



## **Reasonable Accommodations Policy**

### **For disability accommodations requests in campus housing**

Goshen College recognizes the importance of providing reasonable accommodations in its housing policies and practices where necessary for individuals with disabilities to fully participate in campus housing. This Policy explains the specific requirements and guidelines which govern requests for reasonable accommodation in campus housing. Goshen College reserves the right to amend this policy at any time as circumstances require.

#### **Procedure for Requesting Reasonable Accommodation (Excluding Requests for Service Animals under the Americans with Disabilities Act Amendments Act)**

The directors of the Academic Success Center (ASC), which houses Disability Services for Students, and Residence Life will evaluate whether to grant or deny requests for reasonable accommodation in campus housing. In evaluating the request, they will consult other campus support offices, such as Counseling, as necessary, to determine whether the requested accommodation is necessary and reasonable. Individuals with a disability who reside or intend to reside in campus housing who wish to request a reasonable accommodation should follow the process outlined below.

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

1. Requesting a Housing Accommodation
  - a. An individual with a disability must complete a Disability Accommodation Request Form through the ASC. The form may be filled out in person or will be provided electronically upon request to the ASC director. If the individual requires assistance in completing the Request Form because of his/her disability, the ASC will provide assistance in completing the form.
  - b. Goshen College will accept and consider requests for reasonable accommodation in campus housing at any time. The individual making the request for accommodation should complete a Disability Accommodation Request Form as soon as practicably possible before moving into campus housing. However, if the request for accommodation is made fewer than 60 days before the individual intends to move into campus housing, Goshen College 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

campus housing, he/she should complete the Request as soon as practicably possible, in the Academic Success Center. Goshen College 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, Goshen 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 Disability Accommodation Requests

Goshen College 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 participate fully in campus housing.

- a. **Obvious Disability:** If the individual's disability and the necessity for the accommodation are obvious (e.g. an individual with a physical disability using a wheelchair needs an accessible room), the individual need only explain what type of accommodation she is requesting. No documentation of disability and/or necessity is required under these circumstances.
- b. **Non-Obvious Disability/Necessity**
  - i. If the disability is obvious but the need for the accommodation is not obvious, the ASC may require the individual to designate a reliable third party who can verify that the requested accommodation is necessary to provide the individual an equal opportunity to participate in campus housing, but may not seek information about the individual's disability.
  - ii. If the disability and necessity for the accommodation are not obvious, the ASC will require the individual to designate and provide documentation from a reliable third party who can verify that the individual has a disability and that the requested accommodation is necessary to provide the individual an equal opportunity to fully participate in campus housing.
  - iii. A reliable third party is someone other than a family member who is familiar with the individual's disability and the necessity for the requested accommodation, such as a doctor or therapist.
  - iv. The student may bring documentation, or sign a Release of Information Form, which the ASC will send to the designated third party with a letter requesting information.
  - v. Absent exceptional circumstances, within seven (7) business days of receiving appropriate documentation from the third party, the ASC and Residence Life

team will determine if the accommodation is necessary because of a disability to provide the individual an equal opportunity to fully participate in campus housing.

If the third party provides some documentation, but without sufficient information for the ASC and Residence Life to determine whether an accommodation is necessary, the Director of the ASC will inform the individual in writing of the verification's insufficiency and may request additional information, including speaking directly with the individual supplying the third-party verification, within seven (7) business days of receiving the form.

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

### 3. Determination of Reasonableness

- a. The ASC and Residence Life 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 Goshen 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.
- c. Approval of Accommodation a. If the requested accommodation is deemed necessary and is not unreasonable, a member of the ASC/Residence Life team 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.

### 4. Denial of Accommodation/Appeal

- a. If the requested accommodation is deemed necessary but unreasonable, ASC/Residence Life 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 ASC and Residence Life or there are no alternative accommodations available, ASC 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.
- c. 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.

- d. All appeals are reviewed by the Academic Dean and Dean of Students for ADA/Section 504 Compliance. If the appeal is denied, the Academic Dean and Dean of Students shall provide written notification of the denial to the individual and a written explanation with all of the reasons for the denial within seven business days.

#### 5. Confidentiality and Recordkeeping.

In processing requests for reasonable accommodations, Goshen 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. Such measures may include limiting access to such 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.

#### 6. Non-retaliation Provision

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