Documentation Policy Disability Services

Students requesting accommodations through the Office of Disability Services should be prepared to provide documentation. While documentation is not always necessary, it is usually necessary and useful in the process of determining the scope and structure of reasonable accommodation on a case by case basis, and in the course of requesting accommodation such documentation may be requested by the Coordinator for Disability Services.\(^1\) This documentation policy is rooted in new disability accommodation documentation guidelines promulgated by the Association on Higher Education and Disability in April 2012.\(^2\)

**Testimonial and Observational Documentation**

The Documentation process begins with an interactive process and self-report by the student with the Coordinator of Disability Services.\(^3\) This self-report is crucial to a specific understanding of access barriers that a student may encounter at the University, and the relation between those access barriers and the disability. After learning from the student’s personal narrative, history of experiences, academic history, and past accommodation, the Coordinator is better informed of the nature and significance of the impairment and has a context from which to begin a determination of reasonable accommodation. In some cases, this step will be sufficient by itself to make an informed determination of eligibility for accommodation. The value of this initial disclosure is variable and subjective. Important factors include internal consistency, clarity, and congruency with observation.

**Written or Formal Documentation**

When there are informational gaps in a student’s self-report, and when the existence, scope, and nature of a mental or physical impairment are not apparent, it is appropriate for the Coordinator of Disability Services to request information from the student that remedy the shortcomings of mere observation and discussion. Written documentation will be used to verify the existence and scope of an impairment, provide further context on accommodation history, and can provide the Coordinator with information from medical or psychological professionals on what accommodations are deemed appropriate by those professionals.

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\(^1\) The post-2008 regulations state that the primary purpose of the ADA Amendments “is to make it easier for people with disabilities to obtain protection under the ADA.” 29 C.F. R. Section 1630.1(c) (4).

\(^2\) The AHEAD Guidelines are designed to encourage institutions to avoid unduly burdensome or extensive medical and scientific evidence on the part of an individual requesting disability accommodation, in light of the ADA Amendments Act of 2008. [http://ahead.org/resources/documentation-guidance](http://ahead.org/resources/documentation-guidance)

\(^3\) ...or other appropriate Student Affairs professional in cases where the Coordinator is unavailable within a reasonable time.
For all non-apparent disabilities, the Office of Disability Services will request some form of written documentation that meets the need of the Coordinator for making a determination of qualification for reasonable accommodation. This may include but is not limited to:

- Medical records, reports, or assessments from health care providers.
- Information from school psychologists, teachers, or other education providers.
- Copies of past accommodation history, including Individual Education Programs (IEP) or Summary of Performance (SOP) documents, and plans that may have been implemented in primary and secondary school to comply with Section 504 of the Rehabilitation Act (504 Plans).
- A letter from a treating physician, psychologist or psychiatrist, or other appropriate medical professional.
- Results from appropriate diagnostic instruments administered by a qualified diagnostician.
- An audiogram or visual acuity measurement administered by a qualified professional.
- Information on file with a Vocational Rehabilitation agency.
- Accommodation information from other Colleges and Universities the student may have attended.

External documentation will typically need a level of specificity that meets the need of the Coordinator to fill in gaps from the student’s personal narrative, and which verifies the existence of an impairment and offers context for the nature and scope of the impairment. Documentation of insufficient detail may result in a new documentation request. Documentation must generally be recent enough in time to still be valuable in the accommodation process. The unique attributes of the full range of disability prohibit an exhaustive list of potential documentation sources. Using diagnostic and/or technical information is different than using it for treatment, and a commonsense standard will be applied for interpreting written documentation. When necessary, the Coordinator may consult with other professionals in order to better understand submitted documentation.

**The Determination**

Once the information gathering phase is complete, the Office of Disability Services will notify the requesting student within a reasonable time about which accommodations will be made, as well as overall approval or disapproval of the accommodation request. The fundamental question being asked is: “Would an informed and reasonable person conclude from the available evidence that a disability is likely and the requested accommodation is warranted?”

Accommodation letters will typically have a longevity of one semester, at which time the student must request renewal of their approved accommodations. Requests for ineffective

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modified or requests that amount to a fundamental alteration that fundamentally alters the course or undermines the academic mission of the University will not be deemed reasonable.

**Storage and Sharing of Documentation**

Disability related documentation for students registered with approved accommodations with the Office of Disability Services are kept in the Office of Disability Services for the duration of that student’s enrollment at the University. After a student no longer received accommodations, documents are stored for three years in accordance with State Law.\(^5\) No records will be shared beyond a need-to-know basis without the express written and knowing consent of the student.

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\(^5\) Section 1-59 of the Oklahoma Consolidated General Records Disposition Schedule for State Colleges and Universities, as updated October 16, 2014.