# STUDENT ACADEMIC ACCOMMODATION GUIDELINES

## University of Waterloo

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**Related Policies, Guidelines & Procedures:**
- Policy 36 – Dispute Resolution for University Support Staff
- Policy 46 – Information Management
- Policy 58 - Accessibility
- Policy 70 – Student Petitions and Grievances
- Guidelines for Managing Student Information for Faculties, Academic Departments and Schools
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PURPOSE AND SCOPE

The University of Waterloo is committed to upholding the rights of persons with disabilities and creating accessible and inclusive learning environments for all. In order to do so, many are seeking guidance on how best to support students with disabilities and offer accommodations that maintain academic standards and integrity. Sometimes, individuals may be uncertain about their role in the accommodation process or are unclear on how to resolve an accommodation dispute should it arise. This document provides guidance on roles and responsibilities in the accommodation process for students, course instructors/faculty members, and staff within the framework of Provincial legislation and the University of Waterloo’s existing principles and policies. The purposes of the student academic accommodation guidelines are to:

- Provide guidance on the roles and responsibilities of students, course instructors/faculty members, staff, and administrators in the accommodation process of students with disabilities.
- Create an accommodation process that fosters a climate of understanding, dignity, and confidentiality.
- Enable students with disabilities to demonstrate their ability to fulfill the essential requirements of their program by ensuring they receive reasonable and appropriate academic accommodations in accordance with all applicable legislation, including the Ontario Human Rights Code (OHRC) and the Accessibility of Ontarians with Disabilities Act (AODA), as well as guidance provided by the Ontario Human Rights Commission.

These guidelines apply to all academic requirements, including but not limited to:

- The requirements of a course offered on campus or online.
- The requirements for participating in the exploration and pursuit of work integrated learning.
- Milestones or non-course degree requirements (graduate or undergraduate).

More specifically, the guidelines apply to:

- The instruction and delivery of content within the learning environment/context.
- The method of evaluating and assessing a student within the learning environment/context.
- The activities required for participating in courses or other academic requirements.
- The learning spaces where education or training is provided, which can include lecture halls, classrooms, studios, laboratories, clinics, fieldwork locations, etc.

Students with disabilities require equitable opportunities to access and benefit from their education and receive reasonable academic accommodations. At the postsecondary level, appropriate accommodations provide students with the opportunity to meet the academic standards of their various courses and programs, particularly the knowledge and skills necessary to demonstrate having achieved the required learning objectives (i.e., essential requirements) (Refer to Appendix A: Reasonable Accommodations,
Essential Requirements, and Undue Hardship). The student academic accommodation guidelines are designed to support the University of Waterloo in providing academic accommodations and supports to students with disabilities.

Within these guidelines, disability is defined as per the OHRC, where disability covers a broad range and degree of conditions that can be permanent, temporary, sporadic, and suspected, including, but not limited to physical disabilities, learning disabilities, developmental disabilities, mental health disabilities. The definition includes disabling medical conditions and the physical, emotional, and psychological effects of a trauma (e.g., sexual violence). This definition is constantly evolving as there are changes in human rights law. As such, the meaning of disability should be interpreted broadly, and should remain flexible and encompassing of new and emerging disabilities including those where a precise diagnosis is unclear or not yet determined (Refer to Appendix B: Documentation Requirements).

GUIDELINES FOR STUDENT ACADEMIC ACCOMMODATIONS

This section outlines three guidelines for designing, facilitating, and supporting student academic accommodations. Each will be defined and will include information on the roles and responsibilities of faculty, staff, and students.

1: ESTABLISHING ACCOMMODATION PLANS

The accommodation process works most effectively when faculty members, staff, and students are informed about (and embrace) their roles and responsibilities, as each stakeholder has an important role to play in ensuring accommodations are appropriately designed, facilitated, and upheld.

Basic Process for Establishing Accommodations

1. Student will submit an application to AccessAbility Services to make the nature of their disability and/or their needs known, as well as submit any supporting medical documentation (Refer to Appendix B: Documentation Requirements). To apply, students will complete the online application from AccessAbility Services’ website: https://uwaterloo.ca/accessability-services/. Students are encouraged to contact the office for assistance with completing the application.

2. AccessAbility Services staff will assess medical documentation to determine disability status and eligibility for academic accommodations.

3. Student will be invited to book an appointment with an AccessAbility Services Accommodation Consultant to discuss their needs, and to finalize their individualized accommodation plan.

4. Student will request their approved classroom, alternate format, and testing accommodations, for each course, using AccessAbility Services’ online system. Students requiring graduate milestone accommodations or cooperative education accommodations will book an appointment with an Accommodation Consultant to request their approved accommodations.
within that context.

5. AccessAbility Services will communicate the approved accommodation plan to each course instructor via the Faculty Notification Letter by Email. Graduate milestone accommodations, or cooperative education accommodations will be communicated via email to the relevant stakeholder.

6. The course instructor/faculty member will enable the accommodation, and will participate in the accommodation process as required, to the point of undue hardship. The course instructor/faculty member will contact AccessAbility Services if they have questions or concerns with the accommodation plan which may be amended as needed, in consultation with the student.

**Responsibility of AccessAbility Services**

AccessAbility Services is the University’s centralized office for managing academic accommodations for students with disabilities. The Office collaborates with the University of Waterloo community to support equitable access to education by designing academic accommodation plans, facilitating the implementation of accommodations, and offering accommodation supports that increase student capacity for personal success (in some instances, academic accommodations are facilitated or supported by other campus units, including the Library, Writing and Communication Centre, etc.). In serving in this function, AccessAbility Services will:

1. Receive all referrals for academic accommodations for students with diagnosed or suspected disabilities.
2. Collect, vet and maintain medical documentation in a confidential and secure manner (in accordance with privacy legislation and the University’s retention policies).
3. Assess medical documentation to determine disability status and eligibility for academic accommodations.
4. Request additional documentation from students if the determination of a disability is inconclusive, if the documentation does not support the assistance or accommodation(s) requested, or if the documentation is not current (Refer to Appendix B: Documentation Requirements).
5. Meet with the student to create an appropriate academic accommodation plan that meets their disability-based needs, and that maintains academic integrity. In some instances, AccessAbility Services may complete the student’s academic accommodation plan in consultation with the student and relevant members from the academic unit (e.g., academic supervisor, graduate program coordinator, etc.). This plan will be reviewed and evaluated when needed, with revisions/changes shared as required.
6. Communicate the accommodation plan to relevant stakeholders. Classroom and testing accommodations will be communicated to course instructor(s) / department(s) via the Faculty
Notification Letter sent by email. Graduate milestone accommodations will be communicated by email to relevant members within the academic unit (e.g., academic supervisor, department Chair, etc.). Accommodations related to cooperative education will be communicated by email to relevant individuals within Cooperative Education and the Centre for Career Action, or to the student directly to present as appropriate.

7. Facilitate academic accommodations and supports for students with disabilities, including the coordination of requests for, and assist in the provision of, academic accommodations which may involve consultation or engagement with external service providers.

8. Collaborate with course instructors/faculty members, or academic administrators to determine appropriate and/or alternate accommodations when required, in order to maintain academic integrity.

9. Maintain confidentiality to the greatest extent possible when providing academic accommodation(s) and related support services to students. Students with disabilities may request and authorize that AccessAbility Services share relevant information from their files to assist in obtaining access, accommodation, or service.

10. Provide direction to course instructors/faculty members, or academic administrators regarding whether there is a duty to accommodate a student with a disability for the purposes of retroactive accommodations, petitions, or other exemptions on the grounds of disability.

**Responsibility of Students**

Academic accommodations and supports remove unnecessary barriers and enable students to build capacity for personal success. The University encourages students with known or suspected disabilities to consider whether academic accommodations are required to enable them to meaningfully participate in their academic program. Academic accommodation plans are individualized and tailored to the unique needs of students within their academic environment. As such, students play a critical role in the development and facilitation of an accommodation plan and their participation and engagement in the process and plan is critical. As such, students requiring academic accommodations will:

1. Apply to register with AccessAbility Services once they have accepted their offer of admission from the University of Waterloo, or as soon as they become aware of (or suspect) a disability, to make the nature of their disability and/or their needs known.

2. Provide appropriate documentation of disability to AccessAbility Services to be considered for assistance or reasonable accommodation(s) (Refer to Appendix B: Documentation Requirements). Students who suspect they have a disability that is affecting their academic performance, but do not have medical documentation to support a disability, are encouraged to apply to AccessAbility Services to explore what interim accommodations may be available.

3. Meet with an AccessAbility Services’ Accommodation Consultant to provide input into the development of an academic accommodation plan. The academic accommodation plan is
designed to meet disability-based needs while maintaining academic integrity.

4. Learn and follow the University’s Student Academic Accommodation Guidelines, as well as AccessAbility Services’ procedures for the provision of academic accommodations and services.

5. Select and request classroom, alternate format, and/or testing accommodations at the start of each academic term (or when registering for the course) using AccessAbility Services’ online system both to trigger the Faculty Notification Letter and to request accommodation services from AccessAbility Services. Information about requesting and managing accommodations is available on the AccessAbility Services website. All individual tests need to be booked using the online system five business days prior to the test, or by the ‘Drop, penalty 1 period’ date, whichever comes first (https://uwaterloo.ca/quest/undergraduate-students/impor-
tant-dates/2017-2018). Final exams need to be scheduled using AccessAbility Services’ online system as soon as the exam schedule is made available. Students requiring graduate milestone accommodations or cooperative education accommodations will book an appointment with their Accommodation Consultant to request their approved accommodations within that context. Students who request their accommodations after a deadline, or late in the term, may have their needs considered via the retroactive accommodation process.

6. Contact AccessAbility Services if changes or problems arise related to disability or accommodations.

7. Seek accommodations and services offered by the University of Waterloo first, followed by those covered through available bursaries or funding programs, before exploring external accommodations (when applicable).

8. Understand that students assume the risks and consequences associated with going against medical advice provided by their health provider and/or recommendations of AccessAbility Services (i.e., the accommodation plan).

9. Actively participate and engage in the accommodation planning and facilitation process.

Responsibility of Course Instructors/Faculty Members

Course instructors/faculty members play a vital role in shaping a student’s university experience. An important relationship for many students while at university is the one established between themselves and their course instructors/faculty members. This relationship can be the key to success for many students, especially those whose academic success relies on good communication with their course instructors/faculty members. Course instructors/faculty members are expected to act in accordance with human rights legislation pertaining to the duty to accommodate students with disabilities. As such, course instructors/faculty members will:

1. Foster an equitable learning environment where respect for the dignity of the person with disabilities is upheld, and respect for confidentiality is realized.

2. Support that AccessAbility Services determines whether a student requires disability-based
3. Uphold a student’s academic accommodation plan, as determined by AccessAbility Services, to the point of undue hardship. To facilitate this, course instructors/faculty members are required to seek clarification from AccessAbility Services when needed, facilitate the implementation of accommodations when necessary, and work collaboratively with AccessAbility Services to determine an appropriate alternative accommodation if the accommodation would cause undue hardship (e.g., compromise academic integrity or fundamentally alter the essential components of the course/program/milestone). (Refer to appendix A: Reasonable Accommodations, Essential Requirements, and Undue Hardship).

4. Communicate with AccessAbility Services if there are concerns that an accommodation is not appropriately meeting a student’s needs.

5. Refer all students to AccessAbility Services who request academic accommodations because of a known or suspected disability, or who are believed to require academic accommodations (Refer to appendix C: Referring Student to AccessAbility Services).

6. Provide AccessAbility Services with course syllabus (reading lists), course materials, tests and Testing Agreements (when required) to allow for alternative formatting and exam facilitation, in accordance with the schedule identified in Appendix D (Refer to Appendix D: Timeline Requirements to Facilitate Accommodations). Graduate programs or supervisors will coordinate with AccessAbility Services on the format and structure of the graduate milestones for which accommodations are being sought.

7. Design and revise courses in an inclusive manner. Specifically, courses should be designed to accommodate the needs of learners with a variety of disabilities who might wish to enroll in the course. Course instructors/faculty members are encouraged to seek support from the Center for Teaching Excellence for creating accessible and inclusive learning environments https://uwaterloo.ca/centre-for-teaching-excellence/. The Centre for Extended Learning supports course instructors/faculty members with designing accessible and inclusive online courses: https://uwaterloo.ca/extended-learning/.

Responsibility of Academic Administrators

Academic Administrators (including Provost/Associate Vice Presidents, Deans/Associate Deans, Department Chairs/Associate Chairs, program directors, non-academic units offering academic programming, department heads, Cooperative Education administrators, support staff, etc.), have an important role to play in supporting the academic accommodation process. As such, academic administrators will:

1. Ensure staff, course instructors/faculty members within their respective department have awareness of these guidelines and their relationship to departmental practices.

2. Act in their capacity to ensure that course instructors/faculty members receive resources and
required support in order to implement any approved accommodations. It is important to note that the University has a legal duty to accommodate students with disabilities to the point of undue hardship – which is applied at the institutional level. Thus, if a student requires an accommodation that an individual course instructor/faculty member or department cannot provide alone (either due to excessive time demands, individual capabilities, limited departmental budgets, etc.), academic administrators need to work collaboratively to facilitate the accommodations that have been determined to be reasonable under these guidelines (Refer Appendix A: Reasonable Accommodations, Essential Requirements, and Undue Hardship).

3. Act in their capacity to ensure that course instructors/faculty members receive resources and required support to design new or revised programs/curricula to be inclusive so as to address the needs of learners with disabilities.

4. Collaborate with AccessAbility Services to resolve accommodation disputes, ensure approved academic accommodations are upheld (to the point of undue hardship), and support students with disabilities registered with AccessAbility Services as required.

5. Act in their capacity to ensure all incoming and current student are effectively informed of the accommodations and supports available to students with known or suspected disabilities.

2: DISPUTE RESOLUTION PROCESS

While there is an overarching obligation on all parties to cooperate in the accommodation process, there may be times where a party to the process disagrees with an approved accommodation and/or outcome (e.g., a course instructor believes that allowing the specific accommodation would cause undue hardship as it would fundamentally alter the course’s essential requirements. In these instances, it is imperative that there is a quick resolution as “dispute resolution procedures that are not timely or effective could amount to a failure of the duty to accommodate” (OHRC, 2003, p.59). In an effort to resolve these matters, students, faculty members, and staff may follow this informal dispute resolution process:

Informal Dispute Resolution Process

- Course instructors/faculty members who cannot agree to the suggested accommodation on the basis that it would cause undue hardship (i.e., compromise the essential requirements of the course or program) will email AccessAbility Services’ Manager, Student Accommodations (contact information provided in the Faculty Notification Letter) to set a meeting within 5-10 business days of receiving notice of the accommodation. If the original accommodation is agreed to cause undue hardship, then AccessAbility Services and the instructor will explore whether an alternate and equivalent accommodation can be implemented. **Note: Course instructors/Faculty Members will apply the originally approved accommodation plan as defined by AccessAbility Services during the dispute resolution process until a decision is made.**
• Students who become aware that their accommodation plan is not being upheld will make an appointment with AccessAbility Services to discuss the matter. This should occur within 5-10 days of said awareness. AccessAbility Services will email the course instructor/faculty member to set a meeting, within 5-10 business days, to understand why the accommodation is not being upheld. If the original accommodation is agreed to cause undue hardship, then AccessAbility Services and the instructor will explore whether an alternate and equivalent accommodation can be implemented.

• Should AccessAbility Services and the course instructor/faculty member not be able to agree upon the original and/or alternative accommodation, AccessAbility Services may email the course instructor’s/faculty member’s Department Chair/School Director (or designate) and/or Associate Dean, within 5 business days, to verify whether the original accommodation would cause undue hardship, and if so, to determine an alternative and equivalent accommodation. **Note: Course instructors/Faculty Members will apply the originally approved accommodation plan as defined by AccessAbility Services during the dispute resolution process until a decision is made.**

• Students who are concerned with the accommodation plan designed by AccessAbility Services, or the services and supports offered by AccessAbility Services will first speak with an Accommodation Consultant. If the matter is not sufficiently resolved, the matter may be escalated to AccessAbility Services’ Manager, Student Accommodations, and then Associate Director, if needed.

**Formal Dispute Resolution Process**

If the accommodation dispute cannot be resolved informally, the student may file a petition or grievance following the policies and procedures identified in Policy 70 ([https://uwaterloo.ca/secretariat/policies-procedures-guidelines/policy-70](https://uwaterloo.ca/secretariat/policies-procedures-guidelines/policy-70)). **Note: Course instructors/faculty members will apply the originally approved accommodation plan as defined by AccessAbility Services during the dispute resolution process until a decision is made.**

**3: RETROACTIVE ACCOMMODATIONS**

Retroactive accommodations are requests for an accommodation that arises after a deadline or the completion of a test, academic milestone, or course. The University has a duty to meaningfully consider all requests for retroactive accommodations, on a case-by-case basis. Determining whether the request ought to be granted is a separate process, described below.

**Course Instructor's/Faculty Member's Role**

When a student requests a retroactive accommodation related to a disability during the course or when actively pursuing the academic milestone, the course instructor/faculty member should:
1. Inform the student that retroactive accommodations will be considered, and that AccessAbility Services will need to be consulted and engaged in the process to consider their request.
2. Refer the student to AccessAbility Services (Refer to Appendix C: Referring Student to AccessAbility Services).
3. Maintain the student’s privacy by not requesting, accepting, or reviewing documentation related to their medical or personal health. Only AccessAbility Services will need to review and store medical documentation (Refer to appendix D: Protecting Personal Health Information).
4. Contact AccessAbility Services to engage in the retroactive accommodation process which will determine if a retroactive accommodation should be granted, and if so, determine a reasonable accommodation.

**Student’s Role**

1. Inform the course instructor/faculty member about their request for a retroactive accommodation, if still enrolled in the course or actively pursuing the academic milestone.
2. Apply with AccessAbility Services (using the process identified in Procedure 1) and indicate in the application that they are seeking support for a retroactive accommodation (if not already registered).
3. Make an appointment with AccessAbility Services to discuss the request for a retroactive accommodation. Students may be asked to obtain and/or submit additional medical documentation to support the request for a retroactive accommodation.

**AccessAbility Services’ Role**

When notified of a student’s request for a retroactive accommodation, AccessAbility Services will:

1. Receive and vet medical documentation and other materials related to the retroactive accommodation request. Additional medical documentation may be required to support the request.
2. Assess student medical documentation to determine the impact of the condition on academic performance during the specified time.
3. Meet with the student to discuss the request.
4. Create a report describing the chronology of the student’s engagement with the office to the course instructor/faculty member and/or petition committee, if applicable.
5. Complete a final determination as to whether the student is eligible to receive a retroactive accommodation on the grounds of disability based on factors such as:
   a. the documented need,
   b. the quality and specificity of the evidence,
   c. the knowledge of the disability prior to the request,
d. the timing of the request and the rationale for the delay in requesting the accommodation,
e. the accommodations, if any, that would have been applied had the request been made earlier, and
f. the essential components of the course and program.

6. If AccessAbility Services determines a retroactive accommodation is required during a course, AccessAbility Services will collaborate with the course instructor/faculty member to determine the most appropriate retroactive accommodation in light of all information, and after considering the following:
   a. the effort the student will have to put forth to support the accommodation,
   b. the impact on the student’s progression,
   c. whether the academic record will demonstrate student’s level of knowledge (maintaining integrity of the program), and
   d. the time/timelines of both the request and the time to manage the request.

7. If AccessAbility Services determines that the student is not eligible for retroactive accommodations, the reasons will be provided to the student in person or in writing.

**Retroactive Accommodation after Completion of Course/Milestone**

If the retroactive accommodation is for a completed course or milestone, the student will seek a retroactive accommodation via a petition or grievance (e.g., if student alleges that an accommodation was not provided) under Policy 70, indicating a request for retroactive accommodation (https://uwaterloo.ca/secretariat/policies-procedures-guidelines/policy-70). The petition committee/assigned decision-maker will determine the most reasonable accommodation in light of all information included in the petition/grievance, as well as the considerations listed above. The petition committee/assigned decision-maker is encouraged engage AccessAbility Services in its adjudication to ensure an appropriate accommodation is provided.
APPENDIX A: REASONABLE ACCOMMODATIONS, ESSENTIAL REQUIREMENTS, AND UNDUE HARDSHIP

**Reasonable Accommodation**

Within the postsecondary context, reasonable academic accommodations for students with disabilities are modifications or adjustments to the way a student with a disability receives course curriculum and materials, participates in course activities, or demonstrates mastery of course content and skill, that enables an otherwise qualified student with a disability, access to or participation in University-sponsored programs (OHRC, 2004). Reasonable accommodations are not intended to alter the fundamental purpose or essential requirements of the academic program or course. Rather, they are a means of preventing and removing barriers that impede students with disabilities from participating fully in the educational environment in a way that is responsive to their own unique circumstances. The principles of accommodation are threefold: dignity, individualization and inclusion (OHRC, 2004).

Reasonable accommodation is a cooperative process, and the University, in particular AccessAbility Services, will work with the student and the course instructor/faculty member and/or academic unit as necessary to develop appropriate reasonable accommodation solutions. Reasonable accommodation(s) is determined on an individual basis and must relate to the student’s specific functional limitations within the academic setting so that accommodation(s) may vary from class to class depending upon course content and format. Reasonable accommodation(s) is intended to be effective and reasonable and may not be exactly what the student wishes or requests. As stated by the Ontario Human Rights Commission, the purpose of the Code is to accommodate a person’s needs, not their preferences.

**Essential Requirements**

The term “essential requirements” is used in Human Rights legislation to guide decisions about accommodations for individuals with disabilities. Essential requirements refer to the knowledge and skills “that all students must demonstrate with or without using accommodations” (Stanford University). It is important to distinguish between what is absolutely essential and what is non-essential because it is the non-essential components of course concepts that can be altered without diminishing the integrity of the task or course. Identifying essential requirements also informs decisions about course design and assessment. Essential requirements are considered at multiple levels: a specific assignment, skill, task, course outcome, or program outcome.

To assist with determining whether a requirement is essential, one would want to consider the following:

- Is the requirement rationally connected to the task or purpose it is intended for (as opposed to habit, tradition, ease)?
- Is there evidence to support that the requirement is essential?
- Is the requirement socially constructed such that it excludes specific groups for a reason that is
irrelevant based on assumptions about function or the group?

For more information about essential requirements, and their connection to grades and learning outcomes, please refer to the ‘teaching tips’ section of the Centre for Teaching Excellence’s website: https://uwaterloo.ca/centre-for-teaching-excellence/resources/teaching-tips.

**Undue Hardship**

Undue Hardship is the outer limit of the accommodation obligation, and refers to activities, impacts or effects that would: (i) alter the essential requirements of a course, program of study, or academic milestone such that the fundamental nature of the course, program, or academic milestone is compromised, (ii) result in undue or excessive costs, or (iii) unreasonably interfere with the health and safety of other members of the University community.

Undue hardship is considered individually, within the full context of a particular request for reasonable academic accommodation. The evidence required to prove undue hardship must be objective, real, direct and, in the case of cost, quantifiable. Costs will be considered in relation to the University as a whole, and not in relation to a single course instructor/faculty member, department or Faculty. A mere assertion of undue hardship, based on impressionistic views or stereotypes, is not sufficient.

For additional information on the interpretation and facilitation of reasonable accommodation, essential requirements, and undue hardship, please contact AccessAbility Services and the Centre for Teaching Excellence.
APPENDIX B: DOCUMENTATION REQUIREMENTS

The Ontario Human Rights Commission (OHRC), articulates the role of documented medical information in the accommodation process (including psycho-educational assessments and other rehabilitative documentation), noting that organizations must have enough information to allow them to meet their duty to accommodate. The documentation process is intended to be neither onerous nor intrusive. Rather, documentation supporting the need for an accommodation is intended to provide the University of Waterloo’s AccessAbility Services with critical information about the functional limitations that a student experiences as a result of their specific disability, for the purpose of designing an appropriate accommodation plan. As the OHRC stated in their Policy (2016):

*There is no set formula for accommodating people identified by Code grounds. Each person’s needs are unique and must be considered afresh when an accommodation request is made. People sharing the same condition often experience it in very different ways, with different symptoms, limitations and prognoses. In terms of accommodation, what might work for one person may not work for another.*

Documentation Requirements

Students requesting an accommodation can be expected to provide documentation that includes: a) a statement indicating the presence of a disability, and b) the functional limitations or needs associated with the disability within a postsecondary context. The supporting documentation must be current, comprehensive and may include clinical and social histories from parents, counsellors and specialists. Written confirmation shall come from a licensed medical/psychological professional (e.g., family doctor, surgeon, psychiatrist, or psychologist) who is qualified to make the diagnosis or statement of functional limitation, and is acting within their scope of practice. The OHRC (2016, p. 47), in their Policy on Ableism and Discrimination Based on Disability further states that:

*Mere assertions of symptoms, such as statements that the person experiences “stress,” “pain” or “feels unwell” – things that many people commonly experience – may not be enough to establish a disability within the meaning and protection of human rights legislation. If choosing to disclose such information in writing, individuals and doctors should make it clear that these symptoms relate to a disability (p. 47).*

Consistent with the OHRC’s Policy on Academic Accommodation For Students With Disabilities (2018), students are not required to disclose their disability diagnosis in order to register with AccessAbility Services to receive academic accommodations. A diagnosis should only be requested where a person’s needs are complex, challenging or unclear and more information is needed, or where the information clearly relates to the accommodation being sought. Rather, the focus should be on the functional...
limitations associated with the disability, as this helps to support the development of appropriate accommodations while respecting dignity and privacy.

### Requesting Additional Documentation

According to the OHRC, AccessAbility Services may request additional or updated medical documentation in a range of circumstances, including:

- Where a disability is identified as temporary
- Where academic accommodations need to be re-visited over time to ensure that they continue to meet the student’s needs appropriately
- Where there is a reasonable basis to question the legitimacy of a person’s request for accommodation
- When the information provided is deemed inadequate.

If the student does not provide additional information when requested, and AccessAbility Services can show that this information is needed, then, according to the OHRC, the student could be found to not have taken part in the accommodation process and the accommodation provider would likely be relieved of further responsibility.

### Disability Verification Forms

AccessAbility Services has available on its website various disability verification forms that help to facilitate the medical documentation process, ensuring students receive documentation from their health care practitioner that is appropriate for the development of academic accommodations: [https://uwaterloo.ca/accessability-services/current-students/documentation](https://uwaterloo.ca/accessability-services/current-students/documentation). Interim accommodations and support may be available to students who suspect they may have a disability pending the receipt of medical documentation. Such students are encouraged to apply online or contact the Office directly.

For additional information on documentation requirements, and the role of documentation in the student academic accommodation process, please contact AccessAbility Services.
APPENDIX C: REFERRING STUDENTS TO ACCESSABILITY SERVICES

Postsecondary institutions have a legal duty to accommodate disabilities, but they also have a “duty to Inquire”. This means that educators must attempt to help students who are unwell or perceived to have a disability by offering assistance and accommodations. This is because some disabilities leave students unable to identify that they have a disability, or that they require an accommodation. As the Ontario Human Rights Commission stated, in their 2018 report ‘Policy on accessible education for students with disabilities’:

Where an education provider is aware, or reasonably ought to be aware, that there may be a relationship between a disability and a student’s behavior or academic performance, the education provider has a “duty to inquire” into that possible relationship before making a decision that would affect the student adversely (p. 73).

It can be difficult for educators to know when and how to refer a student to AccessAbility Services for consideration for academic accommodation and support. It is important to note that when in doubt, it is best to refer a student to AccessAbility Services, as there will never be a wrong referral. Students who do not have a documented disability are still able to apply. AccessAbility Services will work with the student to determine if an interim accommodation plan is needed pending documentation. If the student is not eligible for academic accommodations, AccessAbility Services will assist the student in connecting with resources and supports that may be more appropriate.

When to Refer to AccessAbility Services

Scenario 1: Student discloses a disability (known or suspected), illness, or symptoms

- Student discloses a known disability, illness, condition, or traumatic event (e.g., “I find this difficult because of my ADHD”, “I have low vision”, or “I broke my wrist”).
- Student discloses a suspected disability, illness, or condition (e.g., “I think I may be depressed”, “I can’t seem to get over that traumatic event”, or “maybe I have a learning disability”).
- Student discloses symptoms that may be a result of an underlying condition (e.g., “I feel anxious”, “I can’t concentrate”, “I’m having difficulty seeing the board”, or “I’m emotionally unwell”).
- Student requests an accommodation for health reasons (e.g., “Can I get an extension, I’m registered with AccessAbilty Services?”, or “I need an extension, I couldn’t get my work done because of my health”).
- Student requests a retroactive accommodation (e.g., “I want to re-take that test because I had to write it without accommodations”, or “I couldn’t complete the assignment due last week because I was emotionally unwell”).
Scenario 2: You suspect a student may have a disability/illness or may require accommodations

Some examples of when you should refer to AccessAbility Services are:

- **You suspect** a student’s actions, behaviors, or performances may be impacted by an underlying disability, illness, condition, or traumatic event (e.g., student used to present as cheerful in class but now is having emotional outbursts that are not typical for them, or, student is attentive and engaged in the course yet their grades do not reflect their efforts).

- Student has submitted **multiple Verification of Illness Forms (VIF)**, and/or there is an **extended time of incapacitation** (e.g., student submitted three VIF in your course thus far, or the VIF indicates moderate to severe incapacitation for longer than a week).

### How to Refer to AccessAbility Services

**Referring a student who discloses a disability (known or suspected), illness or symptoms**

You may want to:

1. Thank the student for confiding in you
2. Indicate that you work with AccessAbility Services to ensure students are appropriately accommodated and supported.
3. Indicate that AccessAbility Services facilitates the provision of academic accommodations for students with permanent, temporary, or even suspected disabilities. Even if the student is unsure of whether they qualify for accommodation support, AccessAbility Services can talk them through next steps, consider interim accommodations, and refer them elsewhere if appropriate.
4. Ask the student if they are comfortable with you referring them to AccessAbility Services. You can offer to email AccessAbility Services on their behalf and copy them. You can also sit with them while they complete the online application which should not take more than a few minutes to complete: https://uwaterloo.ca/accessability-services/
5. Indicate that in order to protect their privacy, only AccessAbility Services will review and store medical documentation.
6. If appropriate, you can follow up with the student throughout the term to see how the course, and any accommodations, are meeting their learning needs. This discussion will not be about their specific disability, but rather about how the accommodations and classroom environment are working for them.

**Referring a student who you suspect has a disability or may require accommodations**

You may want to:

1. Indicate that you have observed that they are experiencing some challenges academically, and that you want to help them get the support they need.
2. Indicate that there are a variety of campus supports and services designed to aid a student’s
success, including the Writing and Communication Centre, the Student Success Office, and Counselling Services, which are available to all students. Indicate that AccessAbility Services is another resource if they feel they may need academic accommodations or support.

3. Indicate that AccessAbility Services facilitates academic accommodations for students with permanent, temporary, or even suspected disabilities. Even if a student is unsure of whether they qualify for accommodation support, AccessAbility Services can talk them through next steps, consider interim accommodations, and refer them elsewhere if appropriate.

4. Ask the student if they are comfortable with you referring them to AccessAbility Services. You can offer to email AccessAbility Services on their behalf and cc them. You can also sit with them while they complete the online application which should not take more than a few minutes to complete: https://uwaterloo.ca/accessability-services/

5. Indicate that in order to protect their privacy, only AccessAbility Services will review and store medical documentation.

6. If appropriate, you can follow up with the student throughout the term to see how the course, and any accommodations, are meeting their learning needs. This discussion will not be about their specific disability, but rather about how the accommodations and classroom environment are working for them.

Referring a student who requests a Retroactive Accommodation on the grounds that the delay/failure/omission was disability related:

You may want to:

1. Inform students that retroactive accommodations will be thoughtfully considered.

2. Inform student that in order to consider retroactive accommodations that are disability related, AccessAbility Services will need to be consulted and engaged in the process to protect the student’s privacy and ensure the student is supported.

3. Ask the student if they are comfortable with you referring them to AccessAbility Services. You can offer to email AccessAbility Services on their behalf and cc them. You can also sit with them while they complete the online application which should not take more than a few minutes to complete: https://uwaterloo.ca/accessability-services/

4. Indicate that in order to protect their privacy, only AccessAbility Services will need to review and store medical documentation. Note: If a student is not registered, AccessAbility Services will ask them to supply the office with appropriate medical documentation, or support them in obtaining it. AccessAbility Services will then review and vet documentation and speak with the student about the situation.

5. Let the student know that you will follow up with them once a decision has been made, where appropriate.
APPENDIX D: COURSE INSTRUCTOR TIMELINE REQUIREMENTS TO FACILITATE ACCOMMODATIONS

AccessAbility Services helps course instructors/faculty members provide a learning experience where students with disabilities: a) receive course materials in accessible formats (e.g., braille or enlarged textbooks and materials), b) can participate fully in class (e.g., using a sign language interpreter or classroom aide), and c) write tests and exams with all approved accommodations (e.g., scribes, assistive technology, extended writing time, etc.).

As indicated by the Ontario Human Rights Commission, educators have the responsibility to implement accommodations in a timely way, to the point of undue hardship. In order to ensure students receive their approved accommodations in a timely and appropriate manner, consistent with legal requirements, AccessAbility Services requires course instructors/faculty members to collaborate and participate fully in the process and submit materials and information to the office in a timely manner. Below are the guidelines required for AccessAbility Services to facilitate the accommodations on behalf of the course instructor/faculty member.

Requirements for AccessAbility Services to Facilitate Testing Accommodations

1. COMPLETE THE TESTING AGREEMENT 2 WEEKS PRIOR TO THE SCHEDULED TEST

Course instructors/faculty members (whose courses require tests) are required to complete a Testing Agreement two weeks prior to the scheduled test. Testing Agreements enable AccessAbility Services to understand the conditions of the test (e.g., the use of allowable aids/materials), and appropriately schedule and prepare for the test. Without this critical information, AccessAbility Services is not able to guarantee that students will be writing under the same conditions as those in the class. Course instructors will be provided with information on completing the Testing Agreement in the Faculty Notification Letter (email).

2. SUBMIT TESTS 2 BUSINESS DAYS PRIOR TO THE START OF THE TEST

All tests must be received by AccessAbility Services 2 business days prior to the start of the test. This enables AccessAbility Services to apply any accommodation modifications (such as enlargement/braille), and print/batch the exams. Tests will not be facilitated by AccessAbility Services without receiving the test within 2 business days.

Course instructors who do not submit a Testing Agreement and/or who do not submit the test on time will be required to:

a) Facilitate the test on their own, ensuring all approved accommodations are upheld, or
b) Defer the test for the student requiring an accommodation, until AccessAbility Services has the Testing Agreement and/or test within the aforementioned timeline.
Requirements for AccessAbility Services’ Alternate Format Production

AccessAbility Services can produce accessible course materials on behalf of course instructors/faculty members. However, this can only occur once AccessAbility Services has received all required materials in advance.

1. **SUBMIT ALL COURSE MATERIALS TO ACCESSABILITY SERVICES IN ADVANCE OF THE COURSE/CLASS**

When course instructors/faculty members are notified in the Faculty Notification Letter that a student in their class requires alternate production of course materials, course instructors are asked to send all required course materials to AccessAbility Services using the following schedule:

<table>
<thead>
<tr>
<th>Item</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit a copy of the syllabus (including a list of all textbooks, course readings, and audio-visual content)</td>
<td>Upon request Note: This can be as early as 4 weeks in advance of the course to arrange alternate production of textbooks</td>
</tr>
<tr>
<td>Submit materials that will be handed out in class</td>
<td>3 business days prior to the class</td>
</tr>
<tr>
<td>Submit PowerPoint presentations, including alternative text and long descriptions (when appropriate)</td>
<td>1 business day prior to class</td>
</tr>
</tbody>
</table>

This schedule will need to be maintained throughout the duration of the course, unless told otherwise. Course instructors who are not able to meet the schedule are required to contact AccessAbility Services within 24 hours to determine if an alternate arrangement can be made.

2. **DESIGN FOR ACCESSIBILITY UPFRONT**

In order for AccessAbility Services to produce alternate format of course materials, course instructors are advised to design for accessibility upfront, and are asked to be prepared to:

- Identify textbooks, course readings, and audio-visual materials ideally 4-6 weeks in advance of the semester so that they are available when requested by AccessAbility Services.
- Select audio-visual materials that already have closed captioning and visual descriptions.
- Always including alternative text and long descriptions for images (photos, charts, etc.) in PowerPoint presentations and other materials.
The Ontario Human Rights Commission has directed all postsecondary institutions to NOT require students to reveal their private medical information to, or seek accommodation directly from, their professors, course instructors, teaching assistants, etc. This is a measure to protect a student’s personal and private medical health information.

The best approach is for course instructors/faculty members, and academic support staff to not view or accept medical documentation or private health information. It is appropriate for a course instructor, faculty member, and academic support staff to view a UW Verification of Illness Form, provided it does not contain any additional information on the form that includes personal health information.

If you already have collected private medical information from a student, it is important to safely dispose of, or store it:

- If the student has graduated, withdrawn or gone inactive more than two years ago, shred using the University of Waterloo’s confidential shredding method.
- If you are in contact with the student, indicate that only AccessAbility Services should be in receipt of their medical documentation for the purposes of accommodation planning. Ask them for consent to send it to AccessAbility Services for appropriate and confidential storage. While verbal consent is appropriate, you should follow up with an email summarizing your discussion.

For additional information on storing and retaining personal health information, please contact the Secretariat.