Student Accessibility Services (SAS) – Student Handbook

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# General SAS Information

## Student Accessibility Services (SAS) Overview

Student Accessibility Services (SAS), a department within Student Life, serves a growing number of students with documented disabilities entering higher education. These students include undergraduate, graduate, and continuing education students. SAS helps students navigate the accommodations process and, ultimately, helps determine reasonable accommodations. The goal is to ensure equal access to all UNH students with disabilities.

### Student Accessibility Services (SAS) Mission

Student Accessibility Services (SAS) is committed to assuring that students with disabilities receive equitable, effective, and meaningful access to all campus programs, resources, and services. SAS is responsible for ensuring academic and housing accommodations. We recognize the diversity of abilities as a source of excellence, enrichment, and strength for all members of the university community. SAS facilitates and supports student growth and development toward empowerment, self-advocacy, and personal responsibility. These skills enable students to make informed decisions towards meeting or exceeding the standards/expectations both at UNH and beyond. Additionally, we are a source of information and referral, a resource and collaborative partner for the campus community, and a point of support and advocacy regarding access issues in general.

### Student Accessibility Services (SAS) Vision

Student Accessibility Services (SAS) seeks to create a welcoming, inclusive, universally accessible community where everyone is able to participate fully in the myriad aspects of the UNH experience.

### Student Life Mission Statement

Student Life is committed to facilitating student learning, holistic development, and overall well-being. Access, belonging, inclusion, and engagement are at the center of our work to foster a welcoming, safe, and caring campus community. Through student-centered, co-curricular programs, services, resources, and partnerships, we strive to enrich students’ education and support their personal growth to reach their potential at UNH and in the future.

### UNH Diversity Statement

The University of New Hampshire is committed to building and nurturing an environment of inclusive excellence where all students, faculty, and staff can thrive.  We also are committed to providing open and inclusive access for all alumni, volunteers, learners, employees, and visitors seeking to participate in our programs and activities.  We venture to sustain a campus environment that fosters mutual respect and understanding.  We believe diversity, equity, accessibility, and inclusion are foundational values inextricably linked to achieving our core educational mission and embrace the many characteristics of our community members that make them uniquely themselves.  Here, you belong and all are welcome.

## SAS Contact Information

### How to Schedule an Appointment

* Call (603) 862 - 2607 during regular business hours (8:00-4:30EST).
* Email our office at sas.office@unh.edu

When scheduling an appointment, please be prepared to provide the following:

* Your full name
* Contact information
* Reason for the appointment
* Best days and times to meet for your schedule

### Primary Mailing Address

227 Smith Hall, 2nd Floor

3 Garrison Avenue, Durham, NH 03824

(603) 862-2607 | Fax (603) 862-2616 | TTY Users: 7-1-1 or 800-735-2964 (Relay NH)

Hours of Operation - Monday-Friday, 8:00am-4:30pm

## Key Legal Requirements

The accommodation processes, rights and responsibilities, and other relevant guidance within SAS are guided by:

* The Americans with Disabilities Act (ADA); Americans with Disabilities Act Amendments Act (ADAAA)
* 504 of the Rehabilitation Act of 1973 (Section 504)
* Fair Housing Act (FHA)

### The Americans with Disabilities Act (ADA); Americans with Disabilities Act Amendments Act (ADAAA)

The ADA was initially enacted in 1990 as a comprehensive civil rights law to prohibit discrimination against people with disabilities. The intent was and continues to be today in the revision (ADAAA) to apply to all facets of public life. This includes institutes of higher education under Title II. This legislation provides a range of definitions, and guides much of the work of SAS.

[ADA Regulations and Standards](https://adata.org/ada-law-regulations-and-design-standards)

### 504 of the Rehabilitation Act of 1973 (Section 504)

Section 504 of the Rehabilitation Act was enacted in 1973. It was one of the first civil rights legislation that specifically applied to people with disabilities. It covers any program receiving federal funds, and, therefore, is applicable within higher education. In terms of impact related to provision of accommodations for students with disabilities in higher education, Section 504 and the ADA have similar requirements.

### Fair Housing Act (FHA)

The Fair Housing Act was enacted in 1968 as part of an expansion of the Civil Rights Act of 1964, and was subsequently amended in 1988. This act specifically, “protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing.”[[1]](#footnote-1) Disability discrimination is one of the key areas addressed within the act.

[The Fair Housing Act](https://www.justice.gov/crt/fair-housing-act-1)

## Privacy and Data Policies

### SAS FERPA Requirements

All student information shared with SAS is protected by the Family Educational Rights and Privacy Act (FERPA), Section 504 of PL.94-142, and the ADA-AA. In accordance with FERPA, SAS staff members will only share information about a student with a disability if a university official has a legitimate educational interest as determined by SAS.

If a student would like SAS to share information about their SAS record (this includes releasing the student record to the student), then this request must be made in writing through the Release of Information form. This form can be found on the SAS website, but is also made available directly through SAS. Please note that an ROI is only valid for a maximum of one year. Students can request the information be released for shorter periods of time, but no longer than one year. This is to protect student privacy.

SAS retains information related to the student record in Accommodate. As per institutional requirements, all student records will be deleted after seven years. If a student requests information past this timeline, SAS will no longer be able to share this information.

For more information about FERPA requirements please visit the [Office of the Registrar’s FERPA Webpage](https://www.unh.edu/registrar/student-records/ferpa) or the [Data Services FERPA Webpage](https://www.unh.edu/data-services/regulated-data/family-educational-rights-privacy-act-ferpa).

### Record Deletion

As per FERPA requirements, SAS deletes student records either:

* 7 years after last date of student enrollment, or
* After 7 years of inactivity with SAS

We highly recommend that upon graduation that you talk with SAS about any documentation or records that you feel you might need at a later point. For instance, to assist in requesting accommodations at another university or on a graduate entry exam. Once student records are deleted, SAS will no longer have access to documentation, accommodation letters, or additional information about your experiences in SAS.

## Email Policy

### Email through UNH Email Only

All emails with students should be conducted through the student and SAS staff member’s official UNH email accounts. This helps to ensure that SAS is communicating directly with the appropriate student. Communications can occur with non-UNH emails if the student is a prospective student but once a student has an official UNH email address, emails should be sent using that address.

### Confidential Information Shared Via Email

Confidential information should not be shared with SAS via email at any point. This includes, but is not limited to:

* Disability documentation
* Letters from medical/treatment providers
* IEPs or 504 Plans

If the student needs more information about how to share this information, please contact SAS. We can help navigate how to share the information safely.

### Documentation Submitted Via Email

Documentation shared via email cannot be accepted under any circumstances. If a student or provider shares documentation via email:

* The SAS staff member will not open the documentation
* The email will be deleted
* The student or provider (the student will be cc’ed on the email if responding to a provider submission) will be notified it was deleted and steps to take for appropriate documentation submission

If a student wishes to submit documentation, they can do so directly through their Accommodate account or they can contact SAS for more information. If the Accommodate upload link does not work, then SAS can make other arrangements. Students can also encourage their provider to complete the Provider Verification Form (this is generally the preferred method).

## Complaints and Grievances

Concerns about accommodations should be directed to SAS (603-862-2607 V; 800-735-2964 Relay NH). SAS can explore the concern to help ensure a timely resolution to the matter. This can include but is not limited to direct outreach to faculty or departments and directly working with other UNH offices that may be involved in the implementation of the accommodation (housing, parking, etc.).

Unresolved concerns and/or actions regarding SAS should be reported to ADA Compliance, Civil Rights and Equity Office, Section 504/ADA Compliance Officer (603-862-2930 V; 603-862-1527 TTY).

If you have observed, experienced or been provided information about an incident of sexual harassment, and, or sexual violence, discrimination, harassment, retaliation or bias, please report the incident by contacting the Civil Rights and Equity Office at (603) 862-2930 Voice / TTY Users 7-1-1 or submit a report via the **Incident Report Form (IRF)**. Anonymous reports may be submitted with the exception of Mandatory Reporters.

External resources. At any time during the process, a complainant may also choose to consult with one or more of these external agencies: [US Department of Education, Office for Civil Rights](https://www2.ed.gov/about/offices/list/ocr/index.html) and [U.S. Department of Housing and Urban Development](https://www.hud.gov/fairhousing).

# Accessing Services at SAS

The accommodation process is the process used to determine what accommodations are reasonable for an individual student. While all approved accommodations will necessarily vary, all students go through the interactive process. This process involves the following steps:

1. Register with SAS
2. Submit Documentation
3. Meet with SAS

These steps are flexible, but all of the steps are done in determining a student’s accommodations. This process allows SAS to explore the nature of the disability, the functional limitations, and the requested accommodations with the student directly. Please note, there may be situations in which all steps are not necessary. For instance, there could be situations related to housing accommodation requests that may differ.

## Who Can Receive Accommodations from SAS?

Critical to the work that SAS does is the provision of accommodations for students with disabilities. Before going too far into the details of this process, it is important to establish what is meant by “disability” and who is qualified to receive accommodations.

Disability is not something easily defined. There are legal definitions (as our office uses), as well as a range of other perspectives that have been presented over time. Understanding disability requires a complex consideration of a variety of factors. As stated within the WHO ICF Practical Manual, “The functioning of an individual in a specific domain reflects an interaction between the health condition and the contextual: environmental and personal factors. There is a complex, dynamic and often unpredictable relationship among these entities.”[[2]](#footnote-2) As highlighted, any understanding of disability needs to be centered within this dynamic and often changing interaction between an individual (identities, impairments, personal goals, strengths, etc.) and the environment (physical and digital space, culture of inclusivity, accessibility, barriers, practices, etc.).

While much of the work within SAS is focused on changing environments to ensure inclusion, the accommodation process falls within the legal realm of the ADA. Therefore, the primary definition used within our office as it relates to accommodations is the ADAAA definition of a disability (used by both Section 504 and HUD):

1. Disability - The term “[disability](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-1621453604-717106290&term_occur=999&term_src=title:42:chapter:126:section:12102)” means, with respect to an individual— 
   1. a physical or mental impairment that [substantially limits](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-1904506147-717106290&term_occur=999&term_src=title:42:chapter:126:section:12102) one or more major life activities of such individual;
   2. a record of such an impairment; or
   3. being regarded as having such an impairment (as described in paragraph (3)).[[3]](#footnote-3)

Importantly, the ADAAA did not change how this definition was worded, but it did clearly change the scope of how this definition should be interpreted. In particular, the interpretation of “substantially limits” was broadened to include a range of other potential life functions, and even this was viewed as examples and not an exhaustive list. Import to later distinctions between general accommodation processes and housing-only processes, the HUD also considers the ADAAA definition to be of primary importance in determining eligibility for accommodations.

The individual with a disability must also be a “qualified individual” to qualify for protections, and in the case of SAS services and accommodations. Qualified in this sense is meant to clarify that students must still be able to meet essential requirements with or without accommodations. As stated in the Title II regulations:

Qualified individual with a disability means an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.[[4]](#footnote-4)

Similar language can be found in Section 504, where a “qualified handicapped person” is defined as “(3) With respect to postsecondary and vocational education services, a handicapped person who meets the academic and technical standards requisite to admission or participation in the recipient's education program or activity;”[[5]](#footnote-5) As with ADA if a student is not qualified, then they are not protected.

As expected, exactly what this means in the context of higher education is on the one hand broad, but on the other hand context specific. There are university requirements, but when it comes to accommodations, the specific program, department, and course also make a difference. Whether or not a student can meet essential requirements must be determined based on context specific requirements of a course, program, department, or college. As will be stated through the document, all accommodations need to be made on a case-by-case basis as the result of an individualized assessment.

### Temporary Disabilities

SAS provides accommodations to students with temporary conditions. If a student has a temporary condition or is suspected of having a temporary condition, then the student should proceed through the interactive accommodations process.

If you had a recent accident that has resulted in the need for flexibility, then SAS recommends that:

* If there is immediate danger, contact 911.
* For acute injuries students should work with Health and Wellness to create a return and management plan (Dean’s Letter, SAS accommodations, Health Leave). Accommodations through SAS may be part of that return and management plan.

Please note that the process for temporary conditions is not the same as the [Dean’s Letter process](https://www.unh.edu/dean-of-students/processes-policies-protocols/absence-letters-dean-students). For students who have had an acute incident, a Dean’s Letter is often the first step in the process. Accommodations may still be necessary, so connections to both processes may be needed.

### Prospective Students and Applicants

SAS can help prospective students and applicants explore the accommodations process and possible services on campus. SAS most commonly helps prospective students and applicants explore:

* Steps in the accommodation process
* Accommodations offered at UNH
* Accommodations commonly provided to students with specific conditions
* Documentation requirements
* Campus supports such as the [Center for Academic Resources (CFAR)](https://www.unh.edu/cfar/), [Psychological and Counseling Services (PACS)](https://www.unh.edu/pacs/), the [Connors Writing Center](https://www.unh.edu/writing/cwc), and the [Mathematics Center (MaC)](https://ceps.unh.edu/mathematics-statistics/mathematics-center-mac).
* Commonly used Assistive Technology (AT) on campus

Prospective students and applicants who need accommodations within the admissions process should contact [Admissions](https://admissions.unh.edu/) directly. Admissions can help connect the student to the SAS Admissions Liaison to help facilitate any accommodation needs throughout the admissions process.

## What are Accommodations?

One of the primary functions of SAS is engaging students in the interactive accommodation process. ADA requires universities to provide reasonable accommodations. Accommodations are personalized supports that remove specific barriers with the goal of ensuring an individual can meet essential requirements or perform their job duties. The purpose of accommodations is not to change the standards or alter requirements, but instead provide different means of access to the individual.

Importantly, accommodations are determined on a case-by-case basis and are the result of an individualized assessment. Accommodation requests should be considered as individual requests and investigated as such. The result of this interactive process is student accommodations. Accommodations range in type and implementation depending on the nature and impact of the student’s condition. Most commonly accommodations include:

* Classroom Accommodations (e.g., notetaking assistance, technology access, personnel support)
* Exam Accommodations (e.g., additional time, alternative testing spaces, technology access)
* Course Accessibility Accommodations (e.g., accessible educational materials, captions, accessible spaces)
* Flexibility Exploration (e.g., attendance agreements, deadline agreements, participation)
* Policy Alterations (e.g., course substitutions, alternate course of study, ability to use a laptop for notetaking)
* Other Accommodations (e.g., housing, parking, transportation, dining)

Though there is a great deal of flexibility with the types of accommodations approved, accommodations can vary, but accommodations cannot fundamentally alter an essential requirement[[6]](#footnote-6). That is not to say that modifications should not be considered, but they need to be considered within the context of essential requirements.

### Auxiliary Aids and Services

Importantly, the ADA regulations also make a distinction between accommodations and auxiliary aids and services. The Title II regulations provide the following definition:

(1) Qualified interpreters on-site or through video remote interpreting (VRI) services; notetakers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing;

(2) Qualified readers; taped texts; audio recordings; Brailled materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;

(3) Acquisition or modification of equipment or devices; and

(4) Other similar services and actions.[[7]](#footnote-7)

This distinction is important. While universities are not responsible for providing personal services, they are responsible for providing students with auxiliary aids and services. It should be noted that many of these are related to accessibility requirements.

### Housing-Only Accommodations

SAS works with students to approve housing accommodations. Housing accommodations are applicable across all residence halls and UNH housing options. Housing accommodations range in type, but most commonly relate to:

* Placement accommodations
* Living environment accommodations
* Kitchen accommodations
* Bathroom accommodations
* Emotional Support Animals (ESAs)

Specific accommodations depend on the student need and housing availability.

SAS cannot approve housing requests for off-campus students. Off-campus students must engage in the interactive process established by the landlord of the off-campus living space.

#### How does the Fair Housing Act Define Accommodations?

It is important to distinguish general requests from housing-only requests. Though the ADA and Section 504 still apply when considering housing, housing accommodations need to be considered within the mandates of the Fair Housing Act (FHA).

The FHA calls for the provision of reasonable accommodations and modifications within housing. “A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have equal opportunity to use and enjoy a dwelling, including public and common use spaces.”[[8]](#footnote-8)

It should be noted that HUD also explicitly states that it can include modifications as well[[9]](#footnote-9). Generally, when they are considering modifications, it is within the context of modifying a living space with things like chair rails or accessible furniture. As with other laws relating to accommodations, modifications do not have to be provided if they constitute an undue burden or a fundamental alteration to a program. Overall, the goal is for the individual to have “full enjoyment” of the premises, and this might indicate the need for accommodations or modifications.

### Temporary Accommodations

Temporary accommodations are accommodations that are fully approved through SAS, but approved for a limited amount of time. These are accommodations that are provided to students with a temporary condition (for instance, a physical condition or a concussion). To receive temporary accommodations, students still go through all SAS processes as written. The only difference is the imposed timeframe limitation.

Student approved for temporary accommodations may apply for permanent accommodations at any time. Please note:

* SAS may request additional documentation to establish the condition is permanent
* SAS may request additional meetings to discuss permanent accommodations
* Accommodations approved temporarily are not automatically approved permanently, but instead dependent on the result of the interactive process

### Provisional Supports

Provisional supports should not be confused with temporary accommodations. Provisional supports are provided at the discretion of SAS, and SAS is under no obligation to provide these supports. Provisional supports are provided to students when students have provided incomplete documentation for full approval, but the documentation is complete enough to decide that supports are likely beneficial. An example of this is a student who submits an evaluation that does not meet the recency criteria for documentation review. In this case, SAS can provisionally approve an accommodation for the semester. This allows the student to have access to support, but also provides them with additional time to complete the documentation requirement. Please see below for more details about the provisional process.

## Key Responsibilities

### Student Responsibilities

Students not only play an active role in the accommodations process, but also play an active role in ensuring accommodations are implemented most effectively. As such, it is important for all students to be aware of their responsibilities throughout the process.

#### Student Responsibilities During the Accommodation Process

Students are responsible for:

* ***Self-identifying as a person with a disability to receive accommodations***  
  To receive accommodations, students must self-identify for services. Self-identification as it relates to SAS entails providing documentation, discussing functional needs, and discussing accommodations with SAS. If students do not self-identify or specifically request accommodations, then accommodations cannot be implemented.
* ***Completing any intake requirements in a timely manner (intake, documentation, and meeting with SAS)***  
  The student is responsible for completing all intake materials, submitting current and comprehensive documentation, and discussing any possible accommodations with SAS. Accommodations should be requested in a timely manner. Importantly, accommodations cannot be granted retroactively.
* ***Sending accommodation letters to faculty each semester***  
  Students are not under any obligation to use their approved accommodations. However, to utilize accommodations, students are required to send their accommodation letters to faculty each semester. Students can choose which professors will receive the letters as well as the specific approved accommodations included in each letter. It is ultimately a student decision as to what accommodations are shared and when, but as mentioned in other sections, accommodations cannot be granted retroactively, so proactive outreach is always encouraged.
* ***Sending accommodation letters or taking any additional steps in a timely manner***   
  Students are responsible for sending accommodation letters to faculty in a timely manner. Ideally, students should send their letters to faculty as early into the semester as possible. Students are not required to send letters early, but there are no retroactive accommodations. Additionally, accommodations could be denied for a particular instance if implementation is not reasonable.
* ***Reporting any issues regarding accommodations to SAS***  
  If students experience issues with accommodations and how accommodations are implemented, then students are responsible for reporting these issues to SAS. SAS can assist students with resolving any issues but need to be notified of the issue.
* ***Contacting SAS directly to update accommodations***   
  If the student needs to update their accommodations, the student is responsible for contacting SAS. SAS must approve any additional or revised accommodations. Depending on the request, this may or may not include sending updated documentation and/or meeting with SAS. SAS may request additional information as a means of supporting these updates.
* ***When changes or updates are made to an accommodation letter, re-sending the accommodation letters to faculty***If accommodations are changed or updated, students are responsible for sending their letters to faculty again to ensure faculty have the up-to-date accommodations. Even when faculty are aware or have advocated for the potential change, the letters must be sent again. At the time of approval, SAS can help students send these letters as needed.

#### Student Responsibilities in Accommodation Implementation

Students are responsible for:

* ***Meeting with faculty to discuss course accommodations***SAS strongly encourages all students to reach out directly to professors to talk with them about their accommodation needs. Ideally, this should happen when the accommodation letter is sent. Many faculty members can help in ways that might not be listed within an accommodation letter (e.g., additional course flexibility the student was not aware of, instructional strategies, additional course supports). Importantly, students need to speak with their professors to ensure this can happen. SAS encourages all students to have this conversation proactively, as this will help both students and faculty in any later conversations.
* ***Adhering to any accommodation specific guidelines (including relevant timelines)***Different accommodations have different guidelines associated with them. This could include specific timelines, student responsibilities, and steps to ensuring implementation. Students are responsible for meeting all responsibilities associated with their approved accommodations.
* ***Creating a course schedule that is effective for their needs***Students are responsible for working with academic advisors on creating a course schedule that best fits their needs. SAS does not have a course advising role, but many accommodations are only effectively implemented with careful planning. The student’s advisor will be an important person to help them create this schedule. As needed, SAS can help support that conversation to ensure student needs are met.
* ***Coordinating with other campus providers***Unlike in K-12 education, students are responsible for coordinating and accessing campus services. SAS can help students connect with other campus services (commonly, Center for Academic Resources (CFAR), Psychological and Counseling Services (PACS), and Health and Wellness), but students are ultimately responsible for following through with any of these providers.
* ***Reporting any formal grievances to the Civil Rights and Equity Office (CREO)***

#### Other Student Responsibilities

Students are responsible for:

* ***Meeting all academic and behavioral standards within UNH more generally, but also within individual courses***Accommodations cannot modify any essential requirements. All students are expected to meet both academic and behavioral standards as set forth within the UNH Community and within classrooms.
* ***Communicating with and responding to communication with SAS***  
  Students are responsible for communicating directly with SAS. This includes responding to communications from SAS related to accommodations and the accommodations process.
* ***Providing SAS with any necessary documentation updates***  
  Though not all students will need to update their documentation, there are situations in which updated documentation is necessary. In those circumstances, students are responsible for providing the additional documentation to SAS. Any delay in providing updated documentation could result in a delay in accommodation implementation.
* ***Providing updated contact information to SAS***  
  Students are responsible for providing updated contact information to SAS. This is important to ensure effective communication.

### SAS Responsibilities

Generally, within the accommodations process, SAS is responsible for:

* ***Helping students navigate the accommodations process (intake, documentation, meeting with SAS)***  
  SAS is responsible for helping students navigate through the accommodations process. This includes: assisting with the in-take process; safely storing, collecting, and reviewing student documentation; and meeting with students to discuss possible accommodations and the overall accommodations process. As necessary, this might also include additional meetings or meetings with other campus providers.
* ***Approving student accommodations***  
  SAS is responsible for approving student accommodation requests. This includes classroom, exam, housing, parking/transportation, and other accommodation requests. SAS is also responsible for helping explore flexibility requests. SAS is under no obligation to approve all accommodation requests. SAS is responsible for determining what accommodations are reasonable given the student’s functional needs and the educational context. Accommodations may be denied, and reasonable alternatives may be approved. It should also be noted that fundamental alternations of essential requirements cannot be approved.
* ***Completing the accommodations process in a timely manner***SAS is responsible for completing the accommodations process in a timely manner. SAS strives to complete the process quickly, but specific timelines are dependent on when the request was made, the nature of the request, student preparedness for the process (availability of appropriate documentation), and the time of year (SAS experiences a high volume of requests in August, September, and January).
* ***Maintaining a student record that includes safe storage of student documentation***SAS is responsible for maintaining a student record and storing that record safely. This includes adhering to any guidance provided through USNH or campus IT services.
* ***When necessary, helping students with the process for sending letters***  
  SAS can provide assistance to students with sending their accommodation letters. Students are ultimately responsible for sending the letters, but SAS can help students navigate this process. This includes guidance on the website, but students can also call the front desk for individual assistance.
* ***Coordinating with faculty, housing, parking, dining, or other campus providers to ensure accommodations are effectively implemented***  
  Some accommodations require more outreach and coordination from SAS. This more directly includes coordination with Housing/Residential Life as well as with Transportation Services, but this can also include coordination with faculty members. SAS helps ensure that approved accommodations are implemented and any issues with accommodations (faculty, students, or staff who have raised concerns) are addressed.
* ***Meeting with students for accommodation updates or changes***When students require changes or updates to their accommodation letters, SAS is responsible for meeting with the student to discuss the updates and changes. At that time, SAS will determine if additional documentation or additional meetings are necessary. This is determined based on an evaluation of each individual circumstance. For some cases, this might mean re-engaging in the accommodations process, but for requests that are already supported this might mean simply meeting and making the appropriate change to the accommodations. When changes are made, students are still responsible for re-sending their letters.
* ***Meeting with students about potential accommodation concerns***  
  When a student has a concern about their accommodations, SAS is responsible for meeting with the student to better understand what the situation is, and what potential solutions there might be. If the student has a formal grievance, SAS can assist the student in connecting with the Civil Rights and Equity Office (CREO) but is not directly involved in this aspect of the formal grievance process.
* ***Provide information and support to the UNH community related to accommodations, accessibility, and inclusion***SAS is also responsible for providing broader supports to the UNH community related to accommodations, accessibility, and inclusion. While SAS might not be directly implementing these practices across the community, SAS does seek to positively influence these areas.
* ***Continually update and revise processes and practices to reflect best practices within the field***SAS is responsible for continual updates and revisions to processes. At the very least, this should be re-evaluated yearly, but changes can be made as necessary. When possible, stakeholders should also be a part of the revision process.
* ***Provide updates to the UNH community about SAS changes***SAS is also responsible for providing the UNH community with updates related to SAS practices. As mentioned above, SAS can and should revise processes as necessary. This should be communicated to the relevant stakeholders.
* ***Consulting with and learning from the UNH community to understand the needs of community members***SAS is also responsible for reaching out to the community to learn from the experiences of all relevant stakeholders.

# The Interactive Accommodations Process

The interactive accommodation process is the process used to determine what accommodations are reasonable for an individual student. While all approved accommodations will necessarily vary, all students who are approved for accommodations go through the interactive process. This process involves the following steps:

1. Register with SAS
2. Submit Documentation
3. Meet with SAS

These steps are flexible, but all of the steps are done in determining a student’s accommodations. This process allows SAS to explore the nature of the disability, the functional limitations, and the requested accommodations with the student directly. Please note, there may be situations in which all steps are not necessary. For instance, there could be situations related to housing accommodation requests that may differ.

## A Note about Accommodate

Accommodate is the accommodation management system used by SAS. This is the system that students will use to register, submit documentation, view and sign SAS letters, request modifications, and much more. This system as well as a student guide and supportive videos are available through the SAS Website.

## Step 1: Student Registration

The first step in the accommodation process is student registration. Students are required to self-identify with SAS to receive accommodations. Students who do not self-identify are not eligible for accommodations. While SAS is more than happy to answer any questions or to schedule an appointment to meet with one of our staff, the formal accommodation process is not initiated until the student registers with our office.

To register students must complete the “Student Accommodation Request” form. This form is available through the [SAS website](https://www.unh.edu/studentaccessibility). The purpose of the intake form is to allow the student the opportunity to self-identify with us, as well as provide initial information on the disability/condition that will assist SAS in guiding the student down the proper accommodation route. The intake form asks for some basic information such as:

* What the disability/condition is
* What the impact is on you as a student
* What kind of accommodations are being requested
* Information about past accommodations

Once the intake form is submitted, the student will receive an auto-generated registration confirmation email from our office. This email will include guidance on how to proceed with gathering and submitting documentation for the second step of the process. At this point, the student is on step 2: documentation submission.

## Step 2: Submit Documentation

An important part of determining the nature and impact of the student’s condition is documentation. While a student can speak to and is required to speak to their condition via a self-report in the meeting with SAS, it is also important to gain additional perspective on the nature and impact of the condition. Ultimately, SAS must determine if the person is a qualified individual with a disability and whether a condition “substantially limits one or more major life activity”[[10]](#footnote-10). This is where documentation comes into play.

### Purpose and Use of Documentation

Documentation plays an important role in the interactive accommodations process. While there are many approaches to documentation and equally many opinions on the role it should play, generally documentation helps establish the need for accommodations and can help confirm the potential functional impact of the student’s condition as it relates to the student’s experience in higher education.

Documentation is external confirmation of a student’s condition. This information helps inform SAS about the nature of the disability and helps make the connection to how the accommodations will help address barriers a student might face. Depending on the specific process, housing-only vs other requests, the specific documentation needed varies.

### General Documentation

There are a number of different potential sources of documentation. SAS considers general documentation in the following ways:

* Primary sources – Primary sources are necessary in determining accommodations
  + Student self-report
  + Provider support letters
* Secondary sources – Secondary sources are supportive in determining accommodations, but alone are not sufficient
  + Third party reports (parents, friends, faculty, staff, etc.)
  + Individualized Education Programs (IEPs)
  + 504 Plans
  + Previous accommodation letters

It should be noted that currently an IEP or 504 Plan is not considered sufficient to automatically establish the existence of a disability. An IEP or a 504 plan could meet the necessary criteria as later outlined, but it does not necessarily do so. However, in addressing testing within private entities, the Title III regulations notes:

When considering requests for modifications, accommodations, or auxiliary aids or services, the entity gives considerable weight to documentation of past modifications, accommodations, or auxiliary aids or services received in similar testing situations, as well as such modifications, accommodations, or related aids and services provided in response to an Individualized Education Program (IEP) provided under the Individuals with Disabilities Education Act or a plan describing services provided pursuant to section 504 of the Rehabilitation Act of 1973, as amended (often referred to as a Section 504 Plan).[[11]](#footnote-11)

Importantly, these documents should be given “considerable weight” as they do represent previous engagement in a similar process.

#### Process for Submitting General Documentation (All Besides Housing Only)

##### Option 1: Provider Verification Form

The preferred pathway for submitting documentation will be through a provider verification form. This form is created within Microsoft Forms to ensure that it is FERPA compliant. The form consists of a series of questions that a provider can answer to help provide:

* Information about the provider
* Student information
* Diagnosis information
* Functional impact of the student’s condition (physical, sensory, cognitive, emotional and/or behavioral)
* Recommended accommodations

[SAS Accommodation Request - Provider Verification Form](https://forms.office.com/r/5ZTAM4WZCj)

Please note that the form does not allow attachments. All additional assessment information should be shared with the student, and the student can share it directly with SAS through Accommodate. The provider can also fax these documents as well.

##### Option 2: Submission of Support Letters, assessments, or historical documents (Criteria Approach)

The reality is that not all students have an active provider. For instance, some students with Learning Disabilities might have seen a provider for a neuropsychological evaluation within 5 years, but not been in contact with them since that point. In this case, the student would have access to a neuropsychological report, but not necessarily the provider themselves. Students in these situations still submit the documentation for SAS review.

The key difference between the student process for pathway 2 is the level of expertise the student is required to have regarding the review criteria. Whereas the provider is more responsible for the criteria in pathway 2, the student is solely responsible for the criteria in this pathway. Students are therefore more reliant on doing a self-check of their own documentation. This is important because the documentation might shift in terms of content depending on for whom it was written.

#### Review Criteria for General Documentation

As indicated, this pathway involves reviewing documentation through a series of review criteria. The goal is to ensure consistency across reviewers and students. Review criteria, which are based on the ETS documentation guidelines[[12]](#footnote-12), are as follows:

* Basic Criteria, documentation should:
  + Be on official letterhead, dated, typed, and in English
  + Be written by a licensed provider
  + Must come from a professional with an existing relationship to the student
  + Include information about the student diagnosis
  + Include any current, objective assessment data to support the diagnosis
  + Detail the functional limitations, including the severity of said limitations
  + Discuss any relevant accommodation history
  + Detail the connection between the functional implications and the accommodations being requested by the student
* Recency Criteria
  + ADHD, LD, ASD, ID - within 5 years
  + Psychological, TBI - within 1 year
  + Health, Sensory - variable depending on condition permanence

Again, the eventual goal is that SAS will be able to answer all three key questions as documented below.

It should also be noted that these criteria are also included within the provider verification form, where they are asked more directly.

### Housing-Only documentation

Documentation standards as outlined by HUD are different than the documentation standards within the ADA and Section 504. SAS may request documentation for housing requests to help confirm the student’s condition. Within their assistance animal guidance, HUD provides a list of sources that would qualify as documentation:

* A determination of disability from a federal, state, or local government agency.
* Receipt of disability benefits or services (Social Security Disability Income (SSDI)), Medicare or Supplemental Security Income (SSI) for a person under age 65, veterans’ disability benefits, services from a vocational rehabilitation agency, or disability benefits or services from another federal, state, or local agency.
* Eligibility for housing assistance or a housing voucher received because of disability.
* Information confirming disability from a health care professional –e.g., physician, optometrist, psychiatrist, psychologist, physician’s assistant, nurse practitioner, or nurse.
* Documentation purchased from the internet generally does not meet documentation standards

#### Process for Housing-Only Requests

While this accommodation pathway in many ways mirrors the criteria pathway, there are also some key differences should students only request housing accommodations. In particular, there is the addition of the observable condition caveat and the more direct interaction between SAS and Housing.

As with any other accommodation process, this pathway begins once a student requests accommodations. Students make the request through Accommodate and submit documentation, which is then reviewed by SAS as part of the overall accommodation process.

#### Housing Only Review Criteria

Documentation for housing only requests is more limited than for requests for other types of accommodations. Most notably is that the process should begin with the assumption that if the condition is observable and easily accommodated, then additional documentation should not be requested. Documentation should only be requested when the condition or impact of the condition is not directly observable.

In the scenario when documentation is needed, housing only documentation:

* Basic Criteria. Housing only documentation should:
  + Be on official letterhead, dated, typed, and in English
  + Must come from a professional with an existing relationship to the student
  + Provide information about the specific functional impacts of the condition
  + Detail the relationship between the condition and the accommodation request
    - Regarding Emotional Support Animals (ESA) this can also include information on work the animal does, tasks performed, and type of assistance
* Recency Criteria
  + ADHD, LD, ASD, ID - within 5 years
  + Psychological, TBI - within 1 year
  + Health, Sensory - variable depending on condition permanence

## Step 3: Meet with SAS

SAS meets with students for a variety of reasons. Of relevance to this guidance are two types of meetings:

* Exploration of Accommodations
* Determination of Accommodations

During both meetings, the process for accommodations is directly discussed and, depending on where students are in the request process, accommodations and other supports are discussed.

### Preparing for the Meeting with SAS

#### Make Sure You Are Registered with SAS

Students do not have to be registered with SAS to schedule a meeting. However, if you are planning to request accommodations in the meeting, you will need to be registered in our system. If you have not completed the registration process, then you can learn more about Step 1: Register with SAS.

#### Submit Any Updated Documentation

SAS will meet with students whether or not they have submitted documentation, but documentation is required to approve accommodations. If you can submit documentation prior to the meeting, this will help ensure accommodations can be approved in a timely manner. If you have not completed the documentation process, then you can learn more about Step 2: Submit Documentation.

#### Be Prepared to Discuss Your Condition and How It Impacts You

During the meeting you will talk with the learning specialist about your condition. This includes talking about your diagnosis or diagnoses, as well as how your conditions impact you. SAS will ask you questions about impacts both in the classroom and outside of the classroom. We do not need a full record of all the impacts, but we do need to make the connection between your condition and the accommodations you are requesting.

#### Be Prepared to Discuss the Accommodations You Are Requesting

During the meeting you will also talk with the learning specialist about the accommodations you are requesting. You can talk more about the specific accommodations you would like, but you can also ask the learning specialist about other accommodations that are available. The learning specialist can help you explore how your needs could be met through accommodations, but they will also talk with you about other resources on campus that may assist you as well.

# Accommodation Implementation

Accommodations are primarily implemented by faculty, housing, parking, or other relevant campus providers. While SAS does assist these individuals in providing the accommodations, SAS does not always directly implement accommodations. Processes for implementation vary depending on the type of accommodations.

## Academic Accommodations

Academic accommodations are primarily communicated by students to faculty through accommodation letters. While some accommodations may require direct outreach by SAS (for instance, when students need accessible materials), students are responsible for notifying their faculty about their accommodations as early as possible.

### What are Accommodation Letters?

The primary way that accommodations are communicated to faculty is through accommodation letters. Accommodation letters are templated letters that are sent by students to faculty through Accommodate. These letters contain information about your SAS approved accommodations, as well as general information faculty should be aware of.

It is important to note that disability specific information is not included in accommodation letters. Students are ***not required*** to share disability specific information with faculty to receive accommodations. Students should talk directly with SAS about guidance around self-advocacy.

### Activating Accommodation Letters through a Semester Request

To receive accommodations in courses, students are responsible for completing a “Semester Request” within Accommodate. Students should complete a “Semester Request” at the beginning of each semester, and should be sent as close to the beginning of each semester as possible (you can send letters later, but there are no retroactive accommodations and exam accommodations should be shared at least 1 week in advance of the exam)

If a student changes courses or switches their course section, then they should complete a new semester request with the revised courses included.

Please note that for some accommodations (captions, accessible materials, interpreters, etc.) SAS may reach out proactively to faculty. This is done when an accommodation requires proactive planning and additional supports from SAS. When this is the case, the student is still responsible for sending their accommodation letters to faculty.

## Housing Accommodations

Housing is available at both the Durham and CPS Manchester campuses. All students who would like housing accommodations are required to apply for housing and adhere to all housing-related deadlines. Part of this process can include applying for housing accommodations.

SAS assists in the interactive accommodation process for housing accommodations. Housing accommodations can be requested at any time, but due to limited availability, it is highly encouraged to apply for accommodations by the priority housing deadlines. The chances of an accommodation being able to be met are greatly increased if a student completes the accommodation approval process by the priority deadlines.

For more information about housing accommodations available, please visit [SAS Accommodations Guide: Procedures and Practices](https://mycourses.unh.edu/courses/75652).

### UNH Durham Housing Accommodations

Housing accommodations may be requested at UNH Durham. Housing is provided through [UNH Housing](https://www.unh.edu/housing/) and SAS works closely with UNH Housing to ensure that accommodation needs are met. UNH Durham students who wish to request housing accommodations may contact SAS directly, and we can help you through the accommodation process.

Please note, UNH Durham students are highly encouraged to meet [priority deadlines for accommodations set by UNH Housing](https://www.unh.edu/housing/accommodations).

### CPS Manchester Housing Accommodations

Housing accommodations may be requested at CPS Manchester. Housing is provided through Southern New Hampshire University (SNHU), and as such SAS works closely with [SNHU Residence Life](https://www.snhu.edu/student-experience/campus-experience/campus-housing) as well as their [Campus Accessibility Center](https://www.snhu.edu/student-experience/campus-experience/student-services/campus-accessibility-center) to ensure that housing accommodation needs can be met. CPS Manchester students who wish to request housing accommodations may contact SAS directly, and we can help you through the accommodation process.

Please note, CPS Manchester students are highly encouraged to meet priority deadlines set by SNHU Residence Life.

## Dining Accommodations

While UNH is committed to providing a wide range of safe and healthy options for students, there may be circumstances where students require additional dining supports. Dining accommodations are approved through the interactive accommodations process and are approved based on the student’s specific condition.

For more information about Dining Accommodations, please visit: [SAS Accommodations Guide: Procedures and Practices](https://mycourses.unh.edu/courses/75652).

For more information on navigating inclusive options at UNH Durham, please visit the [UNH Dining – Special Concerns page.](https://www.unh.edu/dining/nutrition/special-concerns)

## Parking and Transportation Accommodations

Students approved for parking and transportation accommodations will be connected directly to the parking office. If a student is approved for accessible transportation, then the student is responsible for following-up to create a schedule with the Access Van.

For more information about Parking and Transportation Accommodations, please visit: [SAS Accommodations Guide: Procedures and Practices](https://mycourses.unh.edu/courses/75652).

# Additional Information

## Key Definitions

### Accessibility

Accessibility refers to the degree to which materials, spaces, or experiences are designed to allow for an individual to participate and contribute equitably. Something is considered accessible if it allows for individuals to independently “acquire the same information, engage in the same interactions, and enjoy the same services”[[13]](#footnote-13). This applies to all aspects of the student experience across university life, including classroom and non-classroom experiences, physical and digital spaces, and within educational and promotional materials. Accessibility should be considered at all stages of the design process using Universal Design frameworks, accessibility standards, and relevant legislation.

### Accommodations

Accommodations are personalized supports that remove specific barriers with the goal of ensuring an individual can meet essential requirements or perform their job duties. Accommodations are determined on a case-by-case basis through an interactive process. The purpose of accommodations is not to change the standards or alter requirements, but instead provide different means of access to the individual.

### Disability

Understanding disability requires a complex consideration of a variety of factors. As stated within the WHO ICF Practical Manual, “The functioning of an individual in a specific domain reflects an interaction between the health condition and the contextual: environmental and personal factors. There is a complex, dynamic and often unpredictable relationship among these entities.”[[14]](#footnote-14) As highlighted, any understanding of disability needs to be centered within this dynamic and often changing interaction between an individual (identities, impairments, personal goals, strengths, etc.) and the environment (physical and digital space, culture of inclusivity, accessibility, barriers, practices, etc.).

Related to the determination of accommodations, the definition of disability is outlined within the ADAAA: “The term “disability” means, with respect to an individual— a physical or mental impairment that substantially limits one or more major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment (as described in paragraph (3)).”[[15]](#footnote-15)

### Diversity

Refers to the myriad ways in which an individual differs and the impact these differences may have on the given experience of an individual. It refers to the wide range of intersectional identities including, but not limited to: race, ethnicity, gender, age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, language, veteran status, size, etc. It also involves different ideas, perspectives and values.

### Inclusion

The ongoing, iterative, and constructive process of creating an environment in which an individual or group is welcomed, respected, supported and valued as a fully participating member. While diversity is an important aspect of inclusion, diversity alone is not indicative of an inclusive environment. Rather, inclusion is an active and intentional process of reflection, change, and improvement with the goal of ensuring all individuals feel a sense of belonging.

### Qualified Individual with a Disability

Qualified individual with a disability means an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.[[16]](#footnote-16)

## Disability Organizations

### Disability Rights Center - NH

64 North Main Street, Suite 2, 3rd Floor Concord, NH 03301-4913

603-228-0432 (V) — 800-834-1721 (FREE V/TTY) — 603-225-2077 (FAX)

Email: advocacy@drcnh.org

### Office for Civil Rights, Boston Office

U.S. Department of Education 5 Post Office Square, 8th Floor

Boston, MA 02109-4557

617-289-0111 (V) — 617-223-9695 (TDD) — 617-289-0150 (FAX)

Email: OCR.Boston@ed.gov Website: http://www.ed.gov/ocr

### U. S. Department of Justice

950 Pennsylvania Ave., NW

Civil Rights Division, Disability Rights Section—NYA Washington, DC 20530

800-514-0301 (V) — 800-514-0383 (TTY)

Website: http://www.usdoj.gov/

1. https://www.hud.gov/program\_offices/fair\_housing\_equal\_opp/fair\_housing\_act\_overview [↑](#footnote-ref-1)
2. https://www.who.int/classifications/drafticfpracticalmanual2.pdf?ua=1 [↑](#footnote-ref-2)
3. https://www.law.cornell.edu/uscode/text/42/12102 [↑](#footnote-ref-3)
4. https://www.ada.gov/regs2010/titleII\_2010/titleII\_2010\_regulations.htm [↑](#footnote-ref-4)
5. https://www.law.cornell.edu/cfr/text/34/104.3 [↑](#footnote-ref-5)
6. https://www.ada.gov/regs2010/titleII\_2010/titleII\_2010\_regulations.htm [↑](#footnote-ref-6)
7. https://www.ada.gov/regs2010/titleII\_2010/titleII\_2010\_regulations.htm [↑](#footnote-ref-7)
8. https://www.hud.gov/sites/dfiles/PA/documents/HUDAsstAnimalNC1-28-2020.pdf [↑](#footnote-ref-8)
9. https://www.hud.gov/program\_offices/fair\_housing\_equal\_opp/reasonable\_accommodations\_and\_modifications [↑](#footnote-ref-9)
10. https://www.law.cornell.edu/uscode/text/42/12102 [↑](#footnote-ref-10)
11. https://www.ada.gov/regs2010/titleIII\_2010/titleIII\_2010\_regulations.htm [↑](#footnote-ref-11)
12. https://www.ets.org/disabilities/documentation/ [↑](#footnote-ref-12)
13. https://www.ada.gov/kindle\_ltr\_eddoj.htm [↑](#footnote-ref-13)
14. https://www.who.int/classifications/drafticfpracticalmanual2.pdf?ua=1 [↑](#footnote-ref-14)
15. https://www.law.cornell.edu/uscode/text/42/12102 [↑](#footnote-ref-15)
16. https://www.ada.gov/regs2010/titleII\_2010/titleII\_2010\_regulations.htm [↑](#footnote-ref-16)