



EMPLOYEES AND STUDENTS WITH DISABILITIES POLICY

I. Purpose:

Compass Career College recognizes and accepts its obligations under Title VII of the Civil Rights Act of 1964, as amended, the Age Discrimination in Employment Act of 1967, as amended, Executive Order 11246, the Louisiana Rehabilitation Act of 1973 (Sections 503 and 504), the Vietnam Era Veterans Readjustment Assistance Act of 1974, the Americans with Disabilities Act of 1990, the Civil Rights Act of 1991, and the ADA Amendments Act of 2008 prohibiting discrimination and requiring the school to provide reasonable accommodations to qualified disabled employees and students in all employment and school programs and activities. The College is committed to the principle of providing the opportunity for learning and development of all qualified individuals without regard to race, sex, religion, color, national origin, age, disability, marital status, veteran status for employment, admission to, or participation in the programs and activities which the College and/or their clinical agencies sponsor or operate.

The College is committed to this policy because it is believed to be morally right and in accordance with state and federal laws. All Compass Career College personnel with responsibility for recruitment, appointment, placement, evaluation, admission, transferring or any other aspect of student or personnel management are charged with the responsibility of seeing that this policy is successfully implemented by giving it full support through active cooperation and example. All such persons shall be evaluated on the basis of their efforts and results in addition to the usual standards of performance. Persons who fail to adhere to this policy are subject to administrative disciplinary actions. The College will periodically review its actions to ensure compliance with this policy.

II. Policy:

It is the policy of Compass Career College to comply with all federal and state laws concerning employment and education of persons with disabilities. It is the policy of the College to recruit the best individuals available in accordance with appropriate state and federal laws and acceptable human resources practices.

Student and/or Employee Rights and Responsibilities:

Compass Career College does not discriminate against applicants, students, and/or employees on the basis of disability, including HIV. All applicants, students, and/or employees with disabilities, including HIV, have an equal opportunity to participate in or benefit from the goods, services, facilities, privileges, advantages, or accommodations provided by the College.

To receive any reasonable accommodation(s) for a student or employee disability, individuals must self-identify. Employees and students must self-disclose, request accommodations, and request a meeting with the Director of College. Students and employees must acquire the necessary documentation in order to receive reasonable accommodations. Accommodations are provided only after the process has been

completed. Courses completed with Compass Career College prior to self-disclosure and a request for accommodation will not be considered for re-evaluation of grades.

No student or employee shall be retaliated against for seeking accommodation under this policy or for participating in any complaint procedures brought against the College for alleged noncompliance with the policy.

III. Procedure:

Compass Career College will reasonably accommodate qualified individuals with a disability so they can perform the essential functions of a job, or the essential functions of learning as a student.

Process for Accommodation:

Step One: Self Disclosure. Self-disclosure and requesting accommodations are the first steps in advising Compass Career College of a student or employee disability and assuring reasonable accommodations will be made while pursuing employment or academic endeavors with Compass Career College. Submitting a signed *Employee/Student Self-Disclosure Statement* begins the process. As many accommodations may require time and resources to arrange, students are encouraged to self-identify as soon as possible.

Step Two: Documentation. Compass Career College requires documentation from a certified diagnosing professional dated no more than three years prior to the student's start date, or employee's date of hire. Students and employees should obtain the *Employee/Student Release of Information* form, which allows the diagnosing professional to send Compass Career College documentation supporting the student or employee's disability and complete the *Employee/Student Disability Information/Verification* form. If documentation exists but is more than three years old, the student or employee must meet with the Director of College.

Documentation Guidelines:

Students/Employees with Disabilities who are seeking accommodations from Compass Career College are required to submit documentation to the Director of College to verify his/her eligibility for services under Section 504 of the Rehabilitation Act and/or the ADA. Documentation must address the specific diagnosis, tests used in making the diagnosis, and test scores, where appropriate. The documentation must indicate that the disability substantially limits at least one major life activity.

The College generally requires documentation from a certified diagnosing professional dated no more than three years prior to the employee/student hire or class start date. The *Employee/Student Release of Information/Verification* form allows the diagnosing professional to send student/employee information supporting his/her disability to the Director of College. In addition, the *Employee/Student Release of Information* and *Disability Information/Verification* forms detail the required information to be included within the documentation. If the student/employee does not have original documentation, or if documentation is older

than three years, a meeting with the Director of College is to be scheduled immediately to discuss the student/employee options.

Documentation received on post-it notes and/or prescription pads are not considered appropriate forms of documentation. Students/employees should refer to the *Employee/Student Release of Information* and the *Disability Information/Verification* form to review the details and areas of information needed to meet the documentation requirements.

If there is a change in the student/employee's condition, or in the original accommodation request, additional documentation may be required to support this request. The student/employee should contact the Director of College immediately to discuss any changes with the condition or to re-negotiate the existing *Employee/Student Accommodation Agreement*. Any amendments to an *Employee/Student Accommodation Agreement* may require the appropriate time to coordinate and may not be implemented immediately.

Step Three: Accommodation Negotiation. Compass Career College is committed to providing equal access to educational programs and employment opportunities for all students and employees in an effort to promote the ability to achieve required program/employment outcomes. Once documentation has been received, the campus Compliance Officer (CO) will act as the disability services advisor. The CO will review the documentation, any recommended accommodation(s) from the diagnosing professional, and the students or employees requested accommodation(s). Reasonable accommodations are offered in accordance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990. The student/employee, the CO, and the Director of College will discuss the requested accommodation(s). The student/employee and the Director of College will discuss the requested accommodation(s) and sign an *Employee/Student Accommodation Agreement*. Once accommodations are granted, the student/employee has the right and the responsibility to exercise the accommodation if they so choose. Each *Employee/Student Accommodation Agreement* is specific to the individual and may be modified by the negotiation process if additional documentation is submitted. Compass Career College is required to provide reasonable accommodations in a prompt and effective manner.

Definition, Determination, and Negotiation of Reasonable Accommodations:

Reasonable accommodations are modifications or adjustments that assure equal access to opportunity and/or access to campus facilities, programs, and activities for persons with disabilities.

Reasonable accommodations are determined on a case-by-case basis. There is not one standard set of accommodations per disability type. Students will engage in an interactive process to identify the precise limitations resulting from the disability and come to an agreement with the Director of College.

Reasonable accommodations are determined based on the disability documentation and the *Employee/Student Self-Disclosure Statement*. The disability documentation should include recommended accommodations from the diagnosing professional. The *Employee/Student Self-Disclosure Statement* will indicate any previously received accommodations, and/or current accommodation(s) requests. The student/employee and Director of College will review these requested accommodation(s). Upon agreement, the student/employee will complete and sign the *Employee/Student Accommodation Agreement*.

Unreasonable accommodation requests include the following:

Any request for accommodation that requires a substantial change in an essential element of Compass Career College's core academic curriculum (may vary according to program of study).

Any request for accommodation that poses an unreasonable financial or administrative burden on the College.

Additional Time Accommodations and Incomplete Grades:

If determined as a necessary accommodation eligible students will be allowed additional time to complete individual assignments and exams. Accommodated students will not be penalized academically for taking the additional time accommodation to complete these course requirements.

If determined as a necessary accommodation, students may contact the faculty member at the beginning of each class to discuss extended due dates. If students feel they may need additional time beyond this standard, he/she should contact the Director of College.

Individual Assignments:

As a general guideline, students will be permitted a minimum of time and a half (1.5x) to complete individual assignments. For example, if all students are required to submit an assignment within two weeks, accommodated students with the additional time accommodation will be granted three weeks to submit the assignment.

Exams:

As a general guideline, students will be permitted a minimum of time and a half (1.5x) to complete class exams. For example, if all students are required to complete an exam in one hour, accommodated students with the additional time accommodation will be granted one and one-half hours to complete the exam.

Step Four: Communication. The faculty member(s) for student course(s) will be notified of the agreed upon accommodation(s) and ensure the accommodation(s) is available. The Director of College will ensure accommodation(s) are available for employee(s). If a change in schedule is warranted, the student/employee must notify the Director of College immediately to advise of the change. If the Director of College is not notified of the schedule or faculty member change, formal

accommodations may not be made. If a student withdraws from Compass Career College and returns at a later date, the student must notify the Director of College upon return to advise of the new start date in order to re-activate his/her formally agreed upon accommodations. Individuals who require assistance during an emergency situation must self-disclose this need to the Director of College. The Director of College will develop a personal emergency plan for the student/employee, even if no formal *Accommodation Agreement* is filed.

Communication Expectations:

Communication is critical in order to provide reasonable accommodation(s) and address concerns in a timely fashion.

Students/employees should immediately contact the Director of College when:

- A change occurs in the course schedule or faculty member
- A change occurs in program (i.e.: Allied Health to Practical Nursing)
- Returning after a withdrawal, leave of absence, or any other non-scheduled break in his/her program. Accommodation(s) will not be automatically re-activated upon return without proper notification to the Director of College.
- A problem occurs with classroom/employment accommodations
- Student/employee has questions regarding the agreed upon accommodation(s)

Student Responsibilities:

Although Section 504 and Title II apply to postsecondary schools, there are different responsibilities you will have as a postsecondary student than you had as a high school student. The Office of Civil Rights strongly encourages students to know their responsibilities and those of postsecondary schools under Section 504 and Title II (see OCR publication *Students with Disabilities Preparing for Postsecondary Education*, web address: <http://www2.ed.gov/about/offices/list/ocr/transition.html>).

Students at Compass Career College are responsible for:

- Acting as their own self-advocate
- Meeting with their instructors and requesting accommodations
- Initiating the use of approved accommodations
 - Due to the risk of violating confidentiality, instructors will not initiate accommodations.
 - It is the student's responsibility to decide when and/or if approved accommodations will be exercised.
- Requesting a review of their accommodation agreement if they feel additional accommodations are needed.

Step Five: Complaints/Grievances.

Purpose: Compass Career College recognizes and accepts its obligations under the Americans with Disabilities Act of 1990, The Rehabilitation Act of 1973, the ADA Amendments Act of 2008, Title IX of the Education Amendments of 1972, and the Age Discrimination Act of 1975 to prohibit discrimination of any kind

against its students and employees to provide a reasonable procedure to submit complaints of discrimination to the appropriate parties.

Policy: It is the policy of Compass Career College that all employees and students be able to enjoy a campus environment free of all forms of discrimination. No employee or student should be subjected to any form of discrimination. It is also the policy of Compass Career College to comply with all federal and state laws regarding discrimination

Procedure: Please consult the grievance procedure set forth for all grievances at Compass Career College.

IV. Forms:

The following forms have been created to assist students and employees seeking reasonable accommodations under Section 504 of the Rehabilitation Act of 1973 and the under the Americans with Disabilities Act of 1990, and the ADA Amendments Act of 2008.