



Applies to: Faculty, staff, students, student employees, graduate associates, volunteers, suppliers/contractors, and visitors

Responsible Office

Office of Institutional Equity

POLICY

Issued: 04/01/2000
Revised: 04/15/2022 (minor revision)

The Ohio State University understands that diversity, inclusion, and equity are fundamental to achieving its mission. Therefore, the university is committed to building and maintaining a community that reflects diversity and improves opportunities for all, including all qualified individuals with disabilities. As part of this commitment, policies and procedures will ensure that persons with disabilities are not subjected to discrimination or denied full and equal access to programs offered by the university based on their disability. The university will ensure that persons with disabilities are provided with reasonable accommodations. This commitment is an expectation of our university's shared values, consistent with an intellectual community that celebrates individual differences and diversity, and a matter of law.

This policy will be interpreted in compliance with applicable law and exceptions provided by applicable law. Nothing in this policy is intended to detract from rights guaranteed to bargaining unit members under their current collective bargaining agreements.

Purpose of the Policy

To provide an inclusive and accessible university environment for all qualified individuals with disabilities.

Definitions

Table with 2 columns: Term and Definition. Rows include Disability, Fundamental alteration, Interactive process, Major life activity, Plain language accommodation request, Program, Qualified individual with a disability, Reasonable accommodation, and Substantially limits.



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Term	Definition
Undue hardship	Any accommodation that is substantial or disruptive, or would be a significant cost to the university or fundamentally alter the nature or operation of the program.
Unit	College or administrative unit.
Unit leader	Head of college or administrative unit (e.g., dean, senior vice president, president, provost).

Policy Details

I. Scope

A. This policy applies to all programs offered by the university, including:

1. All employment practices and actions through the entire employee life cycle. This includes, but is not limited to, recruitment, application, hiring, training, disciplinary actions, advancement, transfer and reassignment, and employment status.
2. All educational delivery and practices. This includes but is not limited to recruitment, application, examination and testing, and educational status, and applies to students at all campuses including regional campuses as well as those engaged in distance learning through the university.
3. All health care services and the facilities where such services are provided.
4. All programs over which the university exercises substantial control, which may occur outside of the classroom, campus, or office environment but are a vital part of the university experience (e.g., education abroad, sponsored events, extension programs).
5. All public access to university programs and other offerings. This includes, but is not limited to, athletic events, parking, conferences, and any other event or service open to the public.
6. All facilities and property owned, operated by, or rented by the university.
7. All digital information and services provided by the university, including delivery platforms. Please refer to the [Digital Accessibility policy](#).

II. Administration

A. Unit-level guidelines, procedures, and practices must comply with this policy.

B. Rights and Responsibilities

1. Qualified individuals with disabilities have the right to an equal opportunity to participate in and benefit from all programs offered by the university. Individuals who choose to exercise these rights:
 - a. Are protected under the Americans with Disabilities Act (ADA) when they meet any of the following eligibility criteria:
 - i. Have a physical or mental impairment that **substantially limits** one or more **major life activities**; or
 - ii. Have a history or record of such an impairment or are perceived by others of having such an impairment.
 - b. Have a right to reasonable accommodations.
 - c. Are responsible for initiating the accommodation process in a timely fashion by identifying themselves as needing reasonable modifications to a university environment, policy, or practice and/or needing auxiliary aids and services.
 - d. Are responsible for providing appropriate documentation that confirms a disability and a description of the relevant impacts of that disability when requested by the ADA Coordinator's office or designated office.
 - e. Are expected to actively participate in the identification of reasonable accommodations in a timely fashion.
 - f. Have the same obligation as all program participants to meet and maintain the institution's performance standards, academic and technical standards, and codes of conduct.
 - g. Have a right to be evaluated based on their ability, not their disability.



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- h. Have the right to be informed of procedures for appealing a university decision through internal and appropriate external channels.
2. The university has a responsibility to ensure access to all its programs while maintaining the standards that are fundamental and essential to programs. In meeting these obligations, the university:
 - a. Will inform its program participants about the availability of accommodations.
 - b. May select between equally effective methods of accommodating an individual with a disability.
 - c. Will identify and establish the abilities, skills, and knowledge necessary for entrance and ongoing participation in its programs and evaluate applicants and participants on those bases.
 - d. Will make reasonable modifications to the environment, policy, or practice and/or provide auxiliary aids and services in a timely fashion when an individual's program participation is negatively impacted by their disability in a substantial way.
 - e. May refuse a requested accommodation that fundamentally alters an essential element or program requirement (e.g., academic and technical standards or job responsibilities) or creates an **undue hardship** as determined by the ADA Coordinator's office or designee.
 - f. Will inform the individual of the availability of internal and external appeals processes as applicable.
3. All **plain language accommodation requests** must be referred to the ADA Coordinator's office or designated offices (see Procedure I.B.). Any individual that provides supervision, instruction, human resources support, or controls a program is responsible for making these referrals.
4. Only the ADA Coordinator's office or designated offices may request and review documentation in support of accommodation requests and may refuse a request that is unsupported by documentation. The ADA Coordinator's office or designated offices may also seek permission from the requestor to interact directly with a healthcare provider to determine what accommodations may be reasonable and likely to be effective.

III. Confidentiality and Privacy

- A. The university recognizes the importance of confidentiality and privacy. Information received in connection with establishing and implementing reasonable accommodations, reporting, and resolutions will be treated as private and will only involve individuals whom the university determines are necessary to ensure reasonable accommodations, to provide assistance and resources to parties, to perform other appropriate university functions, or in accordance with applicable law.
- B. The university will maintain as confidential any personal medical information provided, to the extent that maintaining such confidentiality would not impair the ability of the university to provide the accommodations.
- C. All individuals involved in the process should observe the same standard of discretion and respect for everyone involved in the process.

PROCEDURE

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I. Reasonable Accommodations

- A. All accommodations will be evaluated in accordance with the criteria established and defined by state and federal laws including the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, using an **interactive process**.
- B. The ADA Coordinator's office provides oversight and review of the accommodation review process. Reasonable accommodations are initially determined through the interactive process by the designated office in collaboration with the individual with a disability and relevant unit or program. The primary designated offices include:



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1. For student accommodation requests, contact Disability Services in the Office of Student Life at 614-292-3307 or slds@osu.edu.
2. For employee accommodation requests, contact Integrated Absence Management and Vocational Services in the Office of Human Resources at 614-247-6947 or hr-integrateddisability@osu.edu.
3. For patient accommodation requests, contact Patient Experience:
 - a. OSU Harding Hospital: 614-292-9600
 - b. OSU Comprehensive Cancer Center – James: 614-293-8609
 - c. OSU Primary Care Network, Special Care Network, University Hospital, Ross Heart Hospital, Dodd Hall: 614-293-8944
 - d. East Hospital: 614-257-2310
4. For digital accessibility requests, contact the Digital Accessibility Center at 614-292-1760 or accessibility@osu.edu.
5. For all other accommodation requests or general inquiries, contact the ADA Coordinator's office at 614-292-6207 or ada-osu@osu.edu.

II. Training and Assistance

- A. The ADA Coordinator's office, with assistance from other designated offices, provides technical assistance and support in administering this policy to implement the ADA and associated laws and regulations.
- B. The ADA Coordinator's office and other designated offices will provide trainings as appropriate to units on obligations under this policy, the ADA, and associated laws and regulations.

III. Audits

- A. To provide an accessible university infrastructure, the ADA Coordinator's office may audit policies, programs, digital environments, or facilities of the university to determine compliance with this policy.
- B. The participation of **units** and **unit leaders** or designees is essential in completing these audits.
- C. Following an audit, the unit will partner with the ADA Coordinator's office to develop and implement action-oriented directives that will further the principles of this policy, the ADA, and associated laws and regulations, as needed.

IV. Reporting

- A. Any person who has encountered a barrier to access or believes they have been improperly denied the benefit of, or access to, a program, service, or activity may submit a report. To file an ADA or Section 504 report, an individual may contact any of the following:
 1. The ADA Coordinator's office
 - a. Address: 260 Younkin Success Center, 1640 Neil Avenue, Columbus, Ohio 43201
 - b. Phone: 614-292-6207
 - c. Email: ada-osu@osu.edu
 - d. Website: ada.osu.edu
 - e. Online [ADA Report Form](#)
 2. The Office of Institutional Equity
 - a. Phone: 614-247-5838
 - b. Email: equity@osu.edu
 - c. Online reporting form at equity.osu.edu
 3. Individuals, including members of the university community, may submit reports anonymously via the following resources. Note that anonymous reports do not fulfill an employee's duty to report.
 - a. The university's Anonymous Reporting Line via telephone at 866-294-9350 or ohio-state.ethicspoint.com.
 - b. Online reporting form at equity.osu.edu.
- B. Certain members of the university community are required to report all incidents of disability discrimination and harassment as described in the [Non-Discrimination, Harassment, and Sexual Misconduct policy](#).



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- C. The ADA Coordinator’s office establishes standard protocols for responding to and resolving complaints of discrimination or retaliation due to a disability or failures to accommodate.
- D. Retaliation is prohibited by university policy and law. The university will not tolerate retaliation in any form against any individual who makes an allegation, files a report, serves as a witness, assists a complainant, or participates in an investigation of discrimination.

V. Accountability

- A. Individuals who violate this policy will be held accountable for their actions in accordance with applicable university policies or rules (e.g., [Student Code of Conduct](#), [Faculty Rule 3335-5-04](#), [Corrective Action and Involuntary Termination policy](#)).
- B. The ADA Coordinator has oversight of accountability as it relates to this policy and can refer matters to other university offices as appropriate.
- C. Investigations of reports under this policy will be conducted in accordance with the investigatory protocols of the university.
- D. The ADA Coordinator or designee may issue directives when necessary to effectuate this policy.

Responsibilities

Position or Office	Responsibilities
ADA Coordinator's office	<ol style="list-style-type: none"> 1. Provide oversight and review of accommodation review process, and accountability as it relates to this policy. 2. Request documentation in support of accommodation requests, as needed. 3. Provide technical assistance and support in administering this policy, with assistance from designated offices. 4. Provide trainings as appropriate. 5. Establish standard protocols for responding to and resolving complaints of discrimination or retaliation due to disability or failure to accommodate disability. 6. Partner with units to develop and implement action-oriented directives, as needed, following an audit.
Designated offices	<ol style="list-style-type: none"> 1. Request documentation in support of accommodation requests, as needed. 2. Determine reasonable accommodations in collaboration with individuals with disabilities and relevant unit or program. 3. Assist ADA Coordinator's office in providing technical assistance and support in administering this policy. 4. Provide trainings as appropriate.
Individuals that provide supervision, instruction, human resources support, or control a program	Refer plain language accommodation requests to ADA Coordinator's office or designated offices.
Relevant unit or program	Collaborate with individuals with a disabilities and designated offices to determine reasonable accommodations.
Qualified individuals with disabilities	<ol style="list-style-type: none"> 1. Initiate accommodation process as set forth in the policy. 2. Provide appropriate documentation that confirms a disability as set forth in the policy. 3. Participate in identification of reasonable accommodations as set forth in the policy.
Units and unit leaders	Partner with ADA Coordinator's office to develop and implement action-oriented directives, as needed, following an audit.
University	<ol style="list-style-type: none"> 1. Ensure that persons with disabilities are provided with reasonable accommodations as set forth in the policy. 2. Ensure access to all university programs while maintaining fundamental and essential program standards. 3. Inform university program participants about the availability of accommodations. 4. Identify and establish the abilities, skills, and knowledge necessary for entrance and ongoing participation in its programs and evaluate applicants and participants on those bases.



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Position or Office	Responsibilities
	5. Make reasonable modifications to the environment, policy, or practice and/or provide auxiliary aids and services when an individual's program participation is negatively impacted by their disability in a substantial way. 6. Inform individuals of the availability of internal and external appeals processes as applicable. 7. Determine individuals necessary to receive private information in connection with establishing and implementing reasonable accommodations, reporting, and resolutions as set forth in the policy. 8. Maintain as confidential any personal medical information provided, to the extent possible as set forth in the policy.

Resources

Governance Documents

- Affirmative Action & Equal Employment Opportunity policy, go.osu.edu/aaeco-policy
- Code of Student Conduct, trustees.osu.edu/bylaws-and-rules/code
- Corrective Action and Involuntary Termination 8.15 policy, hr.osu.edu/policy/policy815.pdf
- Digital Accessibility policy, go.osu.edu/accessibility-policy
- Non-Discrimination, Harassment, and Sexual Misconduct, go.osu.edu/non-discrimination-policy
- Rules of the University Faculty, 3335-5-04, trustees.osu.edu/bylaws-and-rules/3335-5

Additional Guidance

- Assistance Animals, go.osu.edu/assistance-animals
- Employee Accommodation Overview, go.osu.edu/ada-employees
- Frequently Asked Questions (FAQ), go.osu.edu/ada-faq
- Planning an Accessible Event, go.osu.edu/accessible-events
- Student Accommodation Overview, go.osu.edu/ada-students

Contacts

Subject	Office	Telephone	E-mail/URL
Policy questions, reasonable accommodations, make a report	ADA Coordinator, Office of Institutional Equity	614-292-6207	ada-osu@osu.edu ada.osu.edu
To make a report	Office of Institutional Equity	614-247-5838	equity@osu.edu equity.osu.edu
Anonymous report	Anonymous Reporting Line (does not satisfy employee duty to report)	866-294-9350	ohio-state.ethicspoint.com

History

Issued:	04/01/2000	
Revised:	01/01/2012	
Transferred:	08/01/2019	Transferred from Office of Diversity and Inclusion to Office of Institutional Equity
Revised:	01/25/2022	Policy now incorporates Reasonable Accommodation and Equal Employment for Individuals with Disabilities, which are being retired as standalone policies
Revised:	04/15/2022	Minor revision