



## **NORTHWEST COLLEGE HOUSING REASONABLE ACCOMMODATION PROCEDURE**

### **I. INTRODUCTION AND BACKGROUND**

Northwest College ("NWC" or the "College") recognizes the importance of providing reasonable accommodations in its housing procedures and practices where necessary for individuals with disabilities to use and access College housing. These procedures explain the specific requirements and guidelines which govern requests for reasonable accommodation in College housing. NWC reserves the right to amend these procedures at any time as circumstances require.

### **II. PROCEDURE FOR REQUESTING REASONABLE ACCOMMODATION (EXCLUDING REQUESTS FOR SERVICE ANIMALS UNDER THE AMERICANS WITH DISABILITIES ACT AMENDMENTS ACT)**

The Disability Support Services Office is responsible for evaluating whether to grant or deny requests for reasonable accommodation in College housing. In evaluating the request, Disability Services will consult with the Office of Residence Life ("Residence Life"), the Vice-President of Student Services, and the NWC Student Success Center, as necessary, to determine whether the requested accommodation is necessary and reasonable. Individuals with a disability who reside or intend to reside in College housing who believe they need a reasonable accommodation must contact Disability Services.

Requests for reasonable accommodation in College housing policies and practices are governed by the following requirements:

#### **1) Requesting a Housing Accommodation**

- a. An individual with a disability must complete the "Disability Accommodation Request Form for College Housing" (the "Request Form") either online or in person to request a reasonable accommodation. Copies of the Request Form are available from Disability Services. If the individual requires assistance in completing the Request Form because of his/her disability, Disability Services will provide assistance in completing the form.
- b. The individual making the request for accommodation should complete and provide the Request Form to Disability Services as soon as practicably possible before moving into College housing. If the request for accommodation is made fewer than sixty (60) days before the individual intends to move into College housing, NWC cannot guarantee that it will be able to meet the individual's accommodation needs during the first semester or term of occupancy.
- c. If the need for the accommodation arises when an individual already resides in College housing, he/she should contact Disability Services and complete the Request Form as soon as practicably possible. NWC cannot guarantee that it will be able to meet the accommodation needs during the semester or term in which the request is received.

- d. Absent exceptional circumstances, the College will attempt to provide a written response to a reasonable accommodation request within fourteen (14) business days of receiving the information described in paragraph 2 below.

## **2) Information that May Be Requested for Housing-Related Reasonable Accommodation Requests**

Disability Services shall limit its requests for information to only the information necessary to verify whether the individual making the request has a disability and/or to evaluate if the reasonable accommodation is necessary to provide the individual an equal opportunity to use and access College housing.

- a. **Readily Apparent Disability/Necessity:** If the individual's disability and the necessity for the accommodation are readily apparent (e.g. an individual with a physical disability using a wheelchair needs an accessible room), the individual need only explain what type of accommodation he/she is requesting. No individual documentation or verification of disability and/or necessity is required under these circumstances.
- b. **Non-Readily Apparent Disability/Necessity:** If the disability is readily apparent but the need for the accommodation is not apparent, the College may ask for additional information to verify the request.
  - i. In the case of housing accommodations (not animal related) the College may require the "Disability Documentation for College Housing" form filled out by the student's Physician or Mental Health provider.
  - ii. In the case of a request of an assistance animal as an accommodation in college housing the College may require the individual and a reliable third party to complete the "Reasonable Accommodation Verification Form for Assistance Animals in College Housing". A reliable third party is someone who is familiar with the individual's disability and the necessity for the requested accommodation. A reliable third-party includes, but is not limited to, a doctor or other medical professional, a peer support group, or a non-medical service agency (e.g., National Association of the Deaf).
- c. Absent exceptional circumstances, within seven (7) business days of receiving the completed Verification Form or Documentation Form from the third-party, the Coordinator of Disability Services, after consultation with the Vice President of Student Services and Residential Life Director, will determine if the accommodation is necessary because of a disability to provide the individual an equal opportunity to use and access College housing.
  - i. If the third party returns the Verification Form or Documentation Form without sufficient information for Disability Services to determine whether an accommodation is necessary, the Coordinator of Disability Services will inform the individual in writing of the insufficiency and may request additional information, including speaking directly with the individual supplying the information, within seven (7) business days of receiving the verifying document.

- ii. The individual making the request for accommodation must cooperate with Disability Services in a timely manner in providing all information needed to determine whether the requested accommodation is necessary.

### **3) Determination of Reasonableness**

- a. Disability Services shall consult with Residence Life to determine if implementing the requested accommodation is reasonable and may deny the requested accommodation if it is unreasonable.
- b. An accommodation is unreasonable if it: (1) imposes an undue financial and/or administrative burden; (2) fundamentally alters College housing policies; (3) poses a direct threat to the health and safety of others or would cause substantial property damage to the property of others, including College property; and/or (4) is otherwise unreasonable to the operation of the College.

### **4) Approval of Accommodation**

- a. If Disability Services determines a requested accommodation is necessary and is not unreasonable, it will contact the individual, in writing, within seven (7) business days of its determination, to arrange a meeting to discuss the implementation of the accommodation.

### **5) Emergency Evacuation**

Students who require personal assistance in an emergency evacuation are urged to identify themselves directly to the Campus Security Coordinator. The College is not responsible for Emergency Evacuation of Assistance Animals.

### **6) Denial of Accommodation/Appeal**

- a. If Disability Services determines a requested accommodation is necessary but unreasonable, Disability Services will contact the individual, in writing, within seven (7) business days of its determination and engage in an interactive process with the individual to determine if there are alternative accommodations that might effectively meet the individual's disability-related needs.
- b. If the individual is unwilling to accept any alternative accommodation offered by Disability Services or there are no alternative accommodations available, Disability Services will provide a verbal explanation and written notification to the individual of the denial, the reasons for the denial, the right to appeal the decision, and the procedures for that appeals process. The notification shall be in writing and made within seven (7) business days of the notification from the individual of his/her unwillingness to accept any of the alternative accommodations offered or the determination that there are no alternative accommodations available.
- c. All appeals are reviewed by the Vice President of Student Services. To access the appeals procedure: <https://nwc.edu/handbook/section/subsection/Student-Appeals-Board-Process-and-Procedures>.
- d. If the appeal is denied, the VP of Student Services shall provide written notification of the denial to the individual and a written explanation with all of the reasons for the denial.

- e. An individual may also use the grievance procedure provided under the general College policies. This grievance procedure can be found in the Student Handbook at <http://www.nwc.edu/handbook/section/subsection/Non-Academic-Student-Complaints>.

**7) Confidentiality and Recordkeeping**

- a. In processing requests for reasonable accommodations, the College will take all steps required by federal, state, and/or local law to protect the confidentiality of any information or documentation disclosed in connection with the requests. Measures may include limiting access to information to individuals specifically designated to determine and implement requests for reasonable accommodations, who will disclose the information only to the extent necessary to determine whether to grant the request, determine if the request is unreasonable, and implement any request granted, keeping all written requests and accompanying documentation in a secure area to which only those designated individuals have access, except as otherwise required by law.

**8) Non-retaliation Provision**

- a. NWC will not retaliate against any individual because that individual has requested or received a reasonable accommodation in College housing.