

## Procedures for Disability Accommodation Requests

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Issued: December 15, 2023.

Last Updated: December 15, 2023

### Procedure Introduction

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The purpose of this procedure document is to clarify the processes and responsibilities related to the Disability Accommodation Policy. The University assesses the need for disability related accommodations on a case-by-case basis and individuals seeking disability related accommodations may need to actively participate in the interactive process.

### Responsibilities

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POSITION or OFFICE	RESPONSIBILITIES
Individual with a disability	<ol style="list-style-type: none"> <li>1. Provides appropriate applications and/or documentation from qualified treating providers of the disability and the disability related need for accommodation.</li> <li>2. When requested, participates in the interactive process with appropriate University personnel.</li> <li>3. Communicates concerns or issues with the implementation of approved accommodations, or changes in disability status or accommodations with appropriate University personnel.</li> </ol>
The Office of Institutional Accessibility and ADA Compliance (OIA); Interactive Process Center of Expertise (IPCOE)	<ol style="list-style-type: none"> <li>1. Follows EEOC recommended guidelines for an “interactive process.”</li> <li>2. Recognizes an accommodation request and gathers necessary information to process the request.</li> <li>3. Explores accommodation options with the employee, their supervisor, and HR Partner. For each accommodation under consideration, consider if it Reasonable, Effective, or imposes an Undue Hardship.</li> <li>4. Communicates decisions to the employee, their supervisor, and HR Partner and LOA Specialist (if applicable) and help develop an implementation plan for approved accommodations.</li> <li>5. Follows up and monitors approved accommodations and re-engages in the interactive process as needed.</li> <li>6. Documents the entirety of the interactive process and securely stores employee documentation, accommodation decisions, and related documents for workplace accommodation requests.</li> </ol>
Individual with a disability	<ol style="list-style-type: none"> <li>1. Provides appropriate applications and/or documentation from qualified treating providers of the disability and the disability related need for accommodation.</li> <li>2. When requested, participates in the interactive process with appropriate University personnel.</li> <li>3. Communicates concerns or issues with the implementation of approved accommodations, or changes in disability status or accommodations with appropriate University personnel.</li> </ol>

<p>The Office of Institutional Accessibility and ADA Compliance (OIA); Interactive Process Center of Expertise (IPCOE)</p>	<ol style="list-style-type: none"> <li>1. Follows EEOC recommended guidelines for an “interactive process.”</li> <li>2. Recognizes an accommodation request and gathers necessary information to process the request.</li> <li>3. Explores accommodation options with the employee, their supervisor, and HR Partner. For each accommodation under consideration, consider if it is Reasonable, Effective, or imposes an Undue Hardship.</li> <li>4. Communicates decisions to the employee, their supervisor, and HR Partner and LOA Specialist (if applicable) and help develop an implementation plan for approved accommodations</li> <li>5. Follows up and monitors approved accommodations and re-engages in the interactive process as needed.</li> <li>6. Documents the entirety of the interactive process and securely stores employee documentation, accommodation decisions, and related documents for workplace accommodation requests.</li> </ol>
<p>The Office of Student Accessibility Services (OSAS)</p>	<ol style="list-style-type: none"> <li>1. Follows ADA review processes and practices for students requesting accommodations.</li> <li>2. Receives and evaluates student accommodation requests.</li> <li>3. Communicates decisions related to accommodation requests with students and when appropriate campus partners who actively participate in implementation of some accommodations (i.e., housing, dining, testing facilities).</li> <li>4. Securely stores student documentation, accommodation decisions, and related documents for student accommodation requests.</li> </ol>
<p>University Departments and Units hosting Events</p>	<ol style="list-style-type: none"> <li>1. Provide available contact information such as phone, email, website, and/or rsvp sites to guests to ease the process of contacting organizers to request accommodation.</li> <li>2. Provide clear guidance on the process of guests requesting disability related accommodations to attend/participate in USC sponsored, planned, and hosted events.</li> <li>3. Use the recommended <a href="#">accommodation statement</a> for event registration materials and event advertisements.</li> <li>4. Consult with the <a href="#">Office of Institutional Accessibility and ADA Compliance (OIA)</a> regarding accommodation requests that may be unfamiliar to the organizer(s).</li> </ol>

**Procedure Details**

Action #	Responsible Stakeholder	Details
1.0	Employees (Faculty, Staff, or USC Employed Students)	<ol style="list-style-type: none"> <li>1. Employees contact the <a href="#">Office of Institutional Accessibility’s Interactive Process Center of Expertise</a> to initiate accommodation request process. Email <a href="mailto:employeeada@usc.edu">employeeada@usc.edu</a> to submit a formal accommodation request.</li> </ol>

		<ol style="list-style-type: none"> <li>2. Employees must submit medical certification from a qualified actively treating medical provider for medical conditions (no diagnosis necessary) that will require the use of an accommodation and how the accommodation will assist the employee with their essential job functions, if an accommodation is not obvious</li> <li>3. Employees after submitting request and documentation, will receive communication from an OIA Disability Accommodation Coordinator to set up a time to speak about their request, documentation, any follow-up, and next steps.</li> <li>4. Employees will have their full request reviewed by an OIA Disability Accommodation Coordinator to determine reasonable and appropriate accommodation(s). The HR Partner will be contacted to determine if the office/department/unit believes there are any fundamental alterations to be considered in the accommodation process.</li> <li>5. Individuals approved for an accommodation will be provided a letter of accommodation from their OIA Disability Accommodation Coordinator.</li> <li>6. Manages the interactive process with employee and supervisor(s).</li> </ol>
2.0	Students	<ol style="list-style-type: none"> <li>1. Students complete an application for accommodation(s) at <a href="http://www.osas.usc.edu">www.osas.usc.edu</a> (click on Log in – To MYOSAS to create an account). You may contact <a href="mailto:OSASFrontDesk@usc.edu">OSASFrontDesk@usc.edu</a> should you have questions.</li> <li>2. Students must provide information/documentation from a qualified treating medical provider that would reasonable support their requested accommodation(s). Documentation may be directly uploaded to your MyOSAS portal at <a href="http://www.osas.usc.edu">www.osas.usc.edu</a>.</li> <li>3. Students may be contacted by an OSAS Accessibility Specialist to set up a time to speak about their accommodation request.</li> <li>4. Students will have their application and documentation reviewed for their accommodation request.</li> <li>5. Students will be notified via email regarding their accommodation request determinations.</li> </ol>

		6. Students must log into their MyOSAS account to complete the process by attaching approved accommodations to their classes and submit the class specific accommodation letters to the individual faculty (or the academic unit’s designee per professional programs).
3.0	Guests	<ol style="list-style-type: none"> <li>1. Contact the University department or unit hosting the event to discuss accommodation request(s) for the event.</li> <li>2. Guests who are unclear about who to contact may contact <a href="#">OIA</a> to obtain assistance identifying the appropriate individuals.</li> </ol>

**Definitions**

Term	Definition
Individual with a disability	An individual with a disability is a person who has a physical or mental impairment that limits one or more of the person’s major life activities.
Reasonable Accommodation(s)	A reasonable accommodation is available to qualified individuals with disabilities and may include modifications or adjustments to tasks, to environments in which tasks are customarily performed, or to allow for equitable access to a physical environment, a program or service, a job application process, an employment privilege or benefit, or an activity hosted by USC. Reasonable accommodations are meant to provide individuals with disabilities an equal opportunity to participate in and perform essential functions. Reasonable accommodations are determined on an individualized basis and may not fundamentally alter the nature of a program or service or result in an undue administrative or financial burden. Permanent removal of an essential job function or fundamental alterations of a course or program requirement are not considered reasonable accommodations.
Formal Request for Accommodation(s)	Formal processes exist for students, employees, job applicants and guests requesting accommodations. Students should contact the <a href="#">Office of Student Accessible Services (“OSAS”)</a> , employees and job applicants should contact the <a href="#">Office of Institutional Accessibility and ADA Compliance (“OIA”)</a> , and guests should contact the sponsoring division of the event they wish to attend to learn about the required formal accommodation request processes. Guests who are unclear about who to contact may contact OIA to obtain assistance in identifying the appropriate individuals.

Interactive Process	A means by which the individual with a disability and the USC designated unit(s) responsible for disability accommodations collaboratively work together in a timely manner and in good faith to determine reasonable accommodations.
Fundamental Alteration	A change that significantly alters the essential nature of a service, program, activity, or educational experience.
Auxiliary Aid(s)	Devices or services that enable effective access.
Qualified Individual with a Disability	For a student, an individual with a disability who satisfies the requisite skills, experiences, education, and requirements of an educational program or for an employee or job applicant, an individual with a disability who can perform the essential functions of the job with or without reasonable accommodation.

## Compliance

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Students making requests for accommodation(s) must direct their requests to the Office of Student Accessibility Services (OSAS) at [OSAS Front Desk](#)

Employee requests for workplace related accommodations must direct their requests to the Office of Institutional Accessibility's IPCOE by contacting [Employee ADA](#).

### Grievance Procedure:

If a student disagrees with an OSAS decision or process related to accommodations or services, they have the right to submit a grievance by following the OSAS Grievance Procedure available through the Office of Student Accessibility Services under "[Resolving Concerns](#)".

Any individual who feels that they have experienced discrimination based on their disability, may file a formal complaint through [The Office of Equity, Equal Opportunity, and Title IX](#) at 213-821-8298 or email at [EEO-TIX](#)

### Discrimination, Harassment, and Retaliation

The University prohibits retaliation against any individual for the purpose of interfering with any right or privilege secured by University policy or law, or because the individual makes a good faith report or formal complaint, testifies, assists, participates, or refuses to participate in any manner in an investigation, proceeding, or hearing under the University Policy on Prohibited Discrimination, Harassment, and Retaliation. USC will not take any adverse action, retaliate, or discriminate against an eligible employee or student for requesting or utilizing a Service or Assistance Animal as permitted under this Policy. If an eligible employee or student believes an adverse action has been or is being taken against them for the use or need for a Service or Assistance Animal, the employee or student should contact the Office for Equity, Equal Opportunity, and Title IX by phone at (213) 821-8298 or email at [EEO-TIX](#).

### Violations of Policy

Any violation of rules or incidence of other violations may result, if appropriate, in a referral to the Office of Human Resources or the Office of Community Expectations for disciplinary action. While not a typical scenario, if a requested accommodation is not approved, the individual with a disability will have

the right to engage in an interactive process to determine if effective participation can occur with other appropriate accommodations.

### Relevant Forms and Tools

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Applicable forms are housed in [OSAS](#) and/or [OIA](#).

### Contacts

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Please direct any questions regarding this procedure to:

OFFICE	PHONE	EMAIL
Office of Institutional Accessibility and ADA Compliance (OIA)	Not Yet Applicable	<a href="mailto:accessibility@usc.edu">accessibility@usc.edu</a>
Office of Student Accessibility Services (OSAS)	213-740-0776	<a href="mailto:OSASFrontDesk@usc.edu">OSASFrontDesk@usc.edu</a>