

## Services for Students with Disabilities Policy & Procedures

### **I. Reasonable Accommodations**

Laurel Business Institute/Laurel Technical Institute (“LBI/LTI”) is committed to providing equal opportunity for students with physical, learning, or psychological disabilities and does not discriminate on the basis of disability in admission or access to its programs and activities. Individuals with disabilities are entitled to a reasonable accommodation to ensure that they have full and equal access to the educational resources of the school, consistent with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) (“Section 504”) and the Americans with Disabilities Act (42 U.S.C. § 12182) (“ADA”), their related statutes and regulations, and corresponding state and local laws. Qualified students with a disability are eligible to participate in any part of LBI/LTI’s programs or activities. To this end, LBI/LTI provides reasonable accommodations that do not constitute an undue burden or require a fundamental alteration of a course or program. LBI/LTI uses an interactive process to determine whether a requested accommodation is reasonable or would require a fundamental alteration of a course or program. This determination will be based on an individualized assessment of the student’s disability, the academic adjustment requested, and the nature of the course or program.

Reasonable accommodations may include academic adjustments, including but not limited to modification or alteration of course examination procedures, provision of auxiliary aids, modified attendance requirements, and/or extended time on assignments. Fundamental alterations are discussed in Part III of this Policy. Students with disabilities who have questions regarding academic adjustments should contact the Vice President of Education (“VPE”) listed below. The following procedures apply to student requests and VPE’s determinations regarding reasonable accommodations:

- A. Identification and Registration** – Once a student with a disability has been admitted to LBI/LTI, she/he should identify her/himself and register with the VPE. The student is encouraged to start preparing as early as possible as some accommodations may require significant planning in advance of the semester. Ideally, the student should seek reasonable accommodations before the start of the semester; otherwise, the student should seek reasonable accommodations as soon as possible thereafter. The contact information for the VPE is listed below:

Amy Braymer  
Vice President of Education  
200 Sterling Avenue  
Sharon, PA 16146  
724-983-0700  
[braymera@laurel.edu](mailto:braymera@laurel.edu)

LBI/LTI encourages students with disabilities to identify themselves to VPE by completing the confidential LBI/LTI Accommodations Questionnaire found [here](#).

- B. Documentation** – A student requesting reasonable accommodations must provide appropriate documentation and complete an assessment interview with VPE. The Documentation Guidelines for Students Requesting Accommodations (“Guidelines”) ensure that appropriate documentation supports requests for reasonable accommodations. The Guidelines are included in Part II of this Policy. Staff from VPE are available to consult with students and their Qualified Professionals, as defined in Part II of this Policy, regarding the requirements for documenting a disability. Please contact the VPE with any questions.
- C. Assessment Interview** – At the assessment interview, the VPE and the student will discuss the student’s individualized needs and review the documentation and recommendations provided by the student’s Qualified Professional.
- D. Interactive Process** – The VPE and the student will engage in an interactive process to determine the reasonable accommodations to be provided to the student. The interactive process requires input from a variety of constituents and occurs before accommodations are provided to ensure that the student’s individualized needs are met with respect to each individual course or a program of study. The process involves input from the student requesting accommodations, VPE staff, faculty members, department heads (as needed), the Academic Affairs Liaison (designated by the Chief Academic Officer and identified in Part III, Section B of this Policy), and the student’s Qualified Professional. VPE will undertake an individualized assessment of the student’s disability, the academic aid(s) and adjustment(s) requested, and the nature of the student’s course(s) or program(s). Based on information

gathered through the interactive process, VPE will make a professional determination of whether accommodations, aids, and/or adjustments are necessary and reasonable and, if so, what kind.

- E. Agreed upon Accommodations** – After engaging in the interactive process, the VPE will document the agreed upon accommodations in writing (the “Accommodation Letter”). A copy of the Accommodation Letter will be provided to the student to disseminate to her/his faculty members. VPE shall make the final determinations regarding all requests for reasonable accommodations. If a request for reasonable accommodations is denied, VPE will document that denial and provide the student with information detailing the reason for denial. For reference, additional guidelines to assist in requesting and determining the reasonableness of accommodations in the form of modified attendance and/or extended time on assignments are included as [Appendix A](#).
- F. Student’s Responsibilities** – The student is responsible for distributing the Accommodation Letter to the appropriate faculty members as soon as possible, and following the faculty member’s reasonable class rules and course requirements that do not conflict with the student’s reasonable accommodations. Should a conflict exist between a faculty member’s reasonable class rules and/or course requirements and an accommodation listed in the Accommodation Letter, the Accommodation Letter controls. Students and faculty members should contact the VPE with any concerns about such conflicts. Students should note that their failure to distribute the Accommodation Letter to faculty members may cause delay in LBI/LTI’s provision of accommodations. The student should keep a copy of the Accommodation Letter for her/his records.
- G. Questions from Faculty Members** – Any questions that a faculty member may have regarding the Accommodation Letter should be addressed to the VPE or the faculty member’s department head, who will then contact the VPE for clarification.
- H. Implementation of Accommodations** – As necessary, VPE will work in conjunction with faculty members and the student to assist with the implementation of the accommodations listed in the Accommodation Letter.
- I. Continuing Needs** – A student whose accommodations may vary from semester to semester should meet with the VPE in advance of the beginning of each semester to determine which accommodations are appropriate for that semester of course work. A student needing a semester-by-semester update of accommodations should communicate this need to VPE during the interactive process. It is the student’s responsibility to request an appointment to address continuing needs, and the student should do so as early as possible – ideally before the start of the semester – so that the student can receive the full benefit of any accommodations.
- J. Student Complaint Procedure** – Students with disabilities who have any concerns or complaints, including but not limited to concerns or complaints regarding a request for accommodations, must notify the VPE in writing by providing a detailed description of her/his concern or complaint as soon as practicable. The VPE will work with the student and the faculty member (if applicable) to resolve the issue as quickly as possible to endeavor to provide the least possible disruption to the student’s educational experience. The VPE will communicate their response in writing to the student. If the student believes that her/his concern or complaint was not successfully resolved with the VPE, she/he may submit a complaint to the Executive VP of Operations within ten (10) class days of receiving the VPE’s response. The Executive VP of Operations, in consultation with the Campus Director, will investigate the concern or complaint and provide the student with a written determination. The Executive VP of Operations’ determination is final. The Executive VP of Operations’ contact information is included below:

Douglas Decker  
Executive VP of Operations  
200 Sterling Avenue  
Sharon, PA 16146  
724-983-0700  
[ddecker@laurel.edu](mailto:ddecker@laurel.edu)

## II. Documentation Guidelines for Students Requesting Accommodations

A student requesting reasonable accommodations must provide appropriate documentation. These Guidelines are provided in the interest of ensuring that documentation of a disability supports requests for reasonable accommodations. The VPE is available to consult with students and Qualified Professionals, as defined below, regarding these Guidelines. For a list of Qualified Professionals, please see [Appendix B](#).

LBI/LTI does not provide or pay for services required to meet these documentation requirements. In order to ensure that aids or adjustments support the student's current needs, students are asked to provide **documentation that is no more than three years old** for disabilities that are nonobvious in nature. This may require that students undergo a reevaluation if their previous evaluation was more than three years ago. A student need only be reevaluated for her/his previously diagnosed disability. The issue of whether reevaluation is required is left to the discretion of the student's Qualified Professional. If the student's Qualified Professional determines that reevaluation is not necessary, the Qualified Professional should write to VPE stating the reasons for that determination.

### A. Minimum Documentation Guidelines

1. All documentation must be current and provide a diagnosis by an independent licensed professional, qualified in the appropriate specialty area (a "Qualified Professional").
2. Documentation should be accompanied by information substantially similar to that requested in the LBI/LTI Accommodations Questionnaire to ensure that important areas of documentation are fully addressed.
3. Documentation reports must be on professional letterhead, typed, dated, and signed.
4. Documentation should disclose the nature of the student's disability and the functional limitations resulting from the disability, as well as recommended accommodations.  
**Note:** A prior history of an accommodation, without a demonstration of a current need, does not in and of itself warrant the provision of a similar accommodation. Each accommodation recommended by a Qualified Professional should include a rationale. If an accommodation is not clearly identified in the diagnostic report, the Qualified Professional may be asked for clarification.
5. Qualified Professionals may suggest specific accommodations, but VPE will evaluate each proposed accommodation to determine what aids or adjustments are necessary and reasonable under the circumstances.
6. The Qualified Professional must be an impartial individual who is not a family member of the student or an employee or contractor of LBI/LTI.

**B. Learning Disabilities** – Evaluation of a learning disability should be made by a Qualified Professional who has comprehensive training and direct experience with the adolescent and adult populations with learning disabilities. For example, the following professions would generally be considered qualified to evaluate specific learning disabilities, provided that they have additional training and experience in the assessment of learning disabilities in adolescents and adults: clinical or educational psychologists; school psychologists; neuropsychologists; learning disabilities specialists; and medical doctors. Documentation of a learning disability must meet the Minimum Documentation Guidelines set forth in Section A of this Part II.

**C. Attention Deficit/Hyperactivity Disorder** – Students that are requesting aids or adjustments because of an ADD/ADHD diagnosis are required to submit documentation to enable VPE to determine whether their diagnosis meets the legal definition of disability. A diagnosis of ADD/ADHD does not automatically qualify a student for academic accommodations under the law. To receive reasonable academic accommodations, the student must provide current documentation from a psychiatrist, psychologist, or other Qualified Professional indicating that the disability substantially limits some major life activity, including learning. Students who were diagnosed and did not receive continuous medical or educational support may be required to have a comprehensive evaluation to determine whether academic accommodations are appropriate. Documentation of an ADD/ADHD diagnosis must meet the Minimum Documentation Guidelines set forth in Section A of this Part II.

- D. **Psychological Disabilities** – Psychological disabilities should be verified by documentation from a licensed mental health practitioner. Documentation must meet the Minimum Documentation Guidelines set forth in Section A of this Part II.
- E. **Physical Disabilities** – Non-obvious physical disabilities should be verified by documentation from a medical doctor or other Qualified Professional. Documentation of a physical disability must meet the Minimum Documentation Guidelines set forth in Section A of this Part II.

### III. **Fundamental Alterations**

- A. **Process** – In some instances, VPE may determine that a requested accommodation would result in a fundamental alteration of a course or program, in which case such accommodation will not be provided. VPE uses a deliberative process to determine whether a requested accommodation would result in a fundamental alteration of the course or program, based on an individualized assessment of the course or program. This process requires VPE to obtain input from the student and the faculty member and/or department head, and to consider the non-exhaustive issues set forth below. VPE will make the final determination regarding whether a fundamental alteration of the course or program would result from a requested accommodation, subject to the faculty member's ability to appeal that determination as described in Section B below.
  - 1. Identify the essential academic standards of the course; requirements that go to the very nature of the subject matter or that are of the utmost importance in achieving the course or program objectives.
  - 2. Articulate specific requirements that individual faculty members believe are fundamental to teaching the course or program, taking academic freedom into consideration.
  - 3. Identify the unique qualities of the course in relation to its overall objectives and any program in which the course is required.
  - 4. Engage in reasoned deliberation as to whether modification of the course or program would change the fundamental academic standards or other requirements of the course or program.
  - 5. Determine whether there are any alternatives to the fundamental academic standards or other requirements of the course or program that would still retain the essence of those fundamental academic standards or other requirements.
  - 6. Will the requested accommodation lower the academic standards of the course or program?
  - 7. Why is the standard that the faculty member believes will be lowered important to the course or program?
  - 8. Is the standard the better way (or the only way) to achieve the desired academic objective?
  - 9. Can a different method or requirement that will not be altered by the accommodation achieve the fundamental academic standards or other requirements?
  - 10. If not, why not?

The above list of statements and questions is not all-inclusive. VPE will continually engage with the student and the faculty member and/or department head and may pose additional questions so that it can determine whether a requested accommodation results in a fundamental alteration of a course or program. VPE will document the answers to these questions. After obtaining input from the student and the faculty member and/or department head, VPE will make the determination as to whether an accommodation would constitute a fundamental alteration based on an individualized assessment of the student's needs and the course or program.

- B. Faculty Appeal** – In the event that a faculty member or department head disagrees with VPE’s determination, she/he should immediately notify, in writing, the Executive VP of Operations. The Executive VP of Operations shall review VPE’s determination and the faculty member’s or department head’s concerns to determine whether the accommodation listed in the Accommodation Letter constitutes a fundamental alteration of a course or program. As promptly as possible, the Executive VP of Operations will provide VPE and the faculty member or department head with a written decision based on an individualized assessment of the student’s disability, the accommodation at issue, and the course or program. During this appeal process, the accommodation provided in the Accommodation Letter shall remain in place unless and until the Executive VP of Operations determines that the accommodation constitutes a fundamental alteration of the course or program. For purposes of this Policy, the Executive VP of Operations contact information is listed below:

Douglas Decker  
Executive VP of Operations  
200 Sterling Avenue  
Sharon, PA 16146  
724-983-0700  
[ddecke@laurel.edu](mailto:ddecker@laurel.edu)

## Appendix A

### **Additional Guidelines**

The guidelines provided below are not intended to encompass all of the accommodations that VPE can provide to a student. Instead, these guidelines are intended to provide additional information about certain accommodations that are commonly recommended by [Qualified Professionals](#) which, in some cases, can be complex to administer. This [Appendix A](#) is intended to assist students and faculty members in understanding how VPE will make determinations regarding these accommodations.

#### **I. Modified Attendance**

Class attendance is essential to the mastery and retention of course material, and students are expected to follow the attendance policy established by the faculty member in each class.

However, some students may have disabilities that result in a need to miss class in excess of a stated attendance requirement. A modified attendance accommodation may be provided on an individual, case-by-case basis, if recommended by the student's Qualified Professional and determined by VPE to be necessary and reasonable. If a modified attendance accommodation is provided, the terms and conditions of such accommodation will be detailed in the student's Accommodation Letter from VPE.

This accommodation **does not** apply to every student with an Accommodation Letter. Since each class and situation is different, the applicability and extent of the modification will be determined using an interactive process between VPE and the student, with appropriate input from the faculty member and/or the department head, at or before the start of the semester, or as soon as possible thereafter. Students are responsible for meeting with VPE and engaging in the interactive process so that VPE can determine a reasonable amount of additional absences, if any.

Students who miss class meetings for disability-related reasons are responsible for completing all missed class work. Students are also responsible for communicating closely with their faculty members through an agreed-upon notification system. This accommodation allows for a reasonable amount of additional absences and the ability to complete missed assignments, exams, and quizzes, in each case as specified in the Accommodation Letter.

Limitations of this accommodation may include the following:

- Unlimited and excessive absences may be unreasonable.
- Use of this accommodation is not permitted for seasonal illness and disabilities not documented through VPE. Students should address needs related to seasonal illnesses or other similar circumstances with their faculty members.

VPE will use the below non-exhaustive list of questions to determine whether a request for a modified attendance accommodation is reasonable under the circumstances and would not constitute a fundamental alteration of a course or program. VPE will seek input from the faculty member and/or the department head, as appropriate, prior to making its determination.

- A. Is there required classroom interaction between the faculty member and students, and among students?
- B. Do student contributions in class constitute a significant component of the learning process?
- C. Does the fundamental nature of the course rely upon student participation as an essential method for learning and/or student evaluation?
- D. To what degree does a student's failure to attend constitute a significant loss to the educational experience of other students in the class? E. What does the course description and syllabus say?  
*Note: Are there clear assignment dates included on the course syllabus and/or as part of the Learning Management System used for the course (e.g., Canvas)? Would the student be able to turn in work electronically if the student is absent on a day that an assignment is due?*
- E. What assessments are used to determine the final grade? What are the documented policies regarding classroom participation and attendance?

## II. Extended Time on Assignments

VPE recognizes the importance of, and promotes the practice of, good time management skills, organizational skills, and effective decision-making skills throughout students' journeys at LBI/LTI. However, accommodations providing extended time on assignments may be included in a student's Accommodation Letter – which will include specific information about the terms and conditions of such accommodations – if recommended by the Qualified Professional and determined by VPE to be necessary and reasonable.

Extensions for assignments may be a reasonable accommodation based on a student's disability. Examples of situations in which this accommodation may be reasonable include but are not limited to the following:

- An assignment was not listed on the syllabus initially and is given to students with one week or less to complete; and/or
- The assignment deadline is listed on the syllabus but students do not receive the necessary information to complete the assignment sooner than one week before the deadline.

This accommodation **does not** apply to every student with an Accommodation Letter. Since each class and situation is different, the amount of extended time provided will be determined using an interactive process between VPE and the student, with appropriate input from the faculty member and/or department head, at or before the start of the semester, or as soon as possible thereafter. Students are responsible for meeting with VPE and engaging in the interactive process so that VPE can determine a reasonable amount of extended time, if any.

Faculty members should refrain from providing students with “all the time they need” on assignments and instead should provide the specific accommodations included in the student's Accommodation Letter. Without establishing clear completion guidelines, this allowance could be setting students up for future stress and the possibility of getting so far behind that successfully completing the course is no longer feasible. Students and faculty members should also note that providing extended time for assignments gets more complicated near the end of each semester, and that assignment extensions that go beyond LBI/LTI's grade deadline date could pose significant challenges. However, when extended time on assignments is provided as an accommodation, VPE will work with the student and faculty member to overcome those issues.

As part of the interactive process, VPE will undertake an individualized assessment of the student's request to determine whether any limitations apply, and will seek input from the faculty member and/or department head as appropriate before making a final determination. Limitations of this accommodation may include the following:

- Courses with clear assignment completion dates on the syllabus and/or posted on the Learning Management System used for the course (e.g., Blackboard) and with complete information given to the student in advance (more than one week) may not be consistent with requests for extended time.
- Online discussion thread completion may not be consistent with requests for extended time.
- With courses that have many assignments that “build” on top of each other, extended time for assignments may not be reasonable.
- This accommodation may not alter the fundamental nature of the course or program.

### **Please contact the VPE with any questions:**

Amy Braymer  
Vice President of Education  
200 Sterling Avenue  
Sharon, PA 16146  
724-983-0700  
[braymera@laurel.edu](mailto:braymera@laurel.edu)

## Appendix B

### Qualified Professionals

Individuals requesting reasonable accommodation may be asked to provide medical documentation substantiating his/her physical and/or mental impairment(s) and/or the need for the requested accommodation(s), including but not limited to when the limitation or impairment is not readily apparent and/or a requested accommodation does not clearly relate to the impairment(s). Such documentation should specify that a student has a physical or mental impairment and how that impairment substantially limits one or more major life activities. In general, the supporting documentation must be dated less than three years from the date a student requests a reasonable accommodation, and must be completed by a qualified professional in the area of the student's disability, as enumerated below:

<b>Disability</b>	<b>Qualified Professional</b>
Physical disability	MD, DO
Visual impairment	MD, ophthalmologist, optometrist
Mobility, orthopedic impairment	MD, DO
Hearing impairment	MD, Audiologist (Au.D) *audiology exam should not be more than a year old
Speech and language impairment	Licensed speech professional
Learning disability	PhD Psychologist, college learning disability specialist, other appropriate professional
Acquired brain impairment	MD neurologist, neuropsychologist
Psychological disability	Psychiatrist, PhD Psychologist, LMFT or LCSW
ADD/ADHD	Psychiatrist; PhD Psychologist, LMFT or LCSW
Other disabilities	MD who practices or specializes within the field of the disability.

Documentation used to evaluate the need and reasonableness of potential accommodations may include a licensed professional's current medical diagnosis and date of diagnosis, evaluation of how the student's disability affects one or more of the major life activities and recommendations, psychological and/or emotion diagnostic tests, functional effects or limitations of the disability, and/or medications and recommendations to ameliorate the effects or limitations. The school may request additional documentation or testing as needed.

After the Vice President of Education receives the Request Form and the required documentation, she will engage the student or applicant in an interactive process to determine what accommodations may be appropriate.

If the student or applicant is denied any requested accommodation, he/she may file a grievance using the Grievance Process below or he/she may file a complaint with the [U.S. Department of Education's Office for Civil Rights](#) or a similar state entity. The school will make appropriate arrangements to ensure that a person with a disability is provided other accommodations, if needed, to participate in this grievance process. The Campus Director will be responsible for such arrangements.