

**Purpose:**

**To ensure compliance with Section 504 of the Federal Rehabilitation Act of 1973 and the ADA of 1990.**

Pennsylvania College of Health Sciences is committed to complying with the obligations under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act, as amended, and confirms its commitment to ensure equal educational opportunities and access to students with disabilities.

**Procedure:**

1. Individuals applying for admission to any PA College program must meet the physical and psychosocial requirements of that academic program, as detailed in the “Core Performance Standards” (see below), with or without reasonable accommodation. Reasonable accommodations for disabilities will be determined on an individual basis.
2. No questions regarding disabilities will appear on any program admission forms. Students are encouraged, following enrollment, to disclose any disability requiring accommodation. Students who disclose a disability directly to faculty members will be referred to the PA College ADA/504 Coordinator.
3. To verify and address the needs of a student reporting a disability, the following procedures will be followed:
  - a. Students seeking an accommodation must contact the PA College ADA/Section 504 Coordinator at [eashley2@pacollege.edu](mailto:eashley2@pacollege.edu).  
The following procedures will be followed:
    - b. Proper documentation of a disability must be submitted typed on official letterhead and signed by the appropriate health care provider according to the procedures outlined below. Initial documentation must be current (within the previous 12 months). Periodic updates may be required.
      - 1) **Physical Disabilities:** Letter from a health care provider describing the disability, associated functional limitations and recommendations for reasonable, effective accommodations for the classroom and clinical setting. Specific requirements for additional documentation regarding visual, hearing and mobility impairments follow.
        - a) Visual Impairment: Include a statement about the medical condition explaining the extent of the visual fields, the degree of visual acuity, whether the condition is stable or progressive, and recommended visual aids and other reasonable accommodations.
        - b) Hearing Impairment: Include an audiologist’s report with results of an audiogram, type of hearing loss (conductive, sensory or neural), and the degree of hearing loss. Documentation should identify the types of aids/assistance recommended to accommodate the student.
        - c) Mobility Impairment: Include a letter from a health care provider that identifies the type of disability, a statement of the functional limitations caused by the disability, and a description of the reasonable accommodations recommended.
      - 2) **Health Related Disabilities:** Letter from a physician including the functional limitations, whether the condition is stable or progressive, and any anticipated side effects from

medication. Additional information should be provided regarding situations that may exacerbate the condition.

- 3) **Psychological Disabilities:** Report or letter from a licensed psychologist or psychiatrist including the following information:
  - a) Statement of DSM-V-TR diagnosis
  - b) Summary of assessment procedures used to make the diagnosis
  - c) Description of present symptoms and related fluctuating conditions/symptoms
  - d) Identify any current medications that may cause impairment or impact the ability to learn.
  - e) Description of functional limitations and recommended reasonable, effective accommodations relevant to the diagnosis
  
- 4) **Learning Disabilities:** There must be clear and specific evidence and identification of a learning disability. Individual “learning styles” and “learning differences” do not constitute a learning disability. The professional conducting assessments and rendering diagnoses of specific learning disabilities must be qualified to do so. Trained and certified and/or licensed psychologists, learning disabilities specialists and educational therapists may be involved in the process of assessment. Experience working with an adult population is essential. Diagnostic reports must include the names and titles of the evaluators as well as the date(s) of testing.

The following guidelines are provided to assure that evaluation reports are appropriate to document eligibility and support requests for reasonable accommodations and appropriate academic adjustments.

- a) **Diagnostic Interview:** By a qualified evaluator that includes historical information of learning difficulties. The evaluation report must also include a comprehensive diagnostic interview that addresses relevant background information supporting the diagnosis, including developmental history and academic history.
- b) **Testing:** Testing must be current (within past 3 years) or after age 18. Because the provision of reasonable accommodations and services is based upon assessment of the current impact of the student’s disabilities on academic performance, it is in a student’s best interest to provide recent and appropriate documentation. Test scores/data should be included in the documentation and must be comprehensive. It is not acceptable to administer only one test for the purpose of diagnosis. Evidence of comprehensive testing such as the following examples:
  - (1) **Aptitude:** The Wechsler Adult Intelligence Scale (Revised) (WAIS-III) with subtest scores is the preferred instrument. The Woodcock-Johnson-Psycho-Educational Battery-Revised: Tests of Cognitive Ability or the Stanford-Binet Intelligence Scale: Fourth Edition are acceptable.
  - (2) **Achievement:** Current levels of functioning in reading, mathematics and written language are required. Acceptable instruments include the Woodcock-Johnson Psycho Educational Battery-Revised: Tests of Achievement; Stanford Tests of Academic Skills; Scholastic Ability Test for Adults, or specific achievement tests such as the Test of Written Language-2, Woodcock Reading Mastery Tests-Revised, or the

Stanford Diagnostic Mathematics Test. The Wide Range Achievement Test is NOT a comprehensive measure of achievement and therefore is not suitable as the sole measure of achievement.

- (3) Information Processing: Specific areas of information processing (e.g. short- and long-term memory; sequential memory, auditory and visual perception/processing; processing speed) must be assessed. Use of subtests from the WAIS-III or the Woodcock-Johnson Tests of Cognitive Ability is acceptable.

This is not intended to be an exhaustive list or to restrict assessment in other pertinent areas such as vocational interests and aptitudes.

- c. If documentation of a disability is determined to be inadequate, the ADA/504 Coordinator will notify the student regarding needed clarification and/or further documentation.
- d. Students seeking reasonable accommodations will be asked to sign a Release of Information form to permit the ADA/504 Coordinator to disclose information that is necessary to evaluate the student's request for accommodation and determine what accommodations are appropriate.
- e. The ADA/504 Coordinator shall notify the VP of Strategic Enrollment Management (or designee) of the student's request for accommodation and medical documentation filed in support of the request.
- f. The VP of Strategic Enrollment Management (or designee) will determine what accommodations can be approved and notify the ADA/504 Coordinator in writing of this decision. In reaching this decision, the VP of Strategic Enrollment Management will engage in an interactive process to identify accommodations that will allow equal access to the College's programs and services.
- g. The student will be provided with a form, signed by the VP of Strategic Enrollment Management (or designee), listing the accommodations to which the student is entitled. It is the student's responsibility to distribute copies of this form to faculty and/or staff who have the obligation to provide the accommodations.
- h. Accommodations will not be implemented until the faculty or staff member has received a copy of the approved Academic Accommodations form from the student. Accommodations are not retroactive.
- i. Accommodations are approved for the semester(s) listed on the Academic Accommodations form. Accommodations granted for clinical, laboratory, and other experiential learning components of the curriculum are tailored to a specific course and/or clinical experience and usually expire at the conclusion of that course/clinical.
- j. If an issue arises concerning the provision of the approved accommodations, the student will seek assistance from the ADA/504 Coordinator.
- j. If the "Core Performance Standards" (see *Student Handbook*) cannot be achieved by the student, either with or without reasonable accommodation, the faculty reserves the right to dismiss the student from the course.
- k. If a student determines that the actions of the ADA/504 Coordinator, VP of Strategic Enrollment Management (or designee), and/or faculty/staff are not adequate, the student has the right to follow PA College's internal grievance policy and/or file an ADA or 504 complaint with the Office of Civil Rights (OCR) of the U.S. Department of Education.

Pennsylvania College of Health Sciences  
ADMINISTRATIVE POLICY STATEMENT

Issued: 11/20/00  
Last Revised: 04/21/22  
Last Reviewed: 04/21/22

Policy 10.2.3

Section 504 and ADA Compliance

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For further information regarding essential eligibility requirements in PA College academic programs please refer to **Core Performance Standards** in the Student Handbook.

<b>Audience:</b>	Students
<b>Date Issued:</b>	11/20/00
<b>Date Revised:</b>	06/10/14, 05/11/15, 03/07/17, 01/30/18, 04/21/22
<b>Date Reviewed:</b>	06/10/14, 05/11/15, 03/07/17, 04/21/22
<b>Owner:</b>	ADA/504 Coordinator