

Reasonable Accommodations and Services for Students with Disabilities

Policy & Standard Procedure

Version 1.2

Updated: October 7, 2025

Policy Statement

The Institute is dedicated to the principles of the Americans with Disabilities Act as Amended (ADA) and the religious accommodations outlined in Title VII of the Civil Rights Act of 1964 as amended. The Institute will make reasonable accommodation for qualified individuals with known disabilities and employees whose work requirements interfere with a religious belief unless doing so would result in an undue hardship to the Company or cause a direct threat to health and safety.

It is the policy of the Institute to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is the company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

Scope of Policy

This policy applies to all current and prospective employees and current and prospective students and is designed to be an interactive process for all parties involved.

Definitions

Americans with Disabilities Act (ADA): The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) are federal laws that require employers with 15 or more employees to not discriminate against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

Section 504: Section 504 is a federal civil rights law designed to eliminate disability discrimination in programs and activities that receive federal funds. To be protected under Section 504, a student must be determined to: (1) have a physical or mental impairment that substantially limits one or more major life activities; or (2) have a record of such an impairment; or (3) be regarded as having such an impairment. The Institute will provide students with appropriate academic adjustments and auxiliary aids and services that are necessary to afford an individual with a disability an equal opportunity to participate in a school's program. Recipients are not required to make adjustments or provide aids or services that would result in a fundamental alteration of a recipient's program or impose an undue hardship.

Disability (ADA): A physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment. These are not meant to be all-inclusive and should not be construed as such. They are not the only conditions

that are considered to be disabilities, impairments, or reasonable accommodations covered by the ADA/ADAAA policy.

Disability (Section 504): The Section 504 regulatory provision at 34 C.F.R. 104.3(j)(2)(i) defines a physical or mental impairment as any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The regulatory provision does not set forth an exhaustive list of specific diseases and conditions that may constitute physical or mental impairment because of the difficulty of ensuring the comprehensiveness of such a list.

Reasonable Accommodation: Includes any changes to the work environment and may include making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part- time or modified work schedules, telecommuting, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

Undue hardship (ADA & Section 504): An action requiring significant difficulty or expense by the Institute. In determining whether an accommodation would impose an undue hardship on a covered entity.

Undue hardship (religious): An accommodation would pose an undue hardship if it would cause more than de minimis cost on the operation of the Institute's business.

Direct threat: A significant risk to the health, safety or well-being of individuals with disabilities or others when this risk cannot be eliminated by reasonable accommodation.

Student Accommodation

Documentation Guidelines

The Institute uses several tools in determining what may be a reasonable accommodation for a disability. We consider the student's self-report as a vital source of information. Additionally, we may require information from other sources to establish that the student is a qualified individual with a disability who is entitled to receive a reasonable accommodation. To begin the process, we ask requestors to fill out our Reasonable Accommodation Form and attach applicable documentation. The Accommodation form is available by request from your Director of Education. See Exhibit A, *Student Reasonable Accommodation Form*.

Types of documentation that may be helpful include, but are not limited to, the following:

- Letter from a qualified healthcare professional, on letterhead which confirms a diagnosis and impact of the disability;
- Educational records (Individual Education Plan (IEP) or 504 plan;
- Veteran Records verifying condition and impact (rating sheet);
- Reports and assessments created by healthcare providers, psychologists, or the educational system (e.g., a psychoeducational evaluation); and
- Audiology report.

Documentation must be provided on official letterhead with contact information and dated. It should be signed by an evaluator who is unrelated to the student, and who possesses credentials that permit the evaluation of the disability. No hand-written notes or prescription pad notes will be accepted.

We may request additional documentation for students who are requesting a reasonable accommodation in Housing. In these cases, supporting documentation that speaks directly to on-campus housing accommodation request is required:

- A clear statement of the medical and/or psychiatric diagnosis and the functional limitations due to the condition as it relates to on-campus housing.
- State the specific accommodations that are needed in on-campus housing.
- Describe how the student's medical/psychiatric condition necessitates the need for the requested housing accommodation, as it relates to the student's disability.

Disability Services will meet with students who do not have documentation or who have not been formally diagnosed with a disability. We recommend you set up an Information Session with us to discuss your specific situation and explore referral options.

Documentation accepted by other institutions, agencies, and/or programs will not necessarily satisfy Disability Services requirements.

ADA Accommodation

When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to safety, he or she will be given the same consideration for admissions to the Institute. Applicant accommodations that pose a direct threat to the health, safety or pose a threat to the well-being of the applicant or others will not be granted.

The Institute will reasonably accommodate qualified individuals with a disability so that they can effectively benefit from the education unless doing so causes a direct threat to these individuals or others and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to the Institute. Potential students should notify their Admissions Representatives with any requests for accommodation(s) and current students should notify their Director of Education. All students are required to comply with the company's safety standards. Current students who pose a direct threat to the health or safety of themselves or other individuals will be placed on a Leave of Absence until an organizational decision has been made in regard to the student's immediate enrollment situation. [See Appendix B for the potential student procedure flow chart](#) and [Appendix C for the current student procedure flow chart](#).

Religious Accommodation

Students whose religious beliefs or practices conflict with his or her education, class schedule, or with The Institute's policy or practice on dress and appearance, or with other aspects of their education, and who seek a religious accommodation must submit a written request for the accommodation to his or her Program Supervisor. The written request will include the type of religious conflict that exists and the student's suggested accommodation(s).

The Director of Education will evaluate the request in conjunction with their Director of Education and/or Director of Academics, considering whether a conflict exists due to a sincerely held religious belief or practice and whether an accommodation(s) is available that is reasonable and that would not create an undue hardship on the Institute. Accommodation(s) may include a change in class schedule, allowing an

exception to the dress and appearance code, or modifying the uniform policy in a way that does not affect safety requirements, or other modifications to student requirements.

The Director of Education and the student will meet to discuss the request and the decision on an accommodation(s). If the student accepts the proposed religious accommodation, the Program Supervisor will implement the decision. If the student rejects the proposed accommodation, he or she may appeal following the student grievance policy and procedure outlined in the student catalog. [Please see Appendix D for procedure flow chart.](#)

Service Animal Accommodation

A “Service Animal” means any dog or miniature horse that is individually trained to do work or perform tasks for the benefit of a person with a disability, including a physical, sensory, psychiatric, intellectual, or other mental health disability. The work or tasks performed by a Service Animal must be directly related to the person’s disability, including but not limited to:

- Assisting individuals with low vision or blindness
- Alerting individuals who are deaf or hard of hearing
- Pulling a wheelchair or stabilizing a person’s gait
- Retrieving items such as medicine, food, or a telephone
- Recognizing and assisting a person having a seizure or who may be experiencing flashbacks or emotional trauma, such as from PTSD

When it is not readily apparent that a dog is a Service Animal, the Institute’s staff may only make two inquiries to determine whether the dog qualifies as a Service Animal. The inquiries are:

- Is the dog a service animal required because of a disability?
- What work or task has the dog been trained to perform?

Under the ADA, the service animal must adhere to the below:

- The animal must be harnessed, leashed, or tethered. However, if these devices interfere with the service animal’s work (when they are performing the work) or the individual’s disability prevents them from using these devices. In that case, the individual must maintain complete control of the animal through verbal commands, signals, or other effective controls.
- The animal cannot pose a direct threat to the health and safety of persons on the Institute campus.
- The handler is responsible for cleaning up after the animal.

For a student to request a service animal accommodation, they should complete the request form “*Student Reasonable Accommodation Request – Service Animal*”. This form is available by request from the Director of Education. [See Appendix E for the accommodation request form.](#)

Flexibility Accommodation

A student with a disability that is episodic in nature may have their ability to attend class and complete tests or assignments at the scheduled time occasionally impacted. Granting flexibility accommodations ensures that the student is not penalized for the effects of their disability, so long as the accommodation does not fundamentally alter the essential elements of the class. The Institute reviews qualifying documentation and class syllabi to make a determination if the accommodation(s) for flexibility is reasonable. The approved accommodations could include, but are not limited to, the below:

- Note-taking software utilization.
- Attendance exceptions
- Assignment extensions
- Breaks during class, as needed

Confidentiality

Requests for accommodation from students constitute an educational record and must only be disclosed on a need-to-know basis. The request should be processed through the above procedures, and any necessary documentation should be placed in the student's file. In addition, staff and faculty should not discuss the disability or the requests for accommodations unless the information is need-to-know. This includes during meetings or any type of open discussions that include staff who do not have a need-to-know status.

For further questions and assistance, please contact the Director of Education at your campus.

Appendix A: Student Reasonable Accommodation Request

Student Reasonable Accommodation Request

The purpose of this form is to assist the Institute in determining whether, or to what extent, a reasonable accommodation is required for a student with a disability or conflicting religious belief to perform one or more essential functions of their education safely and effectively. Please return the completed form to your Director of Education. *****Please attach appropriate supporting documentation if this request is in regards to a disability.*****

Student Name: _____

Program: _____

Campus: _____

Please describe as completely and specifically as possible the accommodation(s) you are requesting.

What are the limitations caused by your condition(s) or religious belief that you are currently experiencing? Please provide as much detail as you believe is relevant.

Regarding the limitations you noted above, what specific parts of your assigned responsibilities are difficult to perform?

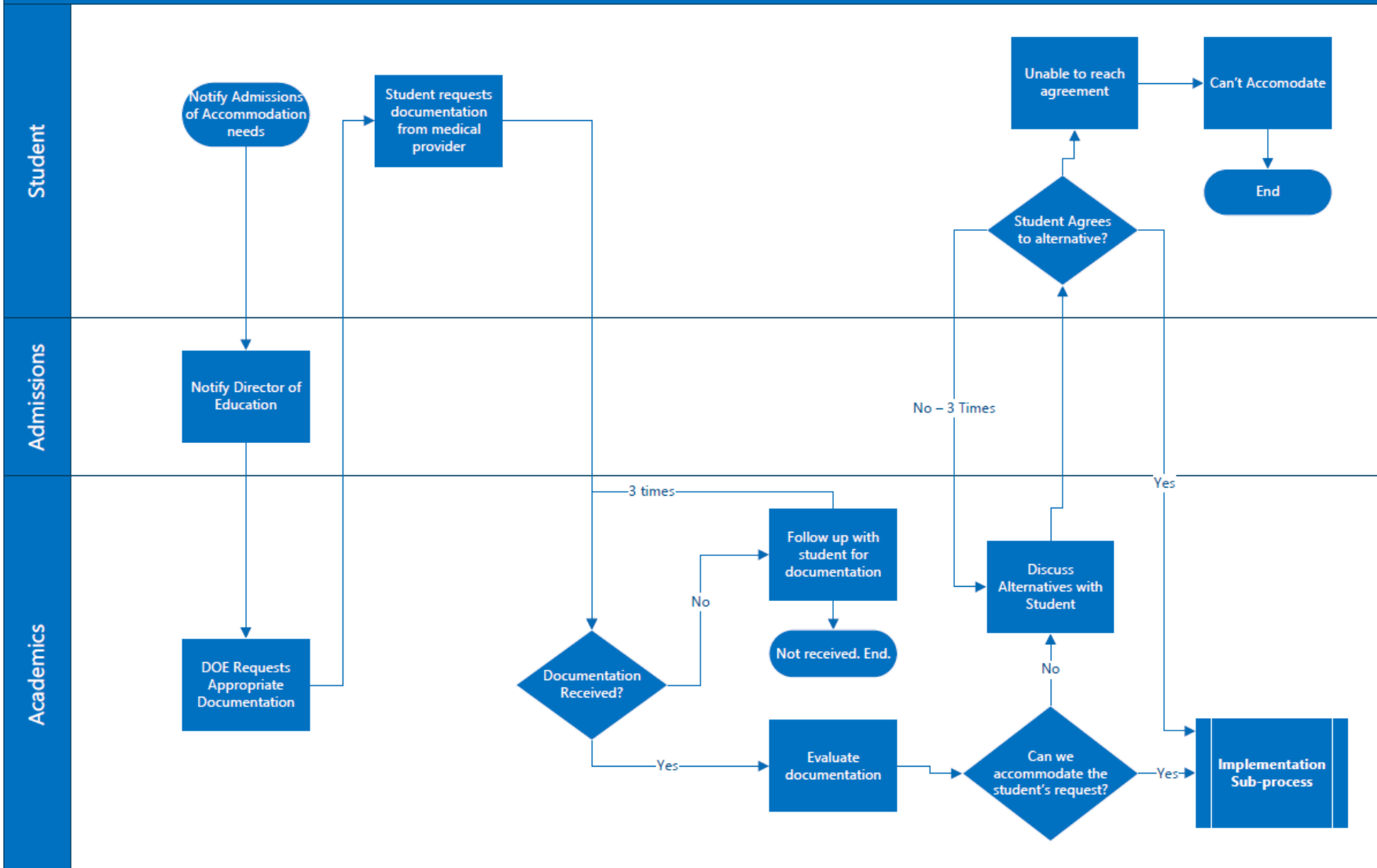
In order to facilitate our discussions to identify an effective accommodation(s), tell us what changes you feel are needed in order to carry out your responsibilities and to make it possible for you to continue to perform the essential functions of your education.

Student Signature: _____

Date: _____

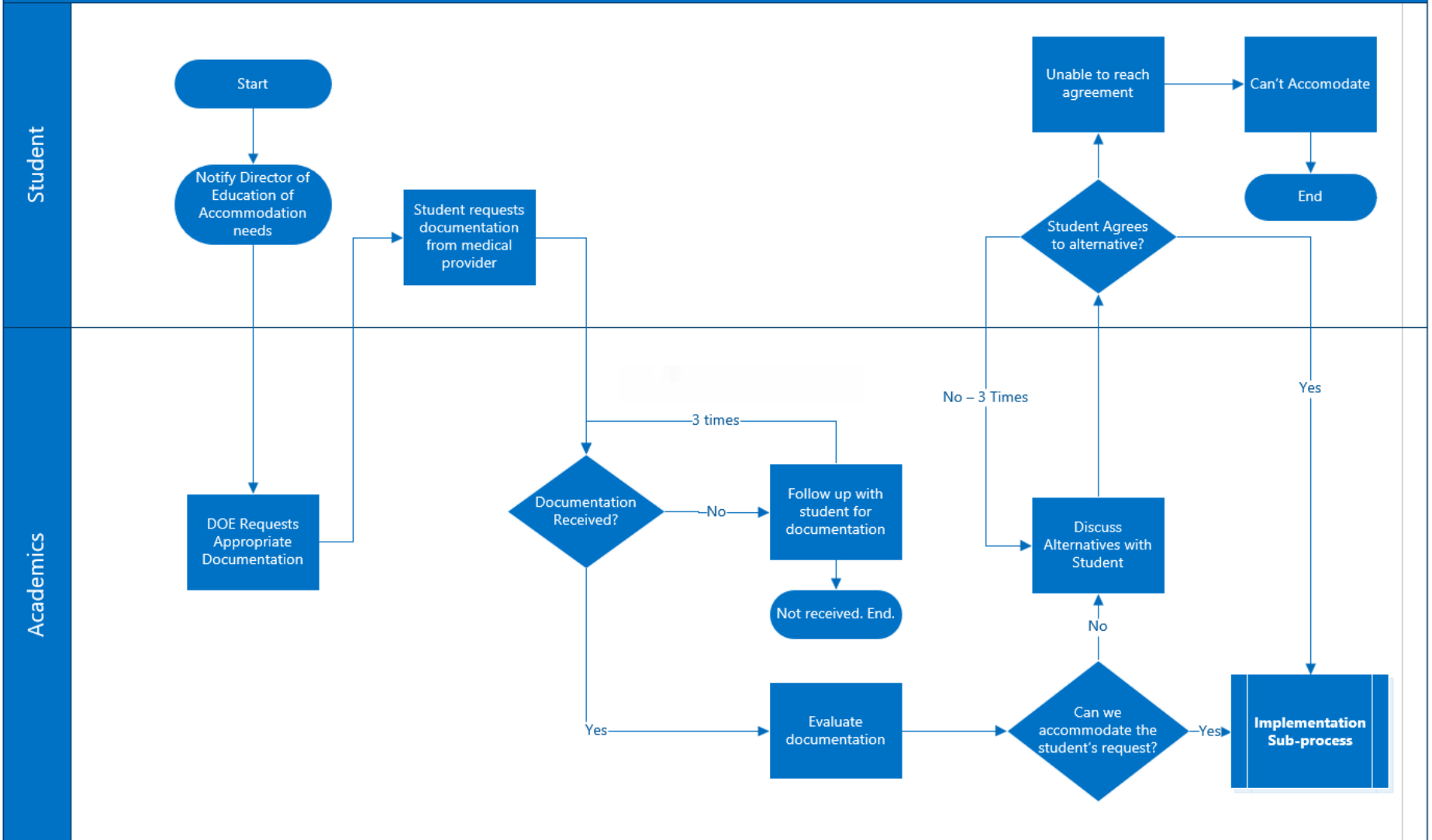
Appendix B: New (Potential) Student ADA Accommodation Process

New/Potential Student ADA Accommodations

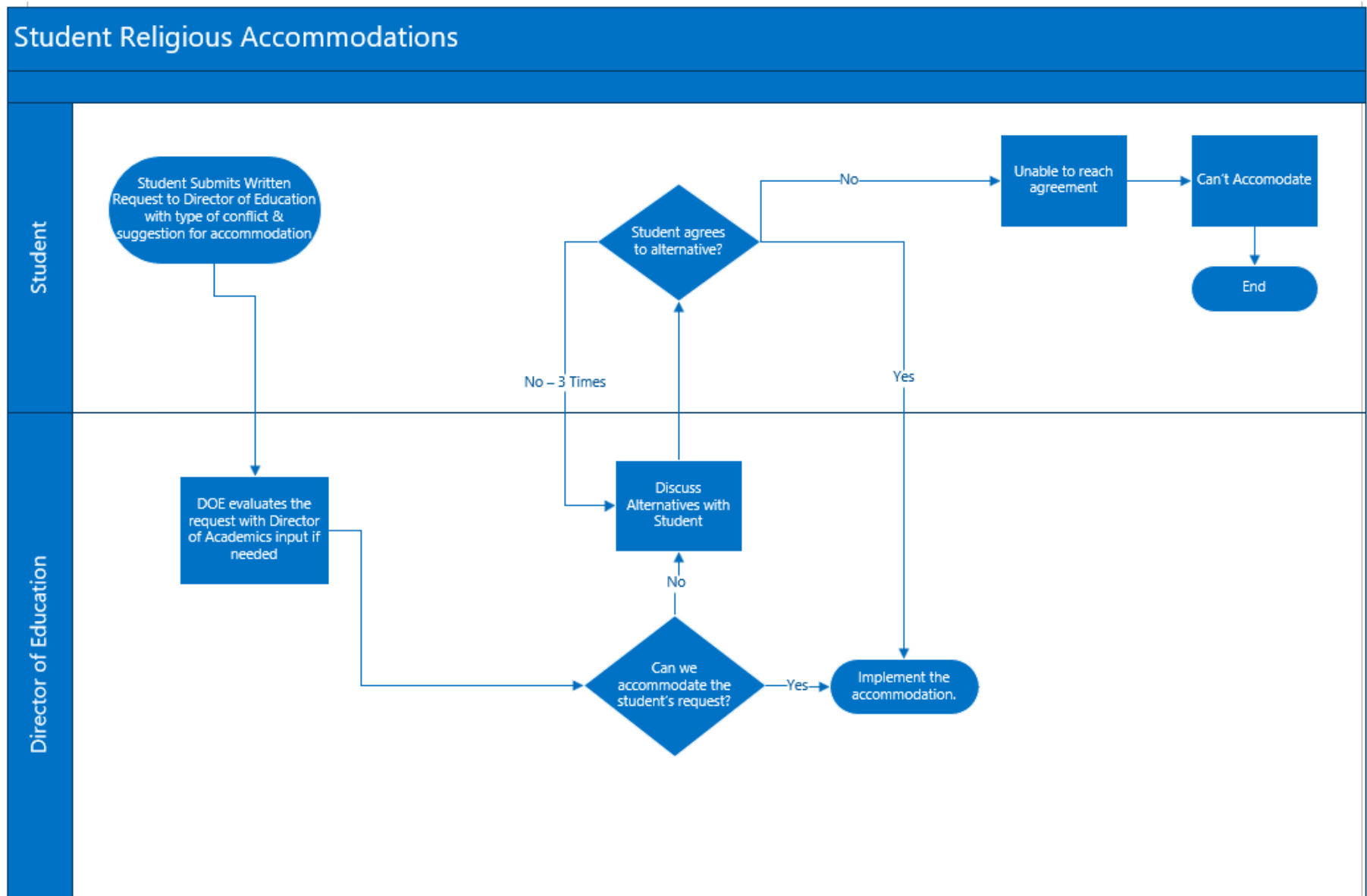


Appendix C: Current Student ADA Accommodation Process

Current Student ADA Accommodations



Appendix D: Student Religious Accommodation Process



Student Reasonable Accommodation Request – Service Animal

The purpose of this form is to assist the Institute in determining whether, or to what extent, a reasonable accommodation is required for a student with a disability to perform one or more essential functions of their program safely and effectively. Please return the completed form to the Director of Education on your campus.

If the animal is not a dog or a miniature horse, it is not a service animal. Conversely, a number of animals may be used as emotional support animals, which do not have the same rights and protections as service animals.

Student Name: _____ Program: _____

Is the animal: Service Animal Emotional Support Animal

Type of Animal (*Dog, Miniature Horse, Other*): _____

Is the service animal required because of a disability? Yes No

What work or task has the animal been trained to perform?

To facilitate our discussions to identify an effective accommodation(s), tell us what changes you feel are need to support you in your program.

If approved, please note that under the ADA, service dogs must be harnessed, leashed, or tethered. However, if these devices interfere with the service animal's work (when they are performing the work) or the individual's disability prevents them from using these devices, in that case, the individual must maintain complete control of the animal through verbal commands, signals, or other effective controls.

Student Signature: _____ Date: _____

Campus Management

Signature: _____ Name: _____ Date: _____

Approved: Yes No

Denial Reason: _____