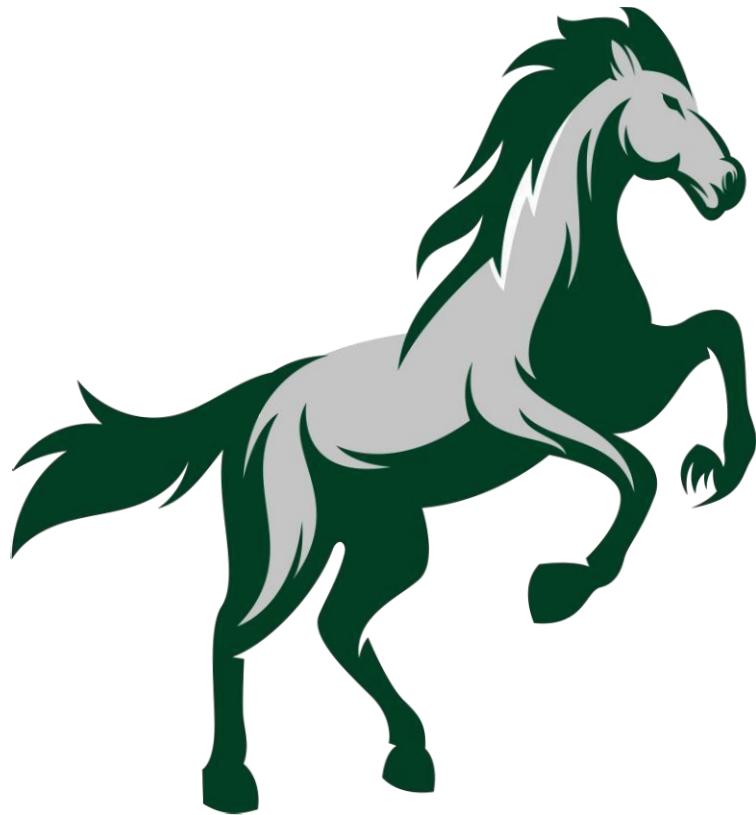

Piedmont Community College

Accessibility Services Policy and Procedures

2025-2026



Piedmont Community College Accessibility Services Policy and Procedures

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Title IV of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act (the “Disability Laws”) require that no qualified individual with a disability be excluded from participation in or be denied the benefits of any of Piedmont Community College’s (PCC) services, programs or activities based on one’s disability. PCC strives to make all hard copy and electronic resources, including website content, accessible to all users. The College complies with Disability Laws by providing reasonable modification in its rules, policies, and practices, by removing architectural, communication, and transportation barriers, and by providing auxiliary aids and services, when necessary to ensure that individuals with disabilities who meet the College’s essential eligibility requirements for the receipt of services or participation in College programs or activities are afforded equal opportunities to those of nondisabled individuals. We are committed to ensuring equal access for disabled students, staff and faculty, as well as guests and visitors to its campuses. PCC permits Service Animals and Service Animals-in-Training, in accordance with North Carolina General Statute 168-4.2. B and the provisions of college policy.

A. Requesting Accommodations

The student or individual seeking accommodations should submit a Student Accommodation Request form to the Office of Accessibility Services. Accommodation requests may be submitted at any time; however, accommodations cannot be provided retroactively.

To allow adequate time to arrange accommodation services, Accommodation Requests should be submitted at least 2 weeks prior to the start of class(es). Accommodation and modifications received in high school or other post-secondary institutions do not automatically transfer to PCC. Instead, it is necessary for students to request accommodations by submitting the following documentation:

- Student Accommodation Request Form (completed by the student).
- Current documentation prepared by a medical professional or health care provider describes the student’s or applicant’s diagnosis, the functional limitations this diagnosis causes, and the accommodations/services necessary to address the diagnosis. Documentation guidelines based on the type of disability are provided on PCC’s website.
- If applicable, provide a previous copy of an Individualized Education Plan (IEP), Summary of Performance (SOP), or a 504 Plan.

All accommodation decisions are made through an individualized, interactive process between the student and OAS. Determinations are never automatic or categorical and are based on documentation, functional limitations, and the requirements of the academic program.

B. Intake Counseling Session

Students or potential students requesting accommodation services must schedule an Intake Counseling session with the Office of Accessibility Services. All disability-

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related documentation is confidential and maintained separately from academic records in accordance with ADA and FERPA. Information is shared only with personnel who have a legitimate educational need to know. The purpose of the session is to discuss the College's accommodation policy, procedures, and practices.

During the Intake Counseling Session, the Office of Accessibility Services will: Provide the student with documentation requirements and answer any questions they may have in relation to disability services.

1. Clarify the course(s) for which the student is seeking accommodations. Students must submit the required documentation to the Office of Accessibility Services to begin services. Students are requested to share information about their disability and what accommodations they believe would be appropriate.
2. The Office of Accessibility Services will review and discuss various aspects of college life including reading, writing, note taking, math, tutoring, testing, transitioning, becoming an active member of the campus community, as well as discussion regarding available campus resources and services. A formal decision in relation to accommodation services will be made once all the required documentation is received, and the Office of Accessibility Services has met with the student.
3. Student has the right to request additional consideration/accommodations based on additional medical documentation from a qualified medical provider. This process shall be interactive and individualized.

C. Determination of Accommodations

Accommodations are determined on an individual basis. Students must provide appropriate verification of the disabilities for which they seek accommodation. Students must be willing to discuss the disabilities they want accommodated with Accessibility Services staff members.

The accommodation must be reasonable, must be effective for the student, and fit both the disability and the educational setting. Determining what is effective may require discussions between the student, the Office of Accessibility Services, and College personnel (including faculty), and other experts. When an accommodation request may intersect with academic integrity or essential technical standards, OAS will consult with appropriate faculty or academic leadership prior to finalizing the determination. The Office of Accessibility Services determines accommodations. Any modification to accommodation services must be approved by the Office of Accessibility Services. All accommodation decisions are made through an individualized, interactive process between the student and OAS. Determinations are never automatic or categorical and are based on documentation, functional limitations, the educational environment, and the requirements of the academic program.

Reasonable accommodations for qualified students must comply with the academic and technical standards required for participation in any educational program or service. According to Federal regulation, colleges are not required to alter the purpose

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and nature of the program, course, and/or service as part of the reasonable accommodation process. Reasonable accommodation does not negate requirements for successful completion of a program, course, service and/or activity or adherence to academic, accreditation, and behavior standards. Rather, reasonable accommodation allows access to full participation in a program. Any time a student requests additional accommodation, he/she must notify the Office of Accessibility Services for consideration. All relevant documentation will be reviewed and follow the guidelines and processes described above.

C.1 Scope and Limitations of Accommodations

Accommodations are designed to provide equal access, not to guarantee academic success or to modify essential programmatic or technical standards. Reasonable accommodations cannot fundamentally alter course objectives, instructional methods, grading criteria, or essential learning outcomes.

D. Provisional Accommodations

Provisional accommodations may be provided for students for a specific number of working days or one semester, pending the receipt of official and complete documentation of a student's medical condition or disability. These cases will be handled individually and at the discretion of the Coordinator of Accessibility Services. Provisional accommodations, if approved, will be for up to *one* semester only pending further appropriate documentation.

E. Students with Temporary Physical Impairments

Students with short-term impairments may be granted accommodation for the duration of their condition. Appropriate documentation addressing the length of the impairment must be provided before any accommodation can be granted. Any temporary accommodation will be noted on the Letter of Accommodation with an expiration date. It must be understood that by voluntarily providing or arranging such help, PCC does not suggest that temporarily injured or impaired students qualify as "individuals with a disability" under the ADA.

F. Enrollment at Satellite Campuses

Assistive equipment may vary between campuses. If a student plans to attend courses at Caswell, Roxboro, or South Campus, they need to notify the Office of Accessibility Services to arrange for equipment accessibility.

G. Letter of Accommodation – Student Responsibilities

The Letter of Accommodation provides the student with a tool for arranging accommodations with faculty and staff. Although the Letter of Accommodation states that

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the student has a disability; it does not contain a description of the disability due to confidentiality issues.

Accommodation contained within the Letter of Accommodation should not be compromised, and any significant departure should be discussed with the Office of Accessibility Services. Faculty members are not required to provide accommodation if they have not received an accommodation letter prepared by the Office of Accessibility Services. For all accommodation, a student must initiate services. He or She must give the accommodation letter to the instructor indicating what his or her needs are. When a test is near and accommodation is allowed, the student must request the desired and appropriate accommodation for each exam from his/her instructor. If that student is allowed to be a note taker, he/she must communicate with the instructor about how that request is fulfilled. These guidelines and procedures are provided to help students with disabilities develop self-advocacy skills. If at any time a student feels that he/she is having trouble or does not get what he/she needs, the student should return to the Office of Accessibility Services for additional assistance.

H. Documentation and Verification Guidelines

General Guidelines:

To receive disability-related accommodations, students are required to submit documents of disability to verify eligibility under the Americans with Disabilities Act, the ADA Amendments Act (ADAAA), Section 504 of the Rehabilitation Act of 1973, and Piedmont Community College Disability Services policy. OAS generally completes documentation review within 5–10 business days. More complex cases may require additional time to ensure appropriate evaluation and individualized assessment.

For these purposes, disability is defined as a physical or mental impairment that substantially limits one or more life activities. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. Documentation of disability assists the Office of Accessibility Services in collaboration with the student to determine reasonable accommodations and/or services, which are provided on a case-by-case basis. If the submitted documentation is incomplete or does not support the student's request for accommodations and/or services, the student may be asked to provide additional documentation.

The cost of obtaining all documentation is the responsibility of the student. Documentation, along with the Request for Accommodation Services form, should be submitted to Accessibility Support Services at least 2 weeks in advance of class start date to allow arrangement of appropriate accommodation and/or services. Students are encouraged to contact Accessibility Services for guidance on the documentation needed for their individual situations. In general, the documentation should include the following:

Qualifications of Clinician/Provider

Documentation must be typed on office or practice letterhead, dated and signed by a professional who is licensed or certified in the area for which the diagnosis is made.

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Name, title, and license/certification credentials must be stated and shall not be family members or others with a close personal relationship to the individual.

Diagnosis & History

A diagnostic statement identifying the disability including ICD or DSM classification along with any relevant personal, psychosocial, medical, developmental and/or educational history. ***Description of Diagnostic Methodology:*** A full description of the diagnostic methodology used, including data and measurements from appropriate evaluation instruments. The results obtained should draw a direct link to the diagnosis and the functional limitations of the disability. For cognitive disorders, evaluations should use adult norms.

Current Impact and Functional Limitations

A clear description of the level of severity along with the current impact and functional limitations of the condition pertaining to the academic and/or residential settings. Information regarding whether symptoms are constant or episodic, and the frequency and/or duration should be addressed. Changing conditions and/or changes in how a condition impacts the individual may warrant more frequent updates. Any treatments, medications, and/or assistive devices/services currently prescribed or in use, should include a description of the mediating effects and potential side effects from such treatments.

Recommendations

Recommendations are welcomed and considered; however, the Office of Accessibility Services makes the ultimate determination on eligibility and reasonable academic adjustments necessary to provide equal access for participation in academic courses, programs, and activities. Recommendations should be directly linked to the impact or functional limitations associated with the disability, or medication prescribed to control symptoms, and include a clear rationale based on level of impairment.

Personal Preferences:

Under federal law, including the ADA and Section 504, accommodations must be supported by documentation that demonstrates a clear **nexus between the diagnosed disability and the barrier to access**. Requests that reflect *personal preferences*—meaning choices, comforts, or individualized study habits not directly tied to a documented functional limitation—are **not considered reasonable accommodations**. Personal preferences do not meet the legal threshold for academic adjustment because they are not necessary to provide equal access to the curriculum. Examples of personal preferences include but are not limited to preference for a private room for comfort, preference to read aloud without documentation, preferred seating without a documented need, or additional time beyond what functional limitations support. Accordingly, any request that does not establish a direct,

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evidence-based connection between the disability and the access need will be denied. Students may submit updated or additional medical or psychological documentation at any time to support reconsideration. Accommodations cannot be approved if they provide an academic advantage, alter essential course requirements, or exceed what is necessary for equal access under federal law.

I. Types of Services Provided

Audio Book:

An audio book is an electronic textbook that has been converted into sound such as an MP3 file and recorded onto a flash drive. When a student requests an audio book, they will receive MP3 files on a flash drive provided by the student. No electronic visual material accompanies the MP3 files. MP3 files will play on portable MP3 devices, home computers, and all PCC computers.

Alternative Format Book:

Sometimes, a student's disability requires an enlarged textbook or access to both the visual material and audio files. This is referred to as an alternative format textbook on a flash drive. An alternative format textbook on flash drive will have Microsoft Word, Notepad, or PDF files in place of MP3 files.

E-Textbooks:

E-textbook is short for "electronic text," which is accessible on a computer in electronic format. This is typically accomplished by using software such as Microsoft Word, Adobe PDF Reader, or Notepad. E-textbooks can be used in several different ways. With special software such as screen readers or document readers, e-text can be audibly "read" by a computer. E-text may also be converted into MP3 files, which can be played on any computer or portable MP3 player.

Book Scanning:

Some textbooks utilized at PCC are not available as e-textbooks, audio, or alternative book formats. When this is the case, students may request their textbook be scanned and provided to them in an alternative format. However, this should only be done when an e-textbook, audio, or alternative book format is not available for purchase through the publisher. Scanning books offered in alternative formats through the publisher is a violation of copyright law and may result in legal action. Once PCC staff has verified that an alternative format of a textbook is not available, only then may staff provide book scanning services to students who receive such accommodations. Alternative format textbooks generally take anywhere from two weeks to a month to create. Below are guidelines for the book scanning process:

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The student must bring their textbook(s) and proof of purchase of the book(s) for which they are requesting to be scanned.

Once the proof of purchase has been verified by PCC staff, students must complete an Alternative Book Request Form. Be sure the students understand their book will be cut and rebound as part of the scanning process.

Students requesting book scanning services may request a specific file format. However, due to time restrictions and depending on the size, design, and content of the book, it may not be possible to provide one format over another. In all cases, the content students receive will be accessible and accommodating to their needs.

Note Takers:

PCC, with faculty members, will coordinate the arrangements for note takers. When possible, note takers will be introduced confidentially to the student for whom the service is provided. Once the instructor has received an accommodation request for a note taker, a volunteer from the class should be requested to provide note taking services. Once a volunteer is secured, they are forwarded to the Office of Accessibility Services to receive training and a carbonless note pad.

Scribes and Readers:

PCC will provide scribe and reader services for course examinations when such services have been determined by PCC to be reasonable accommodation. If a scribe is needed, students should make an appointment with the Office of Accessibility Services at least 5 days prior to the test date and notify the instructor that testing material/packet should be forwarded to the Office of Accessibility Services.

Assistive Equipment:

The College will provide reasonable modifications to college owned equipment utilized by students for class and study activities. The Office of Accessibility Services is not responsible for providing personal devices or services, including, but not limited to wheelchairs, individually prescribed devices such as prescription eyeglasses or hearing aids, readers for personal use or study, or services of a personal nature including assistance in eating or toileting. The Office of Accessibility Services will assist students, primarily by referral, in obtaining auxiliary aids or services from other agencies. Students who qualify may need to request Vocational Rehabilitation Services and/or Veteran's Affairs to supply them with special equipment and assistance.

Available assistive equipment includes:

Tape Recorders
Keyboards (Braille and/or Large Print)
Screen Magnifier
Headphones for quiet testing
Large Calculators

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Students will be required to sign an agreement to return the borrowed equipment or pay the purchase price. A hold flag can be placed on a student's record for not returning College property

Tutoring:

PCC provides individual and group tutoring services for curriculum students. Students are encouraged to utilize in-person or online tutoring services through The Learning Commons. For additional information, visit The Learning Commons located within the college's Learning Resource Center.

Testing Accommodations:

Testing accommodations may include testing in a reduced distraction environment. It is the instructor's responsibility to ensure this accommodation is provided. A distraction-reduced environment refers to a testing location that is reasonably quiet and has fewer sensory stimuli than a typical classroom. This includes limiting noise (e.g., limited verbal communication, background noise, or creaking chairs) and minimizing activity (e.g., no people entering or leaving the room). The setting does not need to be completely silent, sterile, or private. Students may test alongside others, provided the space supports starting and completing the exam with minimal interruptions. Where a particular accommodation results in transcription or recording of a classroom lecture or presentation, students should recognize that such lectures or presentations are the intellectual property of the individual professor and/or PCC. Copying, publishing, or distributing transcripts to anyone, without prior written approval of the College and the professor, is strictly prohibited. When tape recording is determined to be accommodation, the student must sign a form acknowledging the above statement.

Sign Language Interpreters:

Interpreter services, such as American Sign Language, will be provided for qualified students with proper documentation. Professional sign language interpreters will be provided by PCC. However, due to the limited availability of interpreters, it is strongly suggested that students who need interpreting services contact PCC each semester, at least one month before classes begin. Students requiring interpreters must submit printed class schedules to the Office of Accessibility Services. Students needing interpreting services for appointments with student service areas should request services at least five days in advance. PCC will coordinate appointments by communicating time and location for student service area appointments. If there is a request by a student or faculty member to extend the time of the interpreting assignment, the interpreter must contact the Office of Accessibility Services for prior approval.

The interpreter should report to every class unless notified by the Office of Accessibility Services. Time will be rounded up the quarter hour for classes and for other assignments, such as appointments and conferences.

Students and interpreters must contact PCC if they are absent from class. An absence from a class may be considered missing the entire class or missing thirty (30) minutes or more of any class period.

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J. Service Animals and Service Animals-in-Training Policy

Students with disabilities may bring a Service Animal to campus. Individuals actively training such animals may bring a Service Animal-in-Training, as permitted by North Carolina General Statute §168-4.2. B and College policy. A Service Animal is defined as a dog trained to perform specific tasks directly related to a person's physical, sensory, psychiatric, intellectual, or other mental disability. A Service Animal-in-Training is a dog undergoing training to perform those tasks. Support Animals, which provide emotional comfort but are not trained to perform tasks, are not recognized as Service Animals under the ADA.

Students planning to bring a Service Animal must notify the Office of Accessibility Services (OAS) in advance. OAS may ask two questions: (1) Is this a service animal required for a disability? and (2) What tasks has the animal been trained to perform? For Service Animals, students must provide a letter from a licensed clinician on official letterhead confirming the disability-related need and the specific tasks the animal performs. For Service Animals-in-Training, a letter from the training organization must outline the animal's role and training purpose.

Handlers are responsible for always maintaining control of the animals. Animals must be vaccinated, licensed, and in good health. They must be leashed unless the leash interferes with the animal's work. Identification such as a vest or tag is encouraged for Service Animals and required for those in training. Handlers must clean up after their animals and ensure they are housebroken and well-groomed.

Students with allergies or other health concerns related to animals should contact OAS. The College will make reasonable efforts to balance the rights and needs of all students while maintaining a safe, inclusive environment.

Community Guidelines

All College members must:

- Allow Service Animals to accompany handlers in all areas.
- Not touch, feed, distract, or interfere with Service Animals.
- Refrain from asking about the individual's disability.
- Handlers whose animals are removed may continue to access services without the animal.

K. Removal Criteria

An animal may be excluded if it:

- Is out of control,
- It is not housebroken,
- Poses health or safety risk,
- Disrupts the educational environment.

L. Requirements for Faculty, Staff, Students, and Other Members of the College.

Faculty may provide approved accommodations without the intervention of OAS, and in these cases, OAS does not need to be notified of the arrangements. However, if the faculty member is unable to provide the approved accommodations, the student must notify OAS at least forty-eight (48) hours prior to a regularly scheduled examination so

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that appropriate arrangements can be made. All examinations will be taken at the regularly scheduled time unless an alternative has been approved by the faculty member.

L.1 If a faculty member believes that implementing approved accommodation would modify an essential requirement of the course, the concern must be referred to OAS to initiate the fundamental alteration process, a documented and collaborative review of essential course requirements and possible reasonable alternatives. (See Appendix D.)

Any student who arrives late for a scheduled exam must finish the test in the time remaining; extended time will be calculated from the scheduled start of the exam, not the time of arrival.

M. General Complaint and Appeal Process:

If a student believes that they have been wrongly denied a requested academic adjustment or accommodation, they have the right to appeal that decision in accordance with the College's standard **Appeal and Grievance Procedures**. For additional policy and procedural information, students should refer to the **PCC Catalog and Student Handbook**.

To ensure equitable access while maintaining appropriate levels of accommodation, the Office of Accessibility Services (OAS) uses a **Standardized Documentation Review Process** to evaluate disability-related information and determine eligibility for all academic accommodations and auxiliary aids. This includes, but is not limited to, instructional, technological, testing, communication, and classroom-based adjustments. Eligibility is determined through an individualized assessment that considers:

1. A qualifying diagnosis;
2. Substantial functional limitations that impact academic access; and
3. A clearly demonstrated nexus between the documented disability and the specific accommodation requested.

This structured, evidence-based framework promotes fairness, consistency, and compliance with ADA and Section 504 requirements while ensuring that accommodations are appropriately tailored to support equal access to all academic programs, courses, and activities.

N. Clarification on Testing Accommodations

Reduced Distraction Testing Environment Separate testing accommodations exist along a continuum of restrictiveness. RDTE is considered moderately restrictive accommodation; TPRA is considered highly restrictive accommodation and requires robust documentation of need.

Reduced Distraction Testing Environment

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RDTE is defined as a setting that minimizes common distractions such as noise, movement, and visual stimuli but may still include other students. This environment may contain other students testing and is not intended to be sterile or private. This testing accommodation is designed for students who need a smaller more controlled environment.

Eligibility Criteria:

1. Diagnosis Requirement:

The student's documentation must state a diagnosis that supports the need for a reduced distraction environment.

If yes, proceed to Step 2.

If no, the student is **not eligible** for RDTE.

2. Justification Requirement:

The documentation must provide a clear explanation of how reduced sensory input (e.g., no background noise, minimal movement, quiet surroundings) is necessary for equitable access.

If yes, the student is **eligible** for RDTE.

If no, the student is **not eligible** for RDTE.

Testing in a Private Room Accommodation (TPRA)

TPRA refers to more restrictive accommodations in which a student tests alone in a private space, typically under individual proctoring. This level of accommodation is reserved for students whose documented needs cannot be met in a less restrictive setting.

Eligibility Criteria:

1. Diagnosis Requirement:

The documentation must include a diagnosis that justifies highly restrictive testing of accommodation?

If yes, proceed to Step 2.

If no, the student is **not eligible** for TPRA.

2. Rationale Requirement:

The documentation must include an unambiguous statement explaining why testing in a private room is necessary?

If yes, proceed to Step 3.

If no, the student is **not eligible** for TPRA.

3. Assessment of Less Restrictive Alternatives?

OAS will evaluate whether the student's testing needs can be reasonably accommodated in a Reduced Distraction Testing Environment.

If yes, the student is **not eligible** for TPRA.

If no, the student is **eligible** for TPRA.

Appendix of Terms

The following glossary provides definitions of key terms used throughout this policy. These terms support consistent interpretation and application of accommodation procedures in accordance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and federal OCR (Office for Civil Rights) guidance.

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Academic Adjustment / Accommodation

A modification, auxiliary aid, or support that enables equal access for a qualified student with a disability. Accommodations cannot fundamentally alter essential course requirements, lower academic standards, or change the nature of a program.

Access Need

A documented requirement directly related to a functional limitation that must be addressed to ensure the student can participate equally in academic programs, courses, or activities. Access needs must be supported by disability-related documentation.

Auxiliary Aids and Services

Supports that provide effective communication or access, including interpreters, captioning, accessible materials, assistive technology, alternative formats, and note-taking assistance.

Disability

A physical or mental impairment that substantially limits one or more major life activities, such as learning, concentrating, reading, communicating, seeing, hearing, or performing manual tasks.

Documentation

Written information from a qualified provider that identifies a disability, describes functional limitations, and supports the accommodations requested. Documentation may include medical records, psychological evaluations, diagnostic reports, or prior school plans (IEPs/504 Plans).

Functional Limitation

A substantial restriction caused by a disability that impacts a major life activity within the academic environment. Examples include difficulty concentrating, reading, processing information, or managing time due to a documented condition.

Highly Restrictive Accommodation

An accommodation that significantly departs from typical academic processes or testing environments and is only approved when documentation provides a clear and compelling justification.

Examples include:

- Testing in a Private Room
- One-on-one proctoring
- Use of specialized equipment or procedures

Individualized Assessment

The legally required process in which OAS evaluates documentation, functional limitations, student self-report, and course requirements on a case-by-case basis. No accommodation decision is automatic or categorical.

Interactive Process

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A collaborative dialogue between the student and OAS to explore the impact of the disability, review documentation, determine reasonable accommodations, and ensure access to academic programs.

Nexus

The documented, disability-related connection between a functional limitation and the specific accommodation requested. OCR guidance requires a clear nexus to justify accommodations.

Personal Preference

A request based on comfort, convenience, or personal study habits rather than a documented disability-related access need. Personal preferences are not considered accommodations under ADA/504 and will be denied if no nexus to functional limitation is established.

Provisional Accommodation

Temporary accommodation granted for a limited period while the College awaits updated or complete documentation. These determinations are made individually and may be adjusted once additional information is received.

Reduced Distraction Testing Environment (RDTE)

A moderately restrictive testing accommodation designed to limit common distractions (noise, movement, visual stimuli). RDTE may include other students and does not provide full privacy.

Testing in a Private Room Accommodation (TPRA)

A highly restrictive testing accommodation in which the student tests alone. TPRA requires strong documentation demonstrating that less restrictive environments, such as RDTE, are insufficient to meet access needs.

Substantial Limitation

A significant restriction affects a major activity of life compared to most people in the general population. Substantial limitations must be verified through documentation and are essential to determining accommodation eligibility.

Appendix B: Accommodation Determination Flowchart

This appendix outlines the decision-making process used by OAS to ensure consistency, fairness, and compliance with federal regulations.

Step 1 – Student Request

- Student submits Accommodation Request Form.
- Student provides documentation or seeks guidance on required materials.

Step 2 – Documentation Review

OAS evaluates documentation for:

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1. **Diagnosis**
2. **Functional limitations**
3. **Nexus to requested accommodations**
4. **Current relevance and completeness**

If documentation is insufficient → student is notified and may submit additional information.

Step 3 – Intake Counseling Session

During the interactive meeting, OAS:

- Reviews student self-report
- Clarifies academic environments
- Discusses previous accommodations
- Identifies potential access barriers

Step 4 – Individualized Assessment

OAS analyzes:

- The documented disability
- Functional limitations
- Course/program requirements
- Level of accommodation restrictiveness (least-to-most)
- Alternatives and feasibility

Step 5 – Accommodation Determination

OAS determines reasonable accommodations based on:

- Disability-related need
- Functional limitations
- Essential academic requirements
- Institutional capabilities

OAS prepares a **Letter of Accommodation (LOA)**.

Step 6 – Student Notification

OAS meets or communicates with the student about:

- Approved accommodations
- Implementation responsibilities
- Appeal rights

Step 7 – Faculty Notification and Coordination

Students provide the LOA to their instructors.

OAS collaborates with faculty as needed to ensure proper implementation.

Step 8 – Ongoing Monitoring

OAS continues to:

- Provide support as needed
- Update accommodations upon new documentation
- Address student or faculty concerns

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- Modify accommodations when appropriate

Appendix C: Faculty & Instructional Staff Responsibilities Guide

This appendix outlines expectations for faculty and academic staff regarding the implementation of accommodations. These guidelines reflect ADA, Section 504, and OCR guidance.

I. Receiving Accommodation Letters

Faculty will receive Letters of Accommodation (LOAs) directly from students.

Faculty must:

- Review the LOA promptly
- Maintain confidentiality
- Implement accommodations listed
- Contact OAS immediately if there are questions or concerns

II. Implementing Testing Accommodations

Faculty are responsible for ensuring:

- RDTE testing occurs in a quiet, reduced-distraction space
- **Private Testing (TPRA)** is facilitated in private room as specified by the student's letter of accommodation.
- When TPRA is approved, **the instructor is responsible for arranging a suitable private room**, ensuring the space is quiet, secure, and appropriate for individual testing.
- Extended time is accurately calculated
- Students requesting alternative formats, readers, or scribes notify OAS

Faculty must provide exams to OAS when proctoring support is required.

III. Instructional Accommodations

This may include (as applicable):

- Early access to materials
- Accessible course content
- Note-taking accommodations
- Assistive technology integration
- Captioned videos or alternative formats

Faculty should contact OAS for guidance if unsure how to implement specific accommodation.

IV. Maintaining Academic Integrity

Accommodations cannot:

- Lower academic standards
- Alter essential learning outcomes

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- Change teaching methods in ways that fundamentally alter the course

Faculty may consult OAS when determining whether a requested modification intersects with essential requirements.

V. Communication & Consultation

Faculty are encouraged to collaborate with OAS when:

- A student raises implementation concerns
- There is a potential conflict between accommodation and course requirements
- Additional support is needed for implementation

VI. Reporting Concerns

Faculty should inform OAS when:

- A student is not using accommodations
- Accommodation appears ineffective
- There is a pattern of missed exams, appointments, or noncompliance
- Health, safety, or classroom disruption concerns arise

VII. Legal Obligations

Faculty must adhere to:

- ADA (Titles II and III)
- Section 504 of the Rehabilitation Act
- FERPA confidentiality
- PCC policies and procedures

Failure to implement approved accommodations may constitute discrimination under federal law.

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Appendix D: Fundamental Alteration Process Flow Chart

1. Accommodation Approved by OAS

OAS determines that the requested accommodation is reasonable based on disability documentation, functional limitations, and ADA/504 criteria.

2. OAS Notifies Faculty

Faculty receive the approved accommodation and begin planning for implementation.

3. Faculty Identifies a Potential Conflict

Faculty determine that implementing the accommodation may:

- Alter an essential course requirement,
- Modify a fundamental pedagogical method, or
- Change the nature of assessment or competency demonstration.

4. Faculty Notifies OAS Immediately

Faculty must not independently deny, change, or refuse approved accommodations. Any concern about impact on essential requirements must be referred to OAS.

5. OAS Initiates the Fundamental Alteration Review

OAS convenes a collaborative review that may include:

- The course instructor,
- The program director or department chair,
- Academic leadership (as necessary),
- OAS staff facilitating the process.

6. Collaborative Analysis of Essential Requirements

The review examines:

- The specific essential requirement(s) potentially affected,
- How the accommodation interacts with those requirements,
- Whether reasonable alternatives exist that preserve course integrity,
- Whether implementation would fundamentally alter the course, program, or competency expectations.

7. Decision Reached

OAS documents the outcome of the review:

- **Option A:** The accommodation *can* be provided without fundamentally altering essential requirements.
- **Option B:** The accommodation *cannot* be implemented because it would fundamentally alter essential requirements (including rationale); a reasonable alternative accommodation is identified.

8. Student Notification

Piedmont Community College Accessibility Services Policy and Procedures

OAS provides written notification to the student that includes:

- The decision,
- The rationale,
- Any approved alternative accommodations,
- Information on appeal or grievance procedures.

9. Implementation

Faculty and OAS implement the approved accommodation or the approved alternative promptly and consistently.