

Pacifica Graduate Institute's Policy for Accommodating Students and Applicants with Disabilities

It is the policy of Pacifica Graduate Institute to comply with the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and state and local regulations regarding students and applicants with disabilities. Under these laws, no qualified individual with a disability shall unlawfully be denied access to or participation in services, programs, or activities of Pacifica Graduate Institute.

In carrying out this policy, we recognize that disabilities include mobility, sensory, health, psychological, and learning disabilities. Pacifica will make efforts to provide reasonable accommodations to qualified individuals with disabilities, to the extent that such accommodations are readily achievable. Though Pacifica takes the needs of students with disabilities seriously, it is not able to guarantee that all services requested can or will be provided. Specifically, accommodations that are unduly burdensome or that fundamentally alter the nature of the service, program or activity may not be entertained.

Disability Defined

A disability is a physical or mental impairment that substantially limits one or more of the major life activities of the individual.

Major Life Activities

The phrase major life activities refers to normal functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

Physical Impairment

A physical impairment includes any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory and speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

Mental Impairment

A mental impairment includes any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Learning Disabilities

A learning disability is a generic term that refers to a heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning, or mathematical abilities. These disorders occur in persons of average to very superior intelligence and are presumed to be due to central nervous system dysfunction.

Admission of Students with Disabilities

Pacifica will make admission decisions using criteria which do not consider an individual's disability. Thus, Pacifica will not impose or apply admission or eligibility criteria that screen out or tend to screen out individuals on the basis of their disability, unless such criteria is

necessary to keep the program, service or activity being offered from being overburdened or fundamentally altered.

Students with disabilities desiring to enroll in any program, service or activity of Pacifica must be able to meet the minimal standards of Pacifica and the particular program, service or activity to which admission is sought.

Students Requesting Accommodations

Students with disabilities who require accommodations must make those needs known to the Academic Affairs Associate as soon as possible. It is the student's responsibility to make his/her needs known in a timely manner and to provide the appropriate documentation (see Disability Verification section and Guidelines for Documentation sections). The student should not assume that this information is known by Pacifica because it was included in the student's application for admission or communicated to anyone other than the Academic Affairs Associate

Pacifica will make reasonable accommodations to students with documented disabilities. These accommodations may include courseload modifications, exam accommodations, readers, sign language interpreters, note takers, and additional time to complete assignments. No accommodation will be provided if it fundamentally alters the nature of the service, program or activity or if it would be unduly burdensome whether financially, administratively, or otherwise.

Students seeking accommodations should contact the Academic Affairs Associate for an accommodations request packet. Once the request form and appropriate documentation is received, the Academic Affairs Associate will contact the student to develop a suitable accommodation plan.

Note: Temporary impairments are not commonly regarded as disabilities, and only in rare circumstances will the degree of limitation rendered by a temporary impairment be substantial enough to qualify as a disability pursuant to this policy.

Accommodations

Pacifica will provide services and accommodations as mandated by the ADA and section 504 of the Rehabilitation Act of 1973. Because each disability and the particular circumstances surrounding each request are unique, it is impossible to predict what accommodations might be provided to any particular student. Academic accommodations include, but are not limited to: note takers, testing accommodations, extended time on exams, American Sign Language interpreters, and audio recordings. This list is not exhaustive, nor are these services guaranteed.

Whether a requested accommodation will be provided will depend on the nature and functional limitations of the student's disability, the particular class or classes taken, and the burden that the accommodation would place on Pacifica in terms of resources as well and whether the accommodation would fundamentally disturb or alter the nature of the service provided.

Disability Verification

Students requesting accommodations must provide diagnostic documentation from a licensed clinical professional who is familiar with the functional implications of the impairments. The opinions and recommendations of the licensed clinical professional will be considered in developing a suitable accommodation plan. Disability documentation must adequately verify the nature and extent of the disability in accordance with current professional standards and techniques, and it must clearly substantiate the need for all of the student's specific accommodation requests. All documentation must be submitted on the official letterhead of the professional describing the disability. The report should be dated and signed and include the name, title, and professional credentials of the evaluator, including information about license or certification.

If the original documentation is incomplete or inadequate to determine the extent of the disability or reasonable accommodations, Pacifica has the discretion to require additional documentation. Any cost incurred in obtaining additional documentation when the original records are inadequate is borne by the student. If the documentation is complete but Pacifica desires an additional assessment for the purpose of obtaining a second opinion, then Pacifica bears the latter costs.

In general, it is not acceptable for such documentation to include a diagnosis or testing performed by a member of the student's family. Additionally, students requesting accommodations for the manifestations of multiple disabilities must provide evidence of all such conditions.

Guidelines for Documentation of a Disability

Accommodations will be reviewed, and if appropriate, granted once all documents have been received by the Academic Affairs Associate. Please note that prior history of a certain accommodation does not guarantee its continued provision. An Individualized Education Plan (IEP) or a 504 Plan is not sufficient documentation of a disability.

To establish that an individual is covered under Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973, documentation must indicate that the disability substantially limits a major life activity. If academic or classroom-based adjustments and accommodations are requested learning must be one of the major life activities affected.

Documentation submitted must meet the following criteria:

- Be appropriate to verify eligibility
- Demonstrate a current substantial impact of one or more major life activities
- Support the request for accommodations, academic adjustments, and/or auxiliary aids

Note: All diagnosticians must be impartial individuals who are not family members of the student. Documentation must be supplied by a qualified professional who is licensed or certified to diagnose the disability in question. Diagnostic reports must include the names, titles, professional credentials, addresses, and phone numbers of the evaluators as well as the date(s) of testing.

Documentation for eligibility should be current, within the last three years. Exceptions to this policy can be made by the Academic Affairs Associate, but such exception is not mandated and lies within the discretion of the Academic Affairs Associate.

Documentation Guidelines for Physical Disabilities and/or Systemic Illnesses

Physical disabilities and systemic illnesses include but are not limited to: Mobility Impairments, Multiple Sclerosis, Cerebral Palsy, Chemical Sensitivities, Spinal Cord Injuries, Cancer, AIDS, Muscular Dystrophy, and Spinal Bifida. Any physical disability and/or systemic illness is considered to be in the medical domain and requires the expertise of a licensed physician, including a neurologist, psychiatrist, or other medical specialist with experience and expertise in the area for which accommodations are being requested.

Documentation must include:

- A clear statement identifying the disabling condition(s).
- An assessment of the functional limitations of the condition(s) for which accommodations are being requested, and whether the degree of limitation is mild, moderate, or substantial. This assessment must include a summary of the procedures and evaluation instruments used to make the diagnosis, including evaluation results and standardized scores if applicable.
- A description of present symptoms that meet the criteria for diagnosis.
- Medical information relating to the student's needs to include the impact of medication on the student's ability to meet the demands of the postsecondary environment.
- Suggestions of reasonable accommodations that might be appropriate at the postsecondary level are encouraged. These recommendations should be supported by the diagnosis.

Documentation Guidelines for Deafness or Hearing Loss

Services are provided to all deaf and hearing impaired students at Pacifica who have a documented unaided bilateral hearing loss of at least 30 db. The audiologist who conducts this test must be an impartial individual who is not related to the student.

Documentation must include:

- A clear statement identifying the disabling condition.
- An audiological evaluation and/or audiogram
- An assessment of the functional limitations of the hearing loss for which accommodations is being requested, and whether the degree of limitation is mild, moderate, or substantial.
- Suggestions as to how the functionally limiting manifestations of the hearing loss condition(s) may appropriately be accommodated. These recommendations should be supported by the diagnosis.

Documentation Guidelines for Low Vision or Blindness

Ophthalmologists are the primary professionals involved in diagnosis and medical treatment of individuals who are blind or experience low vision. Optometrists provide information regarding the measurement of visual acuity as well as tracking and fusion difficulties (including but not limited to: eye focusing problems, visual sensory disorders, and motor integration).

Documentation must include:

- A clear statement identifying the disabling condition.
- An ocular assessment or evaluation from an ophthalmologist.
- A low-vision evaluation of residual visual function, when appropriate.
- An assessment of the functional limitations of the condition(s) for which accommodations is being requested, and whether the degree of limitation is mild, moderate, or substantial.
- Suggestions as to how the functionally limiting manifestations of the visual condition(s) may be appropriately accommodated. These recommendations should be supported by the diagnosis.

Documentation Guidelines for a Specific Learning Disability

Students requesting accommodation on the basis of a specific learning disability must provide documentation from a professional who has undergone comprehensive training and has relevant experience in differential diagnosis of a full range of cognitive and psychiatric disabilities. The following professionals are considered qualified: licensed clinical psychologists, neuropsychologists, LD specialists, and educational therapists.

The diagnosis of a learning disability shall be based on multiple forms of evidence that support a learning disability diagnosis.

Documentation must include:

- A diagnostic interview including a description of the presenting problem(s); developmental, medical, psycho-social and employment histories; and family history (including primary language of the home).
- Assessment – for the neurological or psychological evaluation to illustrate a substantial limitation to learning, the comprehensive assessment battery must contain the following domains:
 - Aptitude/Cognitive Ability – an assessment of global intellectual functioning as measured by the Wechsler Adult Intelligence Scale-III (WAIS-III) with all subtests and standard scores.
 - Academic Achievement – A comprehensive achievement battery (e.g., Woodcock-Johnson Psycho educational Battery – Revised: Tests of Achievement) with subtest and standard scores, indicating current level of functioning in the academic areas of reading, math, oral and written language.
 - Information Processing – A comprehensive battery (e.g. Woodcock-Johnson Psycho educational Battery – Revised: Tests of Cognitive Abilities) with subtest and standard scores which addresses the specific areas of short and long-term memory, sequential memory, auditory and visual perception, processing speed, executive functioning, and motor ability.
- A specific diagnosis which conforms to DSM-IV criteria for a specific learning disability.
- A clinical summary which indicates the following:

- The substantial limitations to major life activities posed by the specified learning disability;
- The extent to which these limitations impact the academic context for which accommodations are being requested;
- How the specific effects of the learning disability may be accommodated at the postsecondary level.

Since accommodations are based on the current impact of the learning disability to the student, the documentation and testing must be no more than three years old.

Documentation Guidelines for Attention Deficit Hyperactivity Disorder (ADHD)

Students requesting accommodations on the basis of attention deficit-hyperactivity disorder (ADHD) must provide documentation by a professional who has undergone comprehensive training and has relevant experience in differential diagnosis and the full range of psychiatric disorders (licensed clinical psychologist, neuropsychologist, psychiatrist and other relevantly trained medical doctors).

Documentation must include:

- Evidence of early impairment. The condition must have been exhibited in childhood in more than one setting.
- Evidence of current impairment. An assessment of the individual's presenting attentional symptoms and evidence of current impulsive/hyperactive or inattentive behaviors that significantly impair functioning in two or more settings must be provided. In an academic setting, functional impairment is most often expressed in poor academic performance across a variety of academic tasks.
- A diagnostic interview. The interview must contain self-report and third party information pertaining to: developmental history, family history, learning or psychological difficulties; relevant medical and medication history; a thorough academic history; a review of prior psycho educational test reports to determine whether a pattern of strengths or weaknesses is supportive of attention or learning problems.
- Evidence of alternative diagnoses or explanations being ruled out. The documentation must investigate and discuss the possibility of dual diagnoses and alternative or coexisting mood, behavioral, neurological, and/or personality disorders that may confound the ADHD diagnosis.
- Neuropsychological or psycho educational assessments needed to determine the current impact of the disorder on the individual's ability to function in an academic setting and to establish eligibility for classroom accommodations including alternative testing, note takers, and/or alternative media. Such data should include subtest and standard scores.
- A specific psychological diagnosis as per the Diagnostic and Statistical Manual – IV (DSM-IV). Symptoms of hyperactivity/impulsivity that were present in childhood, and the current symptoms which have been present for at least the past six months and which impair functioning in two or more settings (e.g., school, work, home) must also be identified.
- An indication of whether or not the student was evaluated while on medication and the degree to which the prescribed treatment reduces the level or degree of impairment.

- A clinical summary which indicates: the substantial limitations to major life activities posed by the disability; describes the extent to which these limitations would impact the academic context for which accommodations are being requested; suggests how the specific effects if the disability may be accommodated; and states how the effects of ADHD are mediated by the recommended accommodations.

Documentation Guidelines for Traumatic Brain Injury

Traumatic Brain Injury is trauma to the brain resulting from cerebral vascular accidents, tumors, or other medical conditions. Students requesting accommodations on the basis of traumatic brain injury (TBI) or brain insult must provide documentation by a neuropsychologist.

Documentation must include:

- A thorough neuropsychological evaluation including assessment of the areas of attention, visuoperception/visual reasoning, language, academic skills, memory/learning, executive function, sensory, motor, and emotional status. Data should include subtest scores and percentiles.
- Evidence of current impairment. A history of individual's presenting symptoms and evidence of behaviors that significantly impair functioning.
- A diagnostic interview. The interview must contain self-report and third-party information pertaining to: developmental history, family history, learning or psychological difficulties, relevant medical history, and a thorough academic history.
- Evidence of alternative diagnoses or explanations being ruled out. The documentation must investigate and discuss the possibility of dual diagnoses and alternative or coexisting mood, learning, behavioral, and/or personality disorders that may confound the diagnosis.
- A specific psychological diagnosis as per the Diagnostic and Statistical Manual – IV (DSM-IV).
- A clinical summary which: indicates the substantial limitations to major life activities posed by the disability; describes the extent to which these limitations would impact the academic context for which accommodations are being requested; suggests how the specific effects of the disability may be accommodated; and states how the effects of the disability are mediated by the recommended accommodations.
- Suggestions of reasonable accommodations that might be appropriate at the postsecondary level. These recommendations must be supported by the diagnosis.

Documentation Guidelines for Psychiatric/Psychological Disabilities

Psychiatric and psychological disabilities include but are not limited to: Depressive Disorders, Post-Traumatic Stress Disorder, Bipolar Disorders, and Dissociative Disorders. Students requesting accommodations on the basis of a psychiatric disability must provide the current documentation from a licensed psychologist, psychiatrist, or licensed clinical social worker.

Documentation must include:

- A specific, current psychiatric diagnosis as per the DSM-IV which indicates the nature, frequency, and severity of the symptoms upon which the diagnosis was

predicated. A diagnosis without an explicit listing of current symptoms is not sufficient. Primary and secondary Axis I and Axis II diagnoses are required.

- Evidence of current impairment. An assessment of the individual's presenting symptoms and evidence of current behaviors that significantly impair functioning must be provided. In an academic setting, functional impairment is most often expressed in poor academic performance across a variety of academic tasks.
- Evidence is needed to determine the current impact of the disorder on the individual's ability to function in an academic setting and to establish eligibility for classroom accommodations including alternative testing, note takers and/or alternative media.
- Prescribed medications, dosages and schedules which may influence the types of accommodations provided.
- A clinical summary which: indicates the substantial limitations to major life activities posed by the psychiatric disability; describes the extent to which these limitations would impact the academic context for which accommodations are being requested; suggests how the specific effects of the psychiatric disability may be accommodated; and states how the effects of the psychiatric disability are mediated by the recommended accommodations.

Forms

Students requesting accommodations must submit an Accommodations Request Form at the beginning of each academic year. Students must submit the request form at least 30 days prior to the first day of classes. Confirmation must be sent quarterly either via e-mail or snail mail that the accommodation request(s) needs to be continued.

Note: It is the student's responsibility to identify as an individual with a disability when an accommodation is needed; complete and submit all documentation in a timely fashion; and follow published procedures for obtaining reasonable accommodations, academic adjustments and/or auxiliary aids and services.

Grievance Process for Students with Disabilities

The purpose of this process is to assure prompt and equitable resolutions with issues arising from a student's belief that their requests for disability accommodations have been improperly denied, or who believes they may have been discriminated against on the basis of their disability. This process is designed to secure resolution through mutual agreement and is responsive to students concerns while providing due process rights for all participants within the disputed issue.

Informal Process

In an effort to remediate a grievance through an informal process, if a student feels they have been unreasonably denied access or accommodations, it is preferred that they address their concerns with the faculty or staff member (s) who is (are) directly involved in the issue. Students are also encouraged to contact the Academic Affairs Associate who may be able to initiate discussions to explore alternative solutions to the requests. In addition, students may

pursue informal remediation through contact with the Department Chair or the Department Director or Supervisor.

Formal Process

If the informal grievance process does not result in the successful remediation of the issue, the student may initiate a formal grievance by submitting the grievance in writing on the Pacifica Graduate Institute's Students with Disabilities Grievance Form. The grievance should be filed with the Academic Affairs Associate within 30 days of the alleged violation or perceived discrimination.

The grievance will be reviewed, additional information will be gathered from all parties, and the appropriate supervisors will be consulted. In most cases, a written decision and/or resolution will be rendered within ten days of receipt of the formal complaint and in no circumstance will the timeline extend beyond 30 days. In addition, if it is found that discrimination based upon disability was evident or accommodations were improperly denied, measures will be enacted to prevent future incidents.

Appeal Process

If the decision or recommended resolution is not acceptable, the student may file an appeal to the Chief Academic Officer within 21 days of the recommendation being mailed to the grievant. A written request for appeal should include a summary of the grievance as well as copies of the documents provided throughout the informal and formal grievance process. The Chief Academic Officer, in conjunction with the Chief Operations Officer will review the grievance, investigate further, and issue a written decision and/or resolution within 21 days of receipt of the grievance. The decision of the Chief Academic Officer will be final.

If the matter involves the Chief Academic Officer or the Chief Operations Officer, the grievance may be brought to the attention of the Office of the President. The President will review the grievance, investigate further, and issue a written decision and/or resolution within 21 days of receipt of the grievance. The decision of the President will be final.

If it is found that discrimination based upon disability was evident or accommodations were improperly denied, measures will be enacted to prevent future incidents.

Frequently Asked Questions

What constitutes a disability?

A disability is defined as a mental or physical impairment which substantially limits one or more major life activities.

What does substantially limiting mean?

According to Section 504 of the Rehabilitation Act of 1973, substantially limiting is defined as being unable to perform a major life activity, or significantly restricted as to the condition,

manner, or duration under which a major life activity can be performed, in comparison to the average person or to most people.

I've been accepted at Pacifica Graduate Institute and I have a disability...what do I have to do to receive accommodations?

Students with disabilities who need accommodations must contact the Academic Affairs Associate to request an ADA Accommodations Packet. Students should not assume that the Academic Affairs Associate knows any information about their disability because it was included in the application for admission process.

Is my temporary impairment considered a disability?

A temporary impairment (e.g., broken arm or leg, recovering from surgery, et.) does not constitute a disability for purposes of Section 504 or the ADA unless its severity is such that it results in a substantial limitation of one or more major life activities for an extended period of time. The issue of whether a temporary impairment is substantial enough to be a disability must be resolved on a case-by-case basis, taking into consideration both the duration of the impairment and the extent to which it actually limits a major life activity of the affected individual.

How can I obtain permission for accessible (handicapped) parking?

If a student requests parking at the Lambert Road Campus because of physical disability, he/she must submit to the Campus Receptionist a doctor's verification of the disability or possess a valid placard issued by the DMV, which must be properly displayed within the vehicle. If a student has special needs that require a family member or caretaker's presence on campus for an extended period of time, he/she must make arrangements for the parking prior to coming to the Lambert campus.

Student parking is available at the Ladera Lane campus. Handicapped parking is available with the above criteria.

Are there any sources of funding for college expenses that are specifically for students with disabilities?

- ❖ Vocational Rehabilitation Services: A federal program designed to "obtain, maintain, and improve employment for people with disabilities". To be eligible for funding, a student must have a disability which is severe enough that it impedes them from getting or keeping a job specifically because of the disability. It must also be agreed that college is needed to increase a student's ability to obtain employment.
- ❖ Financial Aid/Scholarship Opportunities: Funding opportunities for students can be found at: <http://www.finaid.org/otheraid/disabled.phtml>

This policy was adopted from Title III of the Americans with Disabilities Act; The National Joint Committee on Learning Disabilities, Journal of Learning Disabilities; The University of Houston Law Center Handbook for Students and Applicants With Disabilities; The University of Wisconsin, Madison McBurney Disability Resource Center; University of Illinois at Urbana-Champaign Division of Rehabilitation-Education Services; The consortium on ADHD Documentation, Educational Testing Services Document titled "Guidelines for Documentation of Psychiatric Disabilities in Adolescents and Adults.