# Palo Alto University

#### **Student Disabilities Services Handbook Disclosure**

This Student Disabilities Services Handbook was prepared to provide information and does not constitute a contract. Palo Alto University (PAU) reserves the right to change, delete, supplement, or otherwise amend at any time and without prior notice the information, requirements, and policies contained in this Student Disabilities Services Handbook. PAU recognizes its obligation to provide program accessibility for persons with disabilities. Contact the Office of Accessible Education at (650) 433-3818 (Voice) to obtain information about the existence and location of services, activities, and facilities that are accessible to persons with disabilities. This Student Disabilities Services Handbook is available in alternate format upon request by persons with disabilities. Palo Alto University is accredited by the Accrediting Commission for Schools, Western Association of Schools and Colleges (ASC WASC), 533 Airport Boulevard, Suite 200, Burlingame, CA 94010-2009, tel: (650) 696-1060, email: mail@ascwasc.org, web: https://www.acswasc.org/. For additional ACS WASC accreditation information, please visit https://www.wscuc.org/institutions/palo-alto-university/.

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# Introduction

Palo Alto University ("PAU" or "the University") is an accredited institution of higher education that is dedicated to education with an emphasis in the behavioral and social sciences; to promoting future innovators and leaders for the benefit of society; to generating knowledge through research and scholarship of the highest level; and to providing services to the community informed by science and scholarship.

The University is committed to providing access for qualified students to all academic programs.

The policies contained in this Student Disabilities Services Handbook serve as the guidelines under which the University's Office of Accessible Education delivers services and reasonable accommodations to students with disabilities to the extent required by law. This policy applies to all eligible students who seek access to facilities, student programs, activities, and services.

Students with disabilities who are interested in attending PAU must complete the regular admission process prior to admission and enrollment at PAU. Applicants for admission with disabilities who seek disability accommodations to complete the process should contact the Office of Accessible Education.

To be eligible to continue at PAU, students with disabilities (like all students) must meet the qualifications and requirements expected generally and must be able to perform the essential elements of the program in which they are enrolled, either with or without reasonable accommodations.

# **Commitment to Diversity and Non-Discrimination**

PAU does not discriminate in its educational programs or services on the basis of race, color, religion, religious creed, ancestry, national origin, age (except for minors), sex, marital status, citizenship status, military service status, sexual orientation, medical condition (cancer-related or genetic-related), disability, gender identity, and any other status protected by law.

PAU complies with Section 504 of the Rehabilitation Act of 1973 and with the Americans with Disabilities Act of 1990 (ADA). The University provides reasonable accommodations to qualified individuals with disabilities to the extent required by law.

# **PAU's Office of Accessible Education**

PAU's **Office of Accessible Education ("OAE")** is the office at the University where students who self-identify themselves as having any disability may direct inquiries for disability services and accommodations.

OAE functions to determine eligibility for student disability services and reasonable accommodations that will provide students with the opportunity for full access and participation in the academic environment.

For more information, contact:

Sharyn E. Moore,

Accessibility Specialist
Palo Alto University
1791 Arastradero Rd., Building 3 (Rm 308)
Palo Alto, CA 94304
oae@paloaltou.edu
(650) 433-3818

Persons with questions regarding accessible educational services should contact the Office of Accessible Education by emailing <a href="mailto:oae@paloaltou.edu">oae@paloaltou.edu</a>.

# **Intake and Registration**

Students with disabilities who wish to request academic adjustments, auxiliary aids, or other types of accommodations, must complete the intake and registration process which includes: completing a registration form (either online or in person) and presenting appropriate, current documentation to support the student's status as a qualified individual with a disability and the need(s) for accommodation.

During the intake and registration process, students will be asked to participate in a student meeting with the OAE staff (either in person or by Zoom) to enable the OAE staff to make an individual assessment for services based upon the student's expressed needs, the documentation presented, and the requirements under the law. This is an interactive process, between the student and PAU, that begins with the first point of contact between the student and the OAE. The OAE staff makes the final determination on eligibility for services and any reasonable accommodations that PAU may offer to the student.

**Recap: To Register with the Office of Accessible Education:** 

#### 1. For current students:

Submit a completed copy of the PAU Office of Accessible Education Request for Disability Accommodations by Student Form by logging into MyPAU Portal.

Forms are available online at: https://my.paloaltou.edu/ICS/Student/

#### OR

Students may request forms by emailing oae@paloaltou.edu.

# 2. Provide current documentation from a qualified professional that identifies the disability(ies) or impairment(s) that limit(s) a major life activity

Students requesting disability services must provide appropriate documentation of the disability(ies) inclusive of the element of having functional impairment(s) that limit(s) the carrying out of one or more major life activities. Please see below for more information on what constitutes appropriate documentation.

Please be sure to keep the original copy of your documentation of disability status for your own records.

#### 3. Meet with the OAE Staff for the Interactive Process

Students will also participate in a student meeting with the OAE staff (either in person or by zoom or by phone) to enable the OAE staff to make an individual assessment for services based upon the student's expressed needs, the documentation presented, and the requirements under the law. It is important for students to be able to discuss the impact of their disability on their academic pursuits. In special circumstances, students who are initiating the accommodations request process may request to include a non-participatory advocate in the interactive discussion meeting. In order for the advocate to attend, as a non-participatory presence, the student must complete an Advocate Consent Form prior to attending the interactive meeting with the representative from the Office of Accessible Education. Please send a message to OAE@paloaltou.edu in order to request an Advocate Consent Form.

# **Documentation of a Disability**

In order to register and become eligible for accommodations, students must timely provide appropriate documentation of the student's disability(ies) to OAE.

Documentation must be recent enough to demonstrate the current status of a person with disabilities and/or need for and/or nature of requested reasonable accommodations. If documentation is more than three (3) years old, students may be asked to submit more current documentation.

Documentation must be prepared and signed by a professional, who in the judgment of PAU, is qualified to diagnose and treat the individual for the disability, such as a licensed physician, psychologist, psychiatrist, neurologist, or learning disability specialist.

Documentation must describe any and all functional limitation(s) of the student and must also state specifically how, if at all, the disability and/or related medications or treatments limit or will limit current participation in courses, programs, services, or activities at PAU and what reasonable accommodations will enable equal access.

The cost of obtaining this documentation is the responsibility of the student. Students must submit the documentation to PAU in a timely manner in order to allow adequate time for processing the requests. What is considered in a "timely manner" will depend on the students' program of study and will be determined by PAU on a case-by-case basis.

New students are encouraged to complete the intake and registration process after admission, but prior to their acceptance of admission.

New students and returning students are required to do so at least 4 weeks *before their program* of study begins so that assessment can be thorough and any accommodations that are to be provided may be implemented at the start of the program of study. If the documentation is incomplete or inadequate to support a requested accommodation in the judgment of PAU, additional documentation may be requested by PAU.

## **Reasonable Accommodation and Services**

Requests for accommodations are considered by PAU on an individual, case-by-case basis. It is the student's responsibility to submit all requests for disability-based accommodations each academic term and in a timely manner.

Reasonable accommodations are determined by PAU upon review of the documentation submitted and through an interactive process with the student. PAU will implement reasonable and effective accommodations where appropriate and in compliance with the law. Requests for accommodations that are determined to be not necessary or effective for the impairment (including when not supported by appropriate documentation), that fundamentally alter the essential elements of programs of PAU, or that would cause an undue hardship to the University, are denied.

Accommodations and services are considered classroom supplements. They are not intended to replace regular course requirements, required course attendance, and accommodations are not a guarantee of a certain grade or success in a particular class. Rather, they are for the purpose of providing equal access to education for students with disability status. Students with disability status are expected to fulfill all academic and course requirements and evaluation standards, as expected of all PAU students.

Accommodations are not provided retroactively. OAE will not provide accommodations for academic work that is completed before a student registered and became eligible for student disability services/reasonable accommodations.

Possible forms of accommodations that may be available if necessary and effective for the particular impairment include:

- Extended time for exams and quizzes
- Notetaking services

[Note: In circumstances in which submitted documentation and the judgement of OAE staff supports the use of a student notetaker, the individual who provides this service may not be a student who is enrolled in the same Academic Degree Program.]

- Auxiliary aids or services
- Alternative media formats
- Electronic format texts

[Note: the majority of published texts are widely available in electronic format; in such circumstances, it is the responsibility of the student to purchase the text directly from the publisher.]

- Tutorial services
- Recorded/audiobooks
- Allowance of service animals on campus
- Extended time on papers and projects (typically not given on an ongoing basis, but rather as situations arise, e.g., students with acute medical or psychological episodes)
- Allowance of adaptive equipment and assistive device

# **Confidentiality of Records**

Student disability files, including documentation provided by students and medical providers, are handled with great care in order to protect your personal information and prevent inappropriate disclosures of information.

The OAE files are not part of the student's educational record as defined by the Family Educational Rights and Privacy Act ("FERPA"). Information about a student's disability is not shared with others without the student's written consent, except on a need-to-know basis and/or in order for the University to implement the approved accommodations.

If an accommodation has been approved by OAE, OAE will send accommodation letters to student-specified professors or instructors that include a list of approved classroom or other academic accommodations, with a copy to the student. The nature or name of the disability(ies) will not be disclosed. The letter will only indicate the specific accommodations that have been approved and that are to be implemented for student success. The existence or nature of approved accommodations is not confidential.

# **Service Animal or Assistance Animal Policy**

The following information is provided to help define the role and the place of animals at PAU in promoting the safety, dignity, and independence of persons with disabilities. Service animals for use at non-PAU controlled places must be requested of the entity controlling the place in question.

#### 1. Service Animals are:

"...any . . . animal individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals who are hearing impaired to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items."

A service animal is one which is specifically trained to perform tasks that are related to the disability of the person. A service animal does not need to be licensed or certified by a state or local government or a training program. Service animals whose behavior poses a direct threat to the health or safety of others or is disruptive to the campus community may be excluded.

Most service animals working are dogs, such as a guide dog that serves as a travel tool for persons with severe visual impairments or who are blind; hearing dog who has been trained to alert a person with significant hearing loss or who is deaf when a sound occurs; service/support dog that has been trained to assist a person who has a mobility or health impairment with carrying, fetching, opening doors, ringing doorbells, activating elevator buttons, steadying a person while walking, helping a person up after the person falls, etc.; SSigDog is a dog trained to assist a person with autism (the dog alerts the partner to distracting repetitive movements common among those with autism); and seizure response dog is a dog trained to assist a person with a seizure disorder (the dog may stand guard over the person during a seizure, or the dog may go for help).

### 2. Approval Authority

Students who wish to utilize a service animal must register with OAE and make a request to seek approval from OAE. Service animals for use at non-PAU controlled places must be requested of the entity controlling the place in question.

### 3. Responsibilities for Persons with Disabilities wishing to use Service Animals

The service animal's partner is at all times solely responsible for the cost of care, arrangements and responsibilities for the well-being of a service animal as well as any property damage. Service animals on campus must meet requirements for the presence of animals in public places (vaccinations, licensure, ID tags, etc.) mandated by state or local ordinance must be followed. The animal must be in good health. The person with a disability must be in full control of the animal at all times. Reasonable behavior is required from service animals while on campus. The partner must follow local ordinances in cleaning up after the animal defecates. The partner of an animal that is unruly or disruptive (e.g., barking, running around, bringing attention to itself) may be asked to remove the animal from facilities. Animals must have an annual clean bill of health from a licensed veterinarian. Service animals who are ill should not be taken into public areas. Partners with animals that are unclean, malodorous and/or bedraggled may be asked to leave facilities.

#### 4. Areas off Limits to Service Animals

Mechanical rooms, such as boiler rooms, facility equipment rooms, electric closets, elevator control rooms and custodial closets, are off-limits to service animals. Any room where protective clothing is worn is off-limits to service animals. Any room, including a classroom,

where there are sharp metal cuttings or other sharp objects on the floor or protruding from a surface; where there is hot material on the floor (e.g., molten metal or glass); where there is a high level of dust; or where there is moving machinery is off-limits to service animals. If a student, faculty, or staff member has an off-campus internship, or other PAU-related activity, then the student must abide by the service animal policy at the off-campus entity. Students are encouraged to inform the OAE before bringing service animals to off-campus internships, or other PAU-related activities that are off-campus so that arrangements and approval from the off-campus site can be acquired.

#### 5. "Emotional Support" Animals

"Emotional support" animals do not qualify as service animals because they are not trained to do specific tasks that help the person deal with the disability. Emotional support animals are for persons' residences and because PAU does not have residential housing, emotional support animals are not permitted on PAU's campus, in PAU's classrooms, or in other areas of the PAU campus. Individuals who utilize emotional support animals are encouraged to discuss the role that this animal has in supporting their disability when engaging in the interactive intake process with OAE staff. Students are encouraged to inform the OAE before bringing emotional support animals to off-campus internships, or other PAU-related activities that are off campus so that any necessary arrangements or considerations by an off-campus site may be addressed.

Animals that are not trained to be service animals, or that have been prescribed solely to fulfill an emotional support role, are pets. Pets are not permitted on PAU's campus, in PAU's classrooms, or at other PAU-related activities.

#### 6. Grievances

Any student dissatisfied with a decision made concerning a service animal should follow the applicable Dispute Resolution Procedures. Students should contact OAE. Staff and faculty members should refer to the appropriate handbook. The grievance process will be the process that allows for review and decision by persons not in the Office of Accessible Education.

# **Dispute Resolution Process**

Students who are dissatisfied with decisions made regarding a student's eligibility for OAE services or the reasonable accommodations that are offered by PAU, may resolve the matter by speaking with OAE staff. If the student is still dissatisfied, the student may submit a written complaint using the grievance procedures as outlined in the PAU Student Handbook.