeting with the Director, they should submit said documentation to the Center for Accessibility and Learning Services at the following mailing address:

Chestnut Hill College

Center for Accessibility and Learning Services

240 St. Joseph Hall

9601 Germantown Avenue

Philadelphia, PA 19118

Care of: Director of Center for Accessibility and Learning Services

Or Email: [Cals@chc.edu](mailto:Cals@chc.edu)

Fax: 215-248-7019

Step 2: Statement of Disabilities

Students who are requesting accommodations in the College’s courses or programs should contact the Center for Accessibility and Learning Services to obtain an Accommodations Packet to ensure timely provision of services. The accommodations packet is available to students online and also available in the Center for Accessibility and Learning Services. The Accommodations Packet includes:

1. Confidential Disability Disclosure Document/ Intake Information form
2. Statement of Disabilities
3. Release of Confidential Records/Student Record Release form so that medical and other information (for example, information from a psychologist or therapist) can be released to Chestnut Hill College.
4. Policies and Procedures Document

Attached to the Accommodations Packet, the student will submit substantiating documentation, including any standardized evaluations, academic records, Individualized Educational Plans, or Section 504 plans appropriate. See Section III: Documentation Guidelines for expectations regarding this paperwork.

The College reserves the right to require additional documentation if the Director feels more information is needed in order to make a decision. The Director of the Center for Accessibility and Learning Services or designee will contact the student in writing if more documentation is required. In addition, they, or a designee may also contact specialists listed on the Release of Confidential Records/Student Record Release form for additional information or clarification of information.

Once the student meets with the Director and submits their necessary paperwork, the review, potential approval, and orientation to accommodations can take up to four weeks. Accommodations are not typically retroactive.

Step 3: Determination of Eligibility and approved reasonable accommodations is sent to student via email.

After reviewing the completed and signed Accommodations Packet and supporting documentation, the Director of the Center for Accessibility and Learning Services will determine eligibility and provide suggestions for reasonable accommodations.

Step 4: Student Signs the Accommodations Form

Upon approval of accommodations, a confirmation of accommodations will be sent to the student. The student will confirm the approved accommodations by signing the Accommodations Form.

Step 5: Instructors and other applicable individuals notified of accommodation approvals by the Director of the Center for Accessibility and Learning Services.

Upon receipt of the Confirmation of Accommodations Form, an Accommodation Letter outlining the approved accommodations will be developed by the Director of Center for Accessibility and Learning Services, or their designee, and sent electronically to each instructor in that given semester.

Step 6: Student notifies instructors and other applicable individuals to activate their accommodation(s).

It is the student’s responsibility to reach out to the instructor to activate the accommodations after receiving the accommodation letter(s) since accommodations are not retroactive and arrangements for test taking, equipment, housing assignments and other considerations require advance notice. Accommodation requests cannot be granted on the same day in which they are requested. Students reserve the right not to disclose their letters to every instructor but should be aware that accommodations will not be made unless the instructor is informed of the accommodations. The Director is available for any questions or clarifications needed from the student or faculty members.

III: DOCUMENTATION GUIDELINES

Chestnut Hill College follows the guidance and documentation practices as outlined by the Association on Higher Education and Disability (AHEAD). AHEAD is a professional resource for disability professionals in higher education. AHEAD guidance and documentation practices presents a framework to support practices that provide access through equal treatment in higher education environments. AHEAD guidelines reflect the current changes in society’s understanding of disabilities, the 2008 amendments to the Americans with Disabilities Act, and the updated regulations and guidance to Titles II and III of the ADA.

Sources of Documentation

Acceptable sources of documentation for substantiating a student’s disability and request for particular accommodations, including academic adjustments and auxiliary aids, take a variety of forms including *primary, secondary, and tertiary documentation.*

*Primary documentation: Student’s Self-Report*

The student is the most important source of information regarding how their functioning may be limited by their diagnosis and also in determining what their strengths and needs are in order to support their access to college. A structured interview or questionnaire is used with every student to determine their experience of their disability, barriers, and effective and ineffective academic accommodations in the past.

*Secondary Documentation: Observation and Interaction*

The Director of the Center for Accessibility and Learning Services will use their experience, expertise, and observations to evaluate the effectiveness of previously implemented academic adjustments and student reports. Experienced disability professionals are an important part of the documentation process and should use observations of students’ language, performance, and strategies as an appropriate tool in validating student narrative and self-report. In addition to disability professionals, higher education professionals, such as academic advisors, professors, and other higher education professionals may use their expertise and observations of the student if applicable to help support the need for accommodations.

*Tertiary Documentation: Information from External or Third Parties*

Documentation from external sources include educational or medical records, reports and assessments created by health care professionals, psychologists, teachers, or professionals in the educational system. Tertiary documentation reflects education and accommodation history. Forms of tertiary documentation include but are not limited to the following: Individual Education Plan (IEP), Summary of Performance (SOP), teacher observations, and/or 504 Plans. Tertiary documentation will vary in its relevance and value depending on context, credentials of evaluator, and level of detail provided. Tertiary documentation should be current and relevant, but not necessarily recent. Information provided in tertiary documentation should describe how the condition impacts the student at the current time and in the current circumstances.

*General Guidelines for External or Tertiary Documentation include:*

1. A diagnostic statement identifying the condition(s): As appropriate, include ICD or DSM codes, the date of the most recent evaluation, or the dates of evaluation performed by referring professionals. If the most recent evaluation was not a full evaluation indicate when the last full evaluation was conducted.
2. Current functional impact of the condition(s): The current functional impact on physical (e.g., mobility, dexterity, and endurance), perceptual, cognitive (e.g., attention, distractibility, and communication), and behavioral abilities should be described as clinical narrative and/or through the provision of specific results from the diagnostic procedures. Descriptions should provide a statement of severity, information on variability over time or circumstance and potential of environment triggers.
3. Treatment, medications, assistive devices/services currently prescribed or in use: A description of treatments, medications, assistive devices, accommodations, in current use and their effectiveness in addressing the functional impacts. Describe any significant side effects that may impact physical, perceptual, behavioral, or cognitive performance.
4. The expected progression or stability of the impacts described over time: Description should include an estimate of the change in the functional impacts of the conditions(s) over time. If the condition(s) is variable, are they under self-care for flare-ups or episodes?
5. Recommended accommodations and services. Recommendations should be connected to the functional impact described under point 2. The accommodations granted by the college will in most cases follow those recommended by the evaluators but might be adapted depending on the particular program of study undertaken by the student.

*Guidelines specific to Learning Disability, Autism, and Auditory Processing Differences*

In addition to the five General Guidelines for External or Tertiary Documentation, students diagnosed with a Learning Disability, Autism, or Auditory Processing Disorder should have the following:

1. Evidence of a history of substantial learning difficulties present since school age, observational data from the evaluation.
   1. Test scores from a psychoeducational or neuropsychological assessment. Such standardized measures may assess cognitive and academic skills, processing speed, fluency, memory, and executive functioning and should include the following:
      1. Adult cognitive assessment (e.g., Wechsler Adult Intelligence Scale, Stanford-Binet 5, Woodcock-Johnson, TOCA)
      2. Achievement measures including measures of fluency (e.g., Woodcock-Johnson, Wechsler Individual Achievement Test)
      3. See Appendix A for more information on standardized assessments that can help to support the approval of accommodations

Rationale Regarding the Documentation Process

Our goal at Chestnut Hill College is to ensure that students have equitable access to their college environment. Ensuring access requires a deliberative and collaborative process unique to each student. The Director of the Center for Accessibility and Learning Services needs to engage in a structured exchange with students to explore their needs as related to their diagnosis. There is no one-to-one correspondence of disability to accommodation. The Director needs to consider the student’s disability, history, experience, request, and unique characteristics of the course, program, or requirement in order to determine whether or not a specific academic adjustment is reasonable.

Chestnut Hill College strives to comply with a non-burdensome process. The non-burdensome standard is applicable to initially establishing a relationship with the Director of the Center for Accessibility and Learning Services and to setting up individual accommodations. Students should not be required to bear responsibility for achieving access through cumbersome, time-consuming processes.

Important Definitions

The term “disability” includes (a) a physical and/or mental impairment that substantially limits one or more major life activities of an individual; (b) a record of such an impairment; or (c) being regarded as having such an impairment. In addition, the ADA Amendments Act of 2008 extends the definition of disability to include, “episodic or in remission if it would impair a major life activity when active”. Also, the definition of major life activity was expanded to include major bodily functions. The ADA further defines mental impairment to include any mental or psychological disorder, such as emotional or mental illness. The American Psychiatric Association’s most current Diagnostic and Statistical Manual of Mental Disorders (DSM) is frequently used as guidance for identifying psychiatric, behavioral, and mental health disorders. However, not all conditions listed in the DSM are disabilities or even impairments for purposes of the ADA.

A reasonable accommodation in the educational setting is a modification or adjustment to a course or program that will enable an otherwise qualified person with a documented disability to participate in the program or course and/ or to enjoy the rights and privileges offered by the College. Modifications that impose an undue burden on the College or pose a health or safety risk are not considered reasonable. All medical and non-medical records supporting the need for an accommodation are to be submitted to the Director of the Center for Accessibility and Learning Services.

Individual Analysis: The modifications offered must be appropriate to the needs of the individual; thus, in each instance, an individualized analysis must occur. The Director of the Center for Accessibility and Learning Services will develop, in conjunction with the student, an accommodation plan for the student if a reasonable accommodation is appropriate.

Course Modifications: The College is not required to provide an aid or service or make any modifications that would result in a fundamental alteration of the essential elements of a course or program. However, reasonable accommodations will be provided for qualified students with verified disabilities. When a course requirement is essential to the academic program in which the student is enrolled, the College does not have to modify or waive the requirement. In deciding whether a requested accommodation would result in a substantial program alteration or would fundamentally alter the academic standards of the program, the Director of the Center for Accessibility and Learning Services , in collaboration with the faculty of the appropriate academic department, will take into consideration the underlying academic reasons for the requirement, the program standards, and other related factors in order to decide if the requested accommodation would be inconsistent with the academic standards of the course or program.

Auxiliary Aids and Services: This term refers to equipment or services that assist communication. The College pays for the cost of the auxiliary aid for service when the aid is the only reasonable accommodation for a qualified student. If provisions of a particular auxiliary aid or service would result in either a fundamental alteration of the program or in an undue burden (i.e., significant difficulty or expense), the College will attempt to provide an alternative auxiliary aid or service. The College does not need to provide services of a personal nature. The College will give careful consideration to the requests of the disabled individual, but is not required to give the disabled person the auxiliary aid of his or her choice.

IV: RESPONSIBILITES

*STUDENT RESPONSIBILITIES*

Every qualified student with a disability who requests accommodations has the responsibility to:

* Meet the college’s qualifications and essential standards.
* Identify themselves in a timely manner as a qualified individual with a disability when seeking an accommodation.
* Follow Chestnut Hill College’s procedures for obtaining reasonable and appropriate accommodations.
* Provide sufficient documentation from appropriate sources, including professionals, that verify the nature of the disability and the need for specific accommodations.
* Provide signed consent authorizing the Director to discuss their need for reasonable accommodations, academic adjustments, and/or auxiliary aids with the professional source of their documentation.
* Inform the instructor at the beginning of each semester about the disability, how performance may be affected, and the necessary and reasonable accommodations that have been approved by the Director of the CALS.
* Meet the procedural requirements established by the college for scheduling exams, requesting assistance, or making arrangements with the instructor for delivering the exam to the location of testing.
* Contact the Director of the Center for Accessibility and Learning Services at the end of each semester so that appropriate accommodations can be made in a timely manner for the following semester. Students are strongly encouraged to make this contact within the last four weeks of each semester.

*DIRECTOR OF CENTER FOR ACCESSIBILITY AND LEARNING SERVICES RESPONSIBILITIES*

The Director of Accessibility and Learning Services has the responsibility to:

* Provide access to the college’s qualifications and essential standards for students.
* Provide access to necessary documents for students to disclose a disability.
* Provide access to Chestnut Hill College’s procedures for obtaining reasonable and appropriate accommodations.
* Review documentation from appropriate sources to verify the nature of the disability and the need for specific accommodations.
* Assist students in understanding the procedural requirements established by the college for scheduling exams, requesting assistance, or making arrangements with the instructor for delivering the exam to the location of testing.
* Provide access to appropriate resources and information to assist in ensuring access to the college environment for students with disabilities.

V: OTHER CONSIDERATIONS

* Academic Support is available for all students through the Learning Services Center, Math Center, Foreign Language Center, Writing Center, and/or the Counseling Center. Accessibility issues for qualified students with physical disabilities are coordinated through the Center for Accessibility and Learning Services in conjunction with the Residence Life Office.
* The Center for Accessibility and Learning Services works in collaboration with the Reading Specialist, the Consulting Coordinator of Learning Services, the Director of the Counseling Center, the Office of Academic Advising, the Dean of Student Life, and the Dean of the School in which the student is enrolled in order to arrange reasonable accommodations for students with disabilities.
* Chestnut Hill College cannot modify ethical and professional standards of conduct required in a professional development program since the purpose of these standards is to protect the welfare of multiple groups, including patients, clients, and students.

Appeal Information for Accommodations not Approved

If the Director of the Center for Accessibility and Learning Services determines that a student does not qualify for accommodations, a letter outlining the decision and the reason for the decision will be developed by the Director of the Center for Accessibility and Learning Services , who will send the letter to the student.

If a student does not agree with the decision of the Director of the Center for Accessibility and Learning Services regarding the question of eligibility or the reasonable accommodations offered, then the student may appeal the Director’s decision in writing within 15 calendar days. The student should complete the Disabilities Appeal Form identifying in detail the basis for the student’s objections to the Director’s decision. The form should be submitted to the Vice President for Academic Affairs (VPAA), 334 St. Joseph’s Hall, who will then review the situation, including all documentation previously submitted and any additional information the student includes for their review. The VPAA may schedule a hearing if they deem it necessary to the decision-making process. A decision shall be issued by the VPAA within 30 days after receipt of all documentation unless both the student and the VPAA agree in writing that the time period may be extended by a specified period of time. The decision of the VPAA shall be final. The Disability Appeals Form can be obtained from the Director of the Center for Accessibility and Learning Services, 240 St Joseph’s Hall.

All questions should be referred to the Center for Accessibility and Learning Services. Phone: 215-242-7738, Email: *Email To Be Assigned*

APPENDIX A

Acceptable Tests and Measurements

The technical adequacy of instruments including their reliability, validity and standardization on an appropriate normed group will be considered for all documentation provided to the Chestnut Hill College Director of the Center for Accessibility and Learning Services. The following list is provided as a helpful resource, but it is not intended to be definitive or exhaustive. Preferred measures are indicated in bold print. Documentation of aptitude, achievement, and information processing should be normed for adults and provide recent information to support the approval of accommodations.

Aptitude — A measure of intellectual ability or cognitive functioning, which includes assessment of verbal and non-verbal abilities.

* Wechsler Adult Intelligence Scale
* Woodcock-Johnson Psychoeducational Battery — Test of Cognitive Ability
* Kaufman Adolescent and Adult Intelligence Test (KAIT)
* Stanford-Binet Intelligence Scale

Note: The Slosson Intelligence Test — Revised, the Kaufman Brief Intelligence Test, and the Wechsler Abbreviated Intelligence Scale are primarily screening devices that are not comprehensive enough to provide the information necessary to make accommodation decisions. Therefore, the College will not accept their sole findings for consideration of accommodations.

Academic Achievement — A measure of achievement in reading comprehension, written language, mathematics, reading rate, written expression, writing mechanics, vocabulary, writing, grammar, or spelling.

* Scholastic Abilities Test for Adults (SATA)
* Stanford Test of Academic Skills (TASK)
* Woodcock-Johnson Psychoeducational Battery — Tests of Achievement
* Wechsler Individual Achievement Test (WIAT)
* Kaufman Test of Educational Achievement (KTEA)

Or specific achievement tests such as:

* Nelson-Denny Reading Skills Test
* Stanford Diagnostic Mathematics Test
* Test of Written Language (TOWL)
* Woodcock Reading Mastery Tests

Note: Specific achievement tests are useful instruments when administered under standardized conditions and interpreted within the context of other diagnostic information. The Wide Range Achievement Test is not a comprehensive measure of achievement and therefore not useful if used as the sole measure of achievement.

Information Processing — A measure of information processing in visual and/or auditory processing, memory, processing speed, attention and concentration, perceptual motor skills, or other cognitive measures.

* Detroit Tests of Learning Aptitude (DTLA)
* Detroit Tests of Learning Aptitude — Adult (DTLA-A)
* Woodcock-Johnson Psychoeducational Battery — Tests of Cognitive Ability
* Wechsler Memory Scale (WMS)

Or specific tests such as:

* Trail Making Test Parts A & B
* Controlled Oral Word Association
* Thurstone Word Fluency Test
* Tests of Auditory and Perceptual Memory

Social/Emotional/Behavioral/Adaptive

* Self-Report and Behavioral Rating Scales such as
  + Beck Depression Inventory (BDI)
  + Manifest Anxiety Scale (MAS)
  + State-Trait Anxiety Scale
  + ADHD Rating Scale
  + Connors Adult ADHD Scale
* Minnesota Multiphasic Personality Inventory (MMPI-2 or MMPI-2-RF)
* Personality Assessment Inventory (PAI)

Additional References

* The Diagnostic and Statistical Manual of Mental Disorders (DSM) — Published by the American Psychiatric Association (APA), this manual covers all mental health disorders for children and adults. It also lists known causes of these disorders, statistics in terms of gender, age at onset, and prognosis as well as some research concerning the optimal treatment approaches.

*It should be noted that changes to this document that do not impact the substantive content of the information conveyed in the document (i.e. email address, phone number) are not subject to Executive Cabinet approval.*