



POLICY AND PROCEDURES FOR STUDENT DISABILITY ACCOMMODATION REQUESTS

St. James School of Medicine is committed to ensuring that no qualified student with a properly documented disability is excluded from participation in, subjected to discrimination in connection with, or denied the benefits of the medical sciences education program or activity due to the student's disability. To that end, SJSM provides reasonable accommodations to enable qualified students with properly documented disabilities equal access to the School's programs and activities.

The Policy and Procedures for Student Disability Accommodation Requests (the "Policy") set forth the policy and procedures applicable to student disability accommodation requests. It applies to any disability accommodation request made by any medical student, regardless of the type of disability involved and regardless of the level of the program or activity in which the student is enrolled and/or participating.

Where and How Students Can Request Disability Accommodations

All student disability accommodation requests must be made to the Admission Committee/Dean. To initiate a request, a student should complete an interview and submit a recommendation from a licensed health professional.

Submission of these forms will begin the processes of determining (1) whether the student has a properly documented disability and, if so, (2) what reasonable accommodations SJSM will provide to the student.

The Admission Committee/Dean may solicit input from other faculty regarding accommodation requests. The Dean of Clinical Sciences and/or the Dean of Basic Sciences are the school representatives authorized to determine whether a student has a properly documented disability and, through the interactive process, what reasonable accommodations SJSM may provide to the student. Accommodations are reasonable when they do not fundamentally alter the nature of a program or service and do not represent an undue burden.

The Timing of Accommodation Requests

Although a student may make an accommodation request at any time, SJSM strongly encourages students to make requests as early and as far in advance as possible to allow adequate time for consideration and proper documentation of the disability. The interactive process will determine what reasonable accommodations SJSM will provide to the student and implementation of those accommodations. SJSM strongly encourages the student to request the reasonable accommodation to the Dean as soon as possible in advance of the need for the reasonable



accommodation. *Absent significant extenuating circumstances, SJSM will not consider or implement any retroactive disability accommodations.*

Determination of Whether a Student Is Qualified and Has a Properly Documented Disability

Before determining what reasonable disability accommodation(s) SJSM will provide to a qualified student, SJSM must determine whether that student is a qualified student with a properly documented disability.

A qualified student is one who, with or without reasonable disability accommodation, is able to meet the essential requirements -- including but not limited to technical standards of the medical program -- for participation in a program or activity.

A person with a disability is any person who has a physical or mental impairment which substantially limits one or more major life activities. *Major life activities* are functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, concentrating, thinking, and working as well as major bodily functions such as normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, immune system, and reproductive functions. This list is not exhaustive.

A student requesting a disability accommodation must provide the required documentation as described below.

Required Documentation

Documentation of the requesting student's disability shall be obtained at that student's expense and must meet the criteria set forth in this Policy. The Dean has developed Guidelines for Documenting an Attention Deficit/Hyperactivity Disorder; Guidelines for Documenting A Psychiatric Disability; Guidelines for Documenting A Learning Disability; and Guidelines for Documenting A Physical Disability or Other Health-Related Condition. These guidelines, which are incorporated herein, can be found in the SJSM student handbook and are attached as Appendix 1.

Generally, the following is required:

- **Current Documentation:** The current impact of a disability upon the student is at the crux of determining a reasonable accommodation and as such, documents submitted to support an accommodation request must be current.
- **Comprehensive Evaluation:** The student must include documentation of an evaluation of the student's disability. The evaluation must be conducted by a qualified professional and must provide information in five areas:



- (1) a specific medical diagnosis of a physical, mental, or learning disability;
- (2) a description of how the diagnosis was confirmed based on established diagnostic criteria using diagnostic testing and methods currently utilized in professional practices within the relevant field;
- (3) a description of how the disability limits a major life activity and of the expected duration of the limitation;
- (4) the requesting student's history with the disability; and
- (5) specific recommendation(s) for reasonable accommodations and an explanation of the way in which the proposed accommodation will allow the student equal access to the programs and/or activities in question.

Qualified Professional: The documentation must include the professional credentials of the evaluator, including their licensure and area of specialization. Additional information about their experience with the diagnosis and treatment of adults in the appropriate field is recommended. The evaluator should not be a family member.

Evaluation of Accommodation Requests and Determination of Reasonable Accommodations

As part of the interactive process, the Dean may confer with the student's program to determine whether the student is an otherwise qualified student. If the Dean determines that the student requesting accommodation is qualified and has a properly documented disability, the Dean will then continue to engage in an interactive process with the student, course directors, faculty and staff and, as appropriate, the qualified professional who provided the disability documentation to determine what reasonable accommodations SJSJSM will provide to the student. *Reasonable accommodations* are those that do not lower or substantially modify essential program or activity requirements; fundamentally alter the nature of a school service, program, or activity; or result in an undue financial or administrative burden on SJSJSM.

Letters of Accommodation

The Dean will provide to the student and to the Course Director the student's letter of accommodation detailing any accommodations SJSJSM will provide to the student. The student is responsible for ensuring that letters of accommodations are provided to faculty members and employees who the student needs to implement the accommodations.

Requests for Modification or Continuation of Accommodations

It is the requesting student's responsibility to inform the Dean or the Course/Clerkship Director of any changes to the disability or to request modifications to approved accommodations. Similarly, it is the student's responsibility to request continuation of the approved



accommodations beyond the time period set forth in the letters of accommodation. To request a continuance or modification, students must re-submit a Request for Consideration.

Confidentiality

The Dean is responsible for information disclosed by a student seeking accommodations. The Dean is responsible for maintaining this information in confidential locked files separate from the student's academic file. Disability information is shared with faculty and staff on a limited "need to know" basis. The confidential file is maintained for seven years. The file is then shredded.

Appeals / Grievances

Students who are denied requested accommodations and/or believe that they have been discriminated against or harassed on the basis of their disability may appeal the denial or file a discrimination or harassment complaint with the Provost.



Appendix 1

- Guidelines for Documenting an Attention Deficit/Hyperactivity Disorder;
- Guidelines for Documenting a Psychiatric Disability;
- Guidelines for Documenting a Learning Disability;
- Guidelines for Documenting a Physical Disability or Other Health-Related Condition

ST. JAMES SCHOOL OF MEDICINE GUIDELINES FOR DOCUMENTING AN ATTENTION DEFICIT/HYPERACTIVITY DISORDER

In order to standardize the process for requesting accommodations, SJSM has adopted the ADHD documentation guidelines that are generally in agreement with the guidelines followed by the Educational Testing Service. These guidelines can be found on the *ETS* website, <https://www.ets.org/disabilities/documentation/>

Students and parents are urged to refer professional evaluators to these guidelines before submission of documentation for an accommodation request. Essential features of these guidelines are:

- **A qualified professional must conduct the evaluation.** The following professionals would generally be qualified to evaluate and diagnose ADHD provided that they have comprehensive training in the differential diagnosis of ADHD in the adolescent or adult population: licensed clinical, school and neuropsychologists, psychiatrists and other relevantly trained medical doctors. It may be appropriate to use a clinical team approach consisting of educational, medical and psychology professionals with training in the evaluation of ADHD in adolescents and adults.
- **Up-to-date documentation.** For students, the diagnostic evaluation must have been completed within 3 years.
- **Relevant testing information must be provided.** Neuropsychological or psychoeducational assessment is important in determining the current impact of the disorder on the student's ability to function in academic settings. Cognitive tests, achievement tests and rating scales should complement clinical interviewing to aid with differential diagnosis and establishing a "substantial limitation" in the major life activity of learning. An individually-administered intelligence scale, preferably the Wechsler Adult Intelligence Scale (WAIS-IV or latest edition); an individually-administered, comprehensive test of academic achievement such as the Woodcock-Johnson Tests of Achievement or the Wechsler Individual Achievement Test (latest editions); subtest, scale, and



total scores from all tests administered, as well as an interpretation of the results should be included.

- Students with ADHD who anticipate special academic needs should contact the DS as soon as possible. Because of the amount of time required to respond to requests for accommodations, it is strongly recommended that, when possible, students **submit documentation of their disabilities at least two months** before attending SJSM. If the information is not received before attendance, processing time may be lengthier given the volume of requests received after the semester begins.

Documentation should be sent to:

Dean of Basic/ Clinical Sciences
St. James School of Medicine

Records are kept confidential per DS policy (on the website) but are accessible as needed by DS and Student Health Services staff as part of the accommodations process.

ST. JAMES SCHOOL OF MEDICINE GUIDELINES FOR DOCUMENTING AN PSYCHIATRIC DISABILITY

In order to standardize the process for requesting accommodations, SJSM has adopted the documentation guidelines that are generally in agreement with the guidelines followed by the Educational Testing Service. These guidelines can be found on the *ETS* website, <https://www.ets.org/disabilities/documentation/>

Students and parents are urged to refer professional evaluators to these guidelines before submission of documentation for an accommodation request. Essential features of these guidelines are:

- **A qualified professional must conduct the evaluation.** The following professionals would generally be qualified to evaluate and diagnose psychiatric disabilities provided that they have comprehensive training in the differential diagnosis of psychiatric disabilities in the adolescent or adult population: licensed clinical, school and neuropsychologists, psychiatrists and other relevantly trained medical doctors. It may be appropriate to use a clinical team approach consisting of educational, medical and psychology professionals with training in the evaluation of psychiatric disabilities in adolescents and adults.
- **Up-to-date documentation.** Given the nature of most psychiatric disabilities, a current evaluation is typically one completed **within the last 12 months**.



- **Relevant testing information must be provided.** A comprehensive evaluation must include a specific diagnosis with alternate diagnoses ruled out. This may include standardized psychoeducational assessment measures. The evaluation should include a detailed description of current symptoms as they relate to the classroom and academic settings with a discussion of the anticipated impact of psychotropic medication on academic settings. The evaluation should also include relevant information about current treatment, recommendations for accommodations with accompanying rationale, a description of the expected impact and progression of the condition over time. The evaluation should include a discussion of any history of the use of accommodations, including onset and consistency of need for accommodations.
- Students with psychiatric disabilities who anticipate special academic needs should contact the DS as soon as possible. Because of the amount of time required to respond to requests for accommodations, it is strongly recommended that, when possible, students **submit documentation of their disabilities at least two months** before attending SJSM. If the information is not received before attending SJSM, processing time may be lengthier given the volume of requests received after the semester begins.

Documentation should be sent to:

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ST. JAMES SCHOOL OF MEDICINE GUIDELINES FOR DOCUMENTING A LEARNING DISABILITY (LD)

In order to standardize the process for requesting accommodations, SJSM has adopted the Learning Disability documentation guidelines that are generally in agreement with the guidelines followed by the Educational Testing Service. These guidelines can be found by following the Resources for Test Takers with Disabilities and Health-related Needs Link found on the ETS website, <https://www.ets.org/disabilities/documentation/>

Students and parents are urged to refer professional evaluators to these guidelines before submission of documentation for an accommodation request. Essential features of these guidelines are:



- **A qualified professional must conduct the evaluation.** The following professionals would generally be qualified to evaluate and diagnose Learning Disability provided that they have comprehensive training in the differential diagnosis of LD in the adolescent or adult population: licensed clinical, school and neuropsychologists, psychiatrists and other relevantly trained medical doctors.
- **Up-to-date documentation.** For students, the diagnostic evaluation must have been completed within 3 years prior to attending SJSM.
- **Relevant testing information must be provided.** Neuropsychological or psychoeducational assessment is important in determining the current impact of the disorder on the student's ability to function in academic settings. Cognitive tests, achievement tests and rating scales should complement clinical interviewing to aid with differential diagnosis and establishing a "substantial limitation" in the major life activity of learning. An individually-administered intelligence scale, preferably the Wechsler Adult Intelligence Scale (WAIS-IV or latest edition); an individually-administered, comprehensive test of academic achievement such as the Woodcock-Johnson Tests of Achievement or the Wechsler Individual Achievement Test (latest editions); subtest, scale, and total scores from all tests administered, as well as an interpretation of the results should be included.
- Students with Learning Disabilities who anticipate special academic needs should contact the Learning Assistance Center & Disability Services as soon as possible. Because of the amount of time required to respond to requests for accommodations, it is strongly recommended that, when possible, students **submit documentation of their disabilities at least two months** before attending SJSM. If the information is not received before matriculation, processing time may be lengthier given the volume of requests received after the semester begins.

Documentation should be sent to:

Dean of Basic/ Clinical Sciences
St. James School of Medicine

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ST. JAMES SCHOOL OF MEDICINE GUIDELINES FOR DOCUMENTING A PHYSICAL DISABILITY OR HEALTH-RELATED CONDITION

In order to standardize the process for requesting accommodations, SJSM has adopted the documentation guidelines that are generally in agreement with the guidelines followed by the Educational Testing Services. These guidelines can be found on the ETS website, <https://www.ets.org/disabilities/documentation/>

Students and parents are urged to refer professional evaluators to these guidelines before submission of documentation for an accommodation request. Essential features of the guidelines are:

- **A qualified professional must conduct the evaluation:** The following professionals would generally be qualified to evaluate and diagnose physical disabilities and chronic health conditions: medical doctors, surgeons, chiropractors, optometrists, audiologists, physical therapists, speech therapists, neuropsychologists, and other relevantly trained health care professionals qualified to make such diagnoses.
- **Up-to-date documentation:** Because accommodations are based on the current impact of the disability, the documentation must address the current level of functioning and need for each requested accommodation. If documentation is more than 6 months old, then the student must also submit a letter from a qualified professional providing an update on the diagnosis and a description of the student's current functional limitations. If the condition is permanent or unchanging in nature (e.g., cerebral palsy), then a statement from a qualified professional should suffice, as long as it indicates that the functional impact of the disability or chronic health condition is unchanging or permanent. If the condition is episodic or transitory (e.g., lupus), then documentation should address the frequency and duration of the student's current functional limitations and need for accommodations.
- **Include a rationale for each accommodation or device:** A link between the requested accommodation and the student's current functional limitation should be established.
- Students with physical disabilities and health-related conditions who anticipate special academic needs should contact the DS as soon as possible. Because of the amount of time required to respond to requests for accommodations, it is strongly recommended that, when possible, students **submit documentation of their disabilities at least two months** before attending SJSM. If the information is not received before attending SJSM, processing time may be lengthier given the volume of requests received after the semester begins.

Documentation should be sent to:



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