

Disability Accommodations

Applies to: *Faculty (including part-time and visiting faculty), postdoctoral scholars, staff and students (including graduate/undergraduate student workers and graduate assistants) employed by University of Southern California and its subsidiaries (“USC employees”). This policy also applies job applicants, guests of the University and others who access the University’s program and services.*

1. POLICY

Issued: November 1, 2016

Last Revised: December 15, 2023

Last Reviewed: December 15, 2023

2. Policy Purpose

The purpose of this policy is to articulate the University’s commitment to access to our campus, programs, services, activities, employment opportunities, and employment privileges and benefits for individuals with disabilities. This document explains the University of Southern California’s policy for disability-related accommodations.

3. Scope and Application

The University follows all applicable state and federal laws regarding accommodation of individuals with disabilities, including Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 as amended (“ADA-AA”), the Fair Housing Act (“FHA”), and the California Fair Employment and Housing Act (“FEHA”). USC will make timely, good faith efforts to engage in the interactive process to determine effective reasonable accommodations for qualified individuals with disabilities and will provide reasonable accommodations to qualified individuals with disabilities consistent with its obligations under the law.

4. 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)	For students, reasonable accommodations include reasonable modifications of policies, practices, and procedures that make programs accessible for qualified students. For faculty, staff, and student employees, a reasonable accommodation is a change to the way a job is performed or to the work environment that allows a qualified person with a disability to perform the essential functions of their job. Accommodations may also allow equitable access to a physical or digital environment, a job application process, an employment privilege or benefit, or an activity hosted by USC. Reasonable accommodations are determined on an individualized basis and may not result in an undue administrative or financial burden. Permanent removal of an essential job function or

	fundamental alterations of a course or program are not considered reasonable accommodations.
Formal Request for Accommodation	Formal processes exist for students, employees, job applicants and guests requesting accommodations. Students should contact the Office of Student Accessible Services (“OSAS”) , employees and job applicants should contact the Office of Institutional Accessibility and ADA Compliance (“OIA”) , 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.

5. Policy Details

The University of Southern California (“USC”) is committed to the accessibility of our campus, programs, and activities for individuals with disabilities. This commitment extends not only to the physical campus environment, but also to the University’s digital portfolio. All units that purchase, use, and maintain digital assets are expected to do so in a way that allows individuals with disabilities equal access.

In many cases, because USC has established ongoing programs to provide accessible physical and digital environments, individuals with disabilities will not need to request accommodations or auxiliary aids and services. In those situations where individualized modifications are necessary, USC will make a good faith effort to provide reasonable accommodations or auxiliary aids and services for qualified individuals including, guests, prospective students, enrolled students, job applicants, and employees, including student workers, with a disability unless the accommodation requested would cause an undue hardship as defined by the ADA, pose a direct threat to health or safety, or fundamentally alter the nature of the academics, program, or event. A leave of absence may be a reasonable accommodation for qualified individuals with a disability in certain circumstances. Employees seeking leave or seeking to return to work following such a leave of absence should refer to USC’s Unpaid Accommodated Medical Leave Policy and USC’s Family Care and Medical Leave Policy.

USC's Associate Vice President for Institutional Accessibility and ADA Compliance is charged with ensuring regulatory compliance and oversight of all matters related to access and accommodation for individuals with disabilities, in collaboration with schools, divisions, governmental agencies, and advocacy groups supporting students, faculty, staff, and guests. This charge includes, but is not limited to:

- Oversight of disability-related support services that, among other things, include the determination and implementation of reasonable accommodations for students, employees, and guests
 - Oversight of disability-related educational resources
 - Development of policies and procedures for services, access, and accommodations
 - Coordination of educational programs and training on disability-related topics
 - Oversight of regulatory compliance activities
 - Evaluate efforts and implement changes to improve access for individuals with disabilities
 - Ongoing consultation with organizations representing individuals with disabilities
 - Enforcement of appropriate accommodations for qualified individuals with disabilities
 - Coordination with the Accessibility Advisory Committee, which exists to help identify the physical barriers experienced by students, faculty, staff, and guests with disabilities; to help prioritize barrier removal and to recommend cost and feasibility studies to arrive at the most cost-effective and efficient means of achieving barrier removal
 - Oversight of the university's open-ended ADA transition plan, which identifies needed barrier removal projects and places them on an implementation timeline
 - Coordination with Facilities Planning and Management as to barrier removal projects

School/Division Responsibilities

Each school or division must designate a person who is responsible for authorizing expenditures that may be required to facilitate reasonable accommodations and auxiliary aids and services needed by employees, job applicants, students, and members of the public participating in programs and services.

The cost of providing the reasonable accommodation or auxiliary aid or service is generally the responsibility of the department providing the employment, program, service, or activity, except in the case of providing general academic aids and adjustments for students with a disability, which is done through the [Office of Student Accessibility Services](#). [Facilities Planning and Management "FPM"](#) may also be consulted regarding larger structural changes and barrier removal projects, to best coordinate both the scope and timing of the work, and payment for such projects.)

Questions or concerns regarding obligations to accommodate students should be brought to the attention of the [Office of Student Accessibility Services](#). Questions or concerns regarding accommodations for faculty, staff, job applicants, and student workers should be brought to the attention of the [Interactive Process Center of Excellence](#) (see contact information below). In cases where a faculty member believes an approved academic adjustment would change the fundamental academic nature of a course, the faculty member should bring the matter to the Associate Vice Provost, who will first work with the faculty member in an attempt to resolve the concern. If the matter cannot be resolved by the parties, the Associate Vice Provost will elevate the matter to the Office of the Provost.

The Provost's determination is final.

Non-Retaliation or Discrimination Notice

USC will not take any adverse action, retaliate, or discriminate against a student, employee or job applicant on the basis of disability or for requesting a reasonable accommodation or an auxiliary aid or service. Students, employees, or job applicants who believe that they have been discriminated, harassed, or retaliated against because of a disability or request for reasonable accommodations should contact the [Office for Equity, Equal Opportunity, and Title IX](#), which is the university office formally charged with investigating such claims. In addition, individuals may also contact the [Office of Professionalism and Ethics](#), and/or the [Office of Culture, Ethics, and Compliance](#).

6. Procedures

[Disability Accommodation Procedures](#)

7. Forms

Applicable forms, if required, are housed in OSAS and/or OIA. For additional information, please visit:

If you are a student: [Office of Student Accessibility Services](#)

If you are a faculty or staff member: [The Office of Institutional Accessibility and ADA Compliance](#)

8. Responsibilities

POSITION or OFFICE	RESPONSIBILITIES
Office of Institutional Accessibility and ADA Compliance (OIA)	<ul style="list-style-type: none">A. Receives and evaluates employee accommodation requests, including student workers, as part of the interactive process.B. Approves workplace accommodations.C. Securely stores employee documentation, accommodation decisions, and related documents for employee accommodation requests.D. Manages the interactive process with employee, HR partner and supervisor(s)
Office of Student Accessibility Services (OSAS)	<ul style="list-style-type: none">A. Receives and evaluates student accommodation requests as part of the interactive process. Accommodation requests for student workers would contact OIA.B. Communicates approval status to students, and next steps when applicable, of accommodation requests.C. Communicates with relevant departments and/or University employees as needed, to aid in implementation of approved accommodations.D. Securely stores student documentation, accommodation decisions, and related documents for student accommodation requests.E. Provides access to accommodation letters via MyOSAS.
Student	<ul style="list-style-type: none">A. Formally applies for requested accommodations through the Office of Student Accessibility Services and engages in the interactive process.B. Provides documentation in support of requests from a treating provider for the condition in which accommodations are requested.C. Produces available accommodation letters and supplies them on a

	<p>semester basis to faculty members of courses in which students wish to use approved accommodations.</p> <p>D. If approved for <i>any</i> testing accommodation (including students approved for 1.5x) and enrolled in an in-person program at UPC, the student will schedule with the OSAS testing center through their MyOSAS portal, a minimum of one week ahead of any scheduled exam.</p> <p>E. If approved for <i>any</i> testing accommodation (including students approved for 1.5x) and enrolled in an online program and/or enrolled in a program located at the Health Science Campus (HSC) or the Alhambra campus, student will work with the faculty of record/Academic Department a minimum of one week ahead of any examination to inform faculty/department of their need to use their approved accommodation.</p>
Employee	<p>A. Formally applies for requested accommodations through the Office of Institutional Accessibility and ADA Compliance (OIA) and engages in the interactive process.</p> <p>B. Provides documentation, in a timely manner, in support of requests from a treating provider for the condition in which accommodations are requested.</p> <p>C. Engages in good faith with the Disability Accommodation Specialist, HR partner, and appropriate supervisor(s) as necessary for implementation of approved accommodations.</p>
Job Applicants	<p>A. Applicants with questions about access or requiring a reasonable accommodation for any part of the application or hiring process should contact USC Human Resources.</p>
Guests	<p>A. Request disability related accommodations and/or auxiliary aids and services from the department or unit hosting the program, service, or event they plan to attend in advance. If unable to readily identify the appropriate event sponsor, contacts the Office of Institutional Accessibility and ADA compliance for assistance.</p>
Departments/Units Housing Events	<p>A. Plan accessible programs, services, and events to the extent possible.</p> <p>B. Designate a point of contact to receive accommodation requests and set up accommodation vendors as needed.</p> <p>C. Consult with the Office of Institutional Accessibility and ADA Compliance or the Office of Student Accessibility Services as needed for guest accommodation requests.</p>
Human Resources Partner/Faculty Affairs Partner	<p>A. Recognize a request for an accommodation and refer the request to OIA IPCOE.</p> <p>B. Report accommodations to OIA IPCOE and share relevant documentation if an accommodation is provided by the school or division.</p> <p>C. Partner with Manager/Supervisors and/or OIA to participate in interactive process with employee as</p>

	D. Assist in the implementation and monitoring of approved accommodations.
Manager/Supervisor	A. Recognize a request for an accommodation. B. Refer employee to resources such as OIA and Human Resources Partners. C. Partner with Human Resources Partner or OIA to participate in interactive process with employee as necessary/requested. D. Partner with Human Resources or OIA to assist in the implementation and monitoring of approved employee accommodations.

9. Related Information

(i) related policies

- [Service and Assistance Animal Policy](#)
- [Unpaid Accommodated Medical Leave Policy](#)
- [Family and Medical Leave Act \(FMLA\)/California Family Rights Act \(CFRA\) Leave Policy](#)
- [Faculty Handbook](#) (leave information starting on page 26) (ii) any applicable legal or regulatory information (from Purpose section)
- [Prohibited Discrimination, Harassment, and Retaliation](#)
- [Section 504 of the Rehabilitation Act of 1973](#),
- The [Americans with Disabilities Act of 1990 as amended \(“ADA-AA”\)](#)
- The [Fair Housing Act \(“FHA”\)](#)
- Applicable state laws such as the [California Fair Employment and Housing Act \(“FEHA”\)](#)

10. Contacts

Please direct any questions regarding this policy to:

OFFICE	PHONE	EMAIL
The Office of Institutional Accessibility and ADA Compliance (OIA)	N/A	accessibility@usc.edu