

OFFICE FOR STUDENT ACCESS

Student Handbook for Disability Accommodations



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Introduction - Equal Access to the Academic Experience

OHSU's fundamental purpose is to improve the well-being of people in Oregon and beyond. As part of our multifaceted public mission, OHSU strives for excellence in education, research, clinical practice, scholarship and community service. There are many shared values which support this mission, including welcoming diversity and celebrating the contributions of individuals from all walks of life.

The Office for Student Access (OSA) supports the mission and value of diversity at OHSU by facilitating and supporting equal access to its programs and services for students who experience disability. Students who require academic accommodations begin their request with OSA. OSA will then engage in an interactive process with the student and academic departments, as needed, to determine which accommodations are reasonable and will facilitate equal access. Reasonable accommodations are approved on a case-by-case basis and may include academic adjustments, auxiliary aids and/or program modifications. Reasonable accommodations are designed to give students an equal opportunity to participate in an academic program by eliminating or reducing disability-related barriers without fundamentally altering the program, lowering standards, or posing a threat to health/safety.

Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA) of 1990, the ADA Amendments Act (ADAAA) of 2008 as well as other applicable federal and state regulations prohibiting discrimination on the basis of disability help guide OSA's work with students. In addition to the ADA and ADAAA, OHSU has specific policies that provide additional guidance. Students should review all OHSU policies related to equal access for students with disabilities. ***Students requesting accommodations are strongly encouraged to review this handbook and related policies in their entirety.***

Related Policies

- [02-01-002 Equal Access for Students with Disabilities](#)
- [02-70-010 Technical Standards](#)
- [02-70-050 Exam Proctoring](#)
- [02-70-045 Change in Scheduled Examination and Other Assessments](#)
- [03-05-048 Discrimination, Harassment, and Retaliation](#)
- [03-05-055 Accommodations](#)
- [07-90-060 Service Animals, Therapy Assistance Animals, and Pets](#)
- [08-01-005 Access for Members of the Public to Programs, Services & Activities](#)
- [08-01-006 Physical Access Committee](#)
- [08-01-010 Accessibility of Digital Information](#)

Chapter 1 - Rights & Responsibilities

Student Rights

Qualified students with disabilities have the right to:

- An equal opportunity to participate in and benefit from courses, programs, services, and activities offered through the University.
- An equal opportunity to receive reasonable accommodations (academic adjustments, auxiliary aids, and services).
- Appropriate confidentiality of information regarding their disability and to choose to whom, outside the University and its partners, information about their disability will be disclosed, except as disclosures that are required/permitted by law and OHSU policy/procedures. Student disability records fall under the Family Educational Rights and Privacy Act (FERPA).
- Equally effective communication.

Student Responsibilities

OSA does not require students to use accommodations. Students are responsible for following established procedures to request reasonable accommodations. Otherwise, qualified students with disabilities who wish to obtain accommodations are responsible for:

- Meeting and maintaining OHSU's fundamental academic and [technical standards](#) (with or without reasonable accommodations).
- Self-identifying as an individual with a disability if accommodations are being requested.
- Following institutional policy, procedures, and guidelines to request information, services, and accommodations.
- Submitting documentation from a qualified and appropriate professional demonstrating how the disability impacts participation in courses, programs, services, or activities. This documentation should meet the [OSA Documentation Requirements](#).
- Requesting accommodations in a timely manner in alignment with the [accommodation request timeline](#).
- Demonstrating competency in learning outcomes for courses, academic programs, and activities as required by their academic program.
- Communicating with faculty, service providers, and academic programs regarding accommodations (anonymity is not guaranteed). Read more about how information is shared in [Understanding Confidentiality](#).
- Notifying OSA of any issues, concerns, or delays regarding accommodations.

Chapter 2 - The Accommodation Process

An interactive process is used to determine reasonable accommodations, therefore OSA **requires** students to provide critical information to aid in accommodation determinations. OSA recommends that students submit an application and documentation to OSA immediately after they are admitted to OHSU. It may take two to four weeks for OSA to review documentation, the application, and collect necessary information. Students can expect their accommodation letter within 5 business days after the following items are submitted and complete:

- Disability documentation that meets [OSA documentation requirements](#)
- [OSA Application for Accommodations](#)
- Initial Appointment - Appointments can be scheduled using the [online scheduling links found on our OSA webpage](#).
- Any additional information requested from student and/or academic program to aid OSA in making a determination

We require advance notice in order to coordinate your accommodations. Please see our [Accommodation Timeline](#) for applicable deadlines. Here is an overview of the process:

- Please review our [Documentation Requirements](#)
- Submit an [Application for Accommodation](#)
- Submit documentation by uploading the documentation via your application for accommodation (an upload option will appear after you successfully submit your application). A link will also be emailed to you at the time you submit your application. If documentation cannot be uploaded it may be provided via:
 - **Email:** studentaccess@ohsu.edu
 - **Mail:** 3181 SW Sam Jackson Park Rd., Portland, OR 97239 – Mail Code: L624
 - **Fax:** (503) 346-8068 - Please ensure that **OHSU Student Access** is included on the cover sheet
- Schedule and complete an Initial Appointment with OSA. Appointments can be scheduled using the [online scheduling links found on our OSA webpage](#).
- In order to make a determination, OSA may need additional information. Please respond to any requests for further information/documentation from OSA as soon as possible to avoid delays.
- Once approved for accommodations, OSA will complete your accommodation letter and email it to you, your Program Accommodation Liaison (PAL), and other staff members in your academic program who assist in the implementation of your accommodations. Students are responsible for ensuring their faculty and/or program staff receive a copy of their accommodation letter. For more information regarding specific program procedures related to accommodation notifications, students should refer to the

guidance in their accommodation letter. Students who require assistance in notifying faculty or other staff can reach out to OSA or their PAL.

- Review your accommodation letter and guidelines and follow the specific procedures related to your accommodations. Keep in mind that some accommodations may be reasonable in some parts of the curriculum and not in others. Contact OSA with any questions or concerns.
- Unless accommodations are provisional, the letter is valid for the duration of your attendance at OHSU. If you need additional or different accommodations, please contact OSA, additional documentation may be required.
- Accommodations are implemented by each academic program/faculty. Your PAL is your point person for questions, concerns, or issues but you can and should notify OSA of any problems or concerns immediately.
- OSA can informally assist students in resolving accommodation related issues. Students have the right at any time to file a complaint on the basis of disability discrimination through the [Office of Civil Rights Investigations and Compliance \(OCIC\)](#) or through the [Department of Education's Office for Civil Rights \(OCR\)](#).

Chapter 3 - What are Reasonable Accommodations?

Qualified students with disabilities are entitled to reasonable accommodations allowing them an equal opportunity to participate, enjoy the same benefits and privileges, and attain the same level of achievement as similarly situated students without disabilities in OHSU programs and activities.

OHSU is only responsible for providing accommodations to students who self-identify as having a disability, provide documentation that meets our requirements, and who follow the established processes for requesting accommodations outlined in [Chapter 2 - The Accommodation Process](#). OSA may require information from a student's PAL, faculty, or academic program to aid in the determination of reasonable accommodations.

An accommodation is a modification to an OHSU course, program, policy, procedure, provision of an auxiliary aid, or other service which facilitates equal opportunity. Additionally, a reasonable accommodation does not:

- Fundamentally alter the nature of the program or activity
- Remove essential requirements
- Lower academic standards
- Present an undue financial or administrative burden on the university
- Pose a threat to the safety of others or the public
- Constitute a service of personal nature

Guiding Questions Used to Determine Reasonable Accommodations

1. Does the student have a documented disability?
2. Is the student otherwise qualified?
3. Is the accommodation requested a personal service?
4. Does the accommodation requested reduce disability-related barriers the student experiences on the campus, in the course, program, or activity?
5. Can the student access the campus, course, program, or activity without an accommodation?
6. Does the accommodation allow the student to participate in the most integrated setting possible?
7. Are there other equally effective accommodations that may reduce the barriers?
8. Is the accommodation requested a fundamental alteration: does it alter/remove essential requirements or lower academic standards?
9. Is it an undue financial or administrative burden?
10. Does the accommodation pose a threat to the safety of others or the public?

Personal Services

Personal services are not considered reasonable accommodations. OHSU is not required to provide students with personal services, per [Title II of the ADA](#).

Common personal services include, but are not limited to: personal care attendants, private tutoring, childcare, medical devices (mobility devices, hearing aids, eyeglasses, etc.), and personal transportation.

OSA may refer students to resources that are available to all students, or available within the the university and community such as: the [Academic Success Center](#), [Student Health and Wellness](#), [Tri-Met](#), etc.

Why an accommodation may be denied

The Office for Student Access engages in an interactive process with the student and the academic program to determine if accommodation requests are reasonable. Sometimes a provider-recommended accommodation may be considered a personal service, fundamental alteration, an undue burden, or a threat to others/public and is not approved. Accommodation requests also may be denied if a student fails to provide appropriate supporting documentation or fails to follow OHSU's policy or established procedures for obtaining accommodations.

Chapter 4 - Accommodation Timeline

Please allow up to 4 weeks for OSA to review any new accommodation request. The timeline below describes the notice needed for **already approved** accommodations.

Students with approved accommodations must request the accommodations for each course, program activity, and/or clinical rotation. OSA encourages students to send the accommodation letter and meet with faculty, instructors, course directors, clinical supervisors, or academic program staff (whoever is facilitating the course) to discuss your accommodations and make a plan to implement them. Remember, accommodations are not retroactive.

Please see the timeline below for minimum time requirements for approved accommodations. If an accommodation is requested after the deadline, faculty will make a reasonable effort to accommodate your request, however they may not always be able to do so. Untimely requests may result in delay, substitution, or denial of an accommodation.

Accommodation Type	Time Required
Interpreting, Real-time Captioning, Real-time Transcribing, Video Captioning, Classroom Relocation, Braille materials	Within 48 hours of registering for the course. These accommodations may take up to 4 weeks to coordinate.
Accessible Furniture	At least 3 weeks prior to beginning of the course.
Classroom Assistant, Lab Assistant, Library Assistant, Clinical Assistant (intermediary)	At least 3 weeks prior to beginning of the course.
Textbooks and Course Materials in Accessible Formats	At least 2 weeks prior to the beginning of the course.
Peer Note Taker	1 week prior to the beginning of the course.
Exam Accommodations	Minimum advance notice is 10 business days to schedule the exam with the appropriate individual (ask OSA or PAL if you are unsure).
Consideration for Flexibility with Attendance/Assignments	1 week prior to the beginning of the course.
Housing Accommodations (including assistance animal accommodations)	At least 4 weeks prior to move in.

Chapter 5 - Documentation Requirements

OHSU is committed to providing equal access to qualified students who experience a disability in compliance with [Section 504 of the Rehabilitation Act of 1973](#) and the [Americans with Disabilities Act \(ADA\) of 1990 \(ADA\)](#), as [amended in 2008 \(ADAAA\)](#). As defined by the ADA and ADAAA, a person with a disability has a physical or mental impairment that substantially limits one or more major life activity. Some examples of major life activities include: performing manual tasks, seeing, hearing, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. A qualified student is a person who meets the academic and technical standards for admission and participation in a particular program of study, with or without reasonable accommodations.

Disability documentation assists OHSU's Office for Student Access (OSA) in determining reasonable accommodations on the basis of disability. Students are responsible for providing disability documentation, at their own expense, that meets the requirements listed in this document.

Documentation is required to determine if a student meets the definition of a disability, experiences functional limitations in the academic environment, and that the accommodation requested is likely to eliminate or reduce barriers that the student experiences in OHSU's programs, services, or activities.

All documentation will be evaluated on a case-by-case basis. If you are experiencing a delay or difficulty in obtaining documentation, please contact OSA immediately.

IMPORTANT: Documentation accepted by OHSU for accommodations may not meet the documentation requirements for licensing board examinations (USMLE, NCLEX, etc.). Please consult the exam administrator for their documentation guidelines. If you are experiencing difficulty finding information regarding accommodations for licensing exams, reach out to OSA for assistance.

Requirements

- Documentation should be completed by a qualified professional, such as a treating or diagnosing medical or mental health professional. Documentation from a family member is not acceptable.
- An IEP or 504 Plan is not sufficient documentation by itself but can be included as part of a more comprehensive evaluative report.
- For mental health disabilities, evaluation and documentation should be within the last six months unless the condition is one that has stabilized.
- For a Learning Disability (LD) or Attention Deficit Disorder/Attention Deficit Hyperactivity Disorder (ADD or ADHD) diagnosis please review [Additional Documentation Guidelines for LD, ADD, or ADHD](#).

Formatting the Documentation

There are three acceptable formats for documentation:

- Provide a complete and detailed evaluation or diagnostic report of the condition and impact or limitations caused as a result of the condition(s), such as a complete psychoeducational or neurological evaluation.
- A detailed letter from a health or mental health professional that addresses the questions listed on the [OSA Disability Documentation Form](#) (a short letter from a provider that only includes a diagnosis or a prescription pad note is not sufficient). The letter should be on letterhead with the date, signature and provider credentials.
- A completed [OSA Disability Documentation Form](#) with accompanying assessments or test results as required.

Send completed documentation

- **Upload:** to OSA's secure server with your [Application for Accommodations](#)
- **Mail:** Office for Student Access, 3181 SW Sam Jackson Park Rd., Mail code: L624
Portland, OR 97239-3098
- **Email:** studentaccess@ohsu.edu
- **Fax:** (503) 346-8068 (Please ensure that **OHSU Student Access** is included on the cover sheet)

Additional Documentation Guidelines for Learning Disabilities, ADD, ADHD

Learning Disabilities

A comprehensive psychoeducational assessment based on adult norms from a qualified professional that includes the following:

- DSM-V diagnosis
- Test scores related to intellectual ability, including subtest scores. Acceptable IQ tests:
 - Kaufman Adolescent and Adult Intelligence Test
 - Stanford Binet 5th Edition
 - Wechsler Adult Intelligence Scale – IV (WAIS-IV)
 - Woodcock-Johnson IV (WJ IV)
 - **The following intellectual ability tests are not acceptable:** Kaufman Brief Intelligence Test (KBIT), Slosson Intelligence Test, Wechsler Abbreviated Scale of Intelligence (WASI), and Wechsler Intelligence Scale for Children (WISC).
- A test used to measure academic achievement, including scores and subtest scores. Acceptable achievement tests:
 - Nelson-Denny Reading Test
 - Scholastic Abilities Test for Adults (SATA)
 - Wechsler Individual Achievement Test – III (WIAT-III)
 - Woodcock-Johnson IV Tests of Achievement
 - Woodcock Reading Mastery Tests III (WRMT-III)
 - The following achievement tests are not acceptable: Wide Range Achievement Test 3 or 4
- A test used to measure processing ability, including scores and subtest scores. Acceptable processing tests:
 - Detroit Tests of Learning Aptitude – Adult
 - Woodcock-Johnson IV Tests of Cognitive Abilities
- Profile of academic strengths and weaknesses and how these relate to the academic limitation(s)
- Clinical summary & recommendations for accommodations

ADD/ADHD Guidelines

A comprehensive assessment from a qualified professional, which includes the following:

- DSM-V diagnosis
- Results from scales/checklists:
 - Clinical Assessment of Attention Deficit Adult (CAT-A)
 - Adult ADHD Self-Report Scale (ASRS v1.1)
 - Adult ADHD Self-Report Screening Scale for DSM-5 (ASRS-5)
 - Barkley Home and School Situations Questionnaires and Barkley Adult ADHD Rating Scale-IV (BAARS-IV)
 - Wender Utah Rating Scale – (for adults)
 - AHRQ Technical Review: Diagnosis of AD/HD
 - Conners Rating Scales
- Profile of academic strengths and weaknesses and how these relate to the academic limitation(s)
- Clinical summary & recommendations for accommodations

Chapter 6 - Understanding Confidentiality

OSA is committed to ensuring that all disability records are kept in accordance with federal and state law, as well as OHSU policy and procedure.

In some circumstances, OSA is required to break confidentiality and report information, including disclosures involving imminent threats to safety and mandatory reporting required by law, such as child abuse, elder abuse, or abuse of an individual with a disability. Although rare, OSA also may be required to disclose information as part of a formal external legal process.

Students requesting accommodations from OHSU will be required to submit and sign an [Application for Accommodation](#) acknowledging that they understand that the provision of disability services and accommodations may involve sharing/disclosure of disability information provided by the student with appropriate OHSU and partner institution personnel participating in the accommodation process. It is important for students to understand what their signature means. The following is an explanation of our procedure and practice pertaining to confidentiality and disclosure.

The Interactive Process

Before an accommodation determination is made OSA will engage with the student, appropriate personnel within academic programs, and other OHSU employees as needed to determine how a student's disability can be reasonably accommodated.

The interactive process requires cooperation between OSA, students, academic programs, and personnel at regional campuses and clinical sites. Through the interactive process OSA will work with the student and academic programs to:

- Identify barriers to equal access through information received from the student and their supporting documentation;
- Explore which accommodations may be both effective and reasonable;
- Analyze the nature of the course, program, or activity requirements to ensure that the accommodation requested is not a personal service and does not pose an undue burden, fundamental alteration, or is a threat to health/safety.

In order to engage in the interactive process, OSA may request information from the student via meetings, phone calls, or by email. If a student fails to engage in the interactive process, reasonable accommodations may not be granted.

Supporting Documentation

OHSU has an obligation to confirm that students receiving accommodations are qualified students with disabilities. OSA requests disability documentation and develops accommodation recommendations based on this information. Accommodations and services may not be provided if the student does not provide documentation of a disability, does not have a diagnosed disability, or does not follow OSA and OHSU policies and procedures to obtain

accommodations. Disability documentation/status is housed in a confidential student file and does not become a part of an academic record, transcripts, or letters of recommendation.

Confidentiality and Privacy

Student records maintained by OSA, including disability documentation, fall under FERPA. A student's right to privacy must be balanced against the University's need to know certain information in order to provide requested and recommended services and accommodations.

When a student requests an accommodation, particularly instructional accommodations, the issue arises as to what and how much information the faculty needs and/or has the right to receive. By signing the [Application for Accommodation](#), students acknowledge an understanding that in order for the OSA staff to coordinate, advise and/or administer requested accommodations, disclosure of information to faculty or appropriate administrator/staff may be necessary and/or required.

Disclosure

First, it is important to understand that no one except OSA staff has automatic access to OSA student files. OSA works very closely with a designated Program Accommodation Liaison (PAL) in each of the primary schools (SOM, SON, SOD, Graduate Studies, and SPH). The PAL works closely with OSA to make sure accommodations are implemented effectively for the students in their school. As a result, a PAL is considered part of the team and therefore more information might be disclosed to the PAL than to other faculty and staff.

What do we mean by disclosure? Disclosure exists on a continuum ranging from minimum to full disclosure of disability documentation. An example of minimum disclosure would be the case of a faculty member requesting only confirmation that an OHSU student has a disability and that the accommodations were indeed recommended based on the documentation in the OSA student file. Thus, we have disclosed the presence of a disability and the recommended accommodations.

It is important for a student to understand that whenever we acknowledge that a student has a disability, we have essentially "disclosed" confidential information. Because we talk with faculty and staff in order to implement accommodations, we routinely confirm that the student has a verified disability. Some schools operate programs at other institutions, therefore OSA will need to work with the designated faculty member or administrator for that program at the host campus. Additionally, the host campus disability services office might also need to assist with implementation of accommodations, making some disclosure of information necessary.

Moving along the continuum, discussing with a professor, impacts of the disability (e.g., concentration issues, visual issues, reading issues, etc.) and the rationale for the accommodation requested constitutes more comprehensive disclosure. In this case, the functional limitations of a specific student are disclosed with the intent of assisting the faculty member in understanding the relationship between the disability and the accommodation. Often, the additional information assists faculty in designing an appropriate accommodation.

Finally, full disclosure would be sharing, either verbally or in writing, specific and detailed information regarding a student's disability. For example, providing a copy of a

psychoeducational report or hospital or other medical records would constitute full disclosure of disability documentation. **OSA does not provide full disclosure of disability documentation to faculty.** Providing copies of file information requires a student to sign a Release of Information Form.

Signing the Application for Accommodation

The purpose of signing the [Application for Accommodation](#) is to maintain a record that the student understands our procedure and protocol on disclosure of disability.

What if a student does not sign the Application for Accommodation? Signing the Application acknowledges that the student understands our disclosure procedure; it is not a request for permission. Students requesting that OSA not disclose disability, at any level, must submit in writing their request specifically describing what level, if any, of disclosure they are authorizing. Students are not required to sign the Application for Accommodation form. If a student asks that we do not discuss their situation with faculty or staff, their request will be honored, however, students need to understand that if they are requesting OSA to provide accommodations, and if they prohibit the individuals responsible for implementing accommodations from discussing critical components of the situation (such as the relationship of the disability to the course and the requested accommodations), then it may not be possible to implement an accommodation.

Summary of Confidentiality Procedures

- The University has an obligation to confirm disability status and the right for appropriate staff to discuss students and their disabilities.
- Students have a right to privacy with minimal disclosure of confidential information.
- Students sign the Application for Accommodation form acknowledging that some level of disclosure may be necessary to selected faculty, administrators, and staff in order to implement requested accommodations.
- Disability documentation is not shared directly with faculty; however, Program Accommodation Liaisons (PALs) may on occasion, as deemed necessary, have access to such records.
- If students do not want OSA to disclose disability information to anyone under any circumstances they may opt not to sign the Application for Accommodation form; however, students need to be aware that implementing accommodations may become unattainable as a result.

Table: Explaining Disclosure Procedures

Information Type	Faculty	Program Accommodation Liaison	Academic Program Staff	Office for Student Access
Disability Documentation, Medical, And Other Records	No	Rarely, would need a legitimate reason to share	No	Yes
List Of Approved Accommodations	Upon request of the student	Yes	If necessary to implement accommodations	Yes
Diagnoses	Not without a signed release from the student	Rarely, would need a legitimate reason to share	Not without a signed release from the student	Yes

DISABILITY STATUS AND USE OF ACCOMMODATIONS SHOULD NOT BE SHARED IN TRANSCRIPTS, ACADEMIC RECORDS, OR IN LETTERS OF RECOMMENDATION

Chapter 7 - Program Accommodation Liaisons (PALs)

The Program Accommodation Liaison (PAL) is the designated person in an OHSU program who is responsible for working directly with OSA to ensure that students with disabilities' needs are addressed within that program. The PAL acts as an "in-house" resource and works directly with faculty and staff to implement accommodations. For an updated list of PALs and their contact information, please refer to the [OSA webpage](#).

Chapter 8 - Contact Information

Office for Student Access

Director: Chennettée Jelleberg

Accommodations Coordinator: Staci Ganje

Accommodations Coordinator: Jon Pielat

Access Coordinator: CG Brothers

Location: 3030 S. Moody Ave., Suite 200 Portland, OR 97201

Mailing Address: 3181 SW Sam Jackson Park Rd., Portland, OR 97239 Mail Code: L624

Phone: (503) 494-0082

Fax: (503) 346-8068

Email: studentaccess@ohsu.edu

[Visit the Student Access Website](#)

Chapter 9 - Issues, Complaints, & Grievances

Clear communication between students, faculty, and the PAL is vital to utilizing accommodations effectively. If you experience problems, issues, or delays in receiving your accommodations please reach out to OSA so we can assist in resolving any concerns.

If you are having difficulty with faculty or an academic program and need to address issues regarding access and/or accommodations please notify OSA and your PAL as soon as possible. ***Do not wait until the end of the term or after you receive a grade to contact us with an issue.***

To the extent possible, reports of issues will be acted upon within 48 business hours. The time it takes to resolve an issue depends on the nature of the issue. Students have the right to file a formal complaint internally or externally at any time.

OHSU Formal Discrimination Complaints

At any time, students may contact the [Office of Civil Rights Investigations and Compliance \(OCIC\)](#) to file a formal discrimination complaint.

OCIC investigations are kept confidential to the extent possible under OHSU policies; and information will only be shared on a need-to-know basis pursuant to OCIC's investigation protocol or as required by law. OHSU prohibits retaliation against individuals who file a complaint or who participate in an investigation. Alleged retaliation will be investigated and may result in disciplinary action, up to and including dismissal.

Office for Civil Rights

The Office for Civil Rights (OCR) enforces Federal civil rights laws that prohibit discrimination on the basis of disability. Students have the right to file a discrimination complaint with OCR at any time. Visit the [OCR website](#) for more information.