

Reasonable Accommodation Policy for Housing

The Cleveland Institute of Art (CIA) recognizes the importance of providing reasonable accommodations in its housing policies and practices where necessary for individuals with disabilities to fully participate in the CIA housing program. This Policy explains the specific requirements and guidelines that govern requests for reasonable accommodation in CIA housing. CIA reserves the right to amend this policy at any time as circumstances require.

Accessibility & Disability Support Services is responsible for evaluating whether to grant or deny requests for reasonable accommodation in CIA housing. In evaluating the request, Accessibility & Disability Support Services will consult with the Office of Student Life and Housing, the Director of Academic Services, and University Health and Counseling Services (UHCS), as necessary, to determine whether the requested accommodation is necessary and reasonable. Individuals with a disability who reside or intend to reside in CIA Housing who believe they need a reasonable accommodation must contact Disability Services.

Requests for reasonable accommodation in CIA housing policies and practices are governed by the following requirements:

1. Requesting a Housing Accommodation

- A. An individual with a disability must complete the "Disability Accommodation Request Form for CIA Housing" (the "Request Form") to request a reasonable accommodation. Copies of the Request Form are available from Disability Services. If the individual requires assistance in completing the Request Form because of their disability, Accessibility & Disability Support Services will provide assistance in completing the form.
- B. CIA will accept and consider requests for reasonable accommodation(s) in CIA housing at any time. The individual making the request for accommodation should complete and provide the Request Form to Accessibility & Disability Support Services as soon as practicably possible before moving into CIA Housing. However, if the request for accommodation is made fewer than 60 days before the individual intends to move into CIA Housing, CIA cannot guarantee that it will be able to meet the individual's accommodation needs during the first semester or term of occupancy.
- C. If the need for the accommodation arises when an individual already resides in CIA housing, they should contact Accessibility & Disability Support Services and complete the Request Form as soon as practicably possible. CIA cannot guarantee that it will be able to meet the accommodation needs during the semester or term in which the request is received.
- D. Absent exceptional circumstances, CIA will attempt to provide a written response

to a reasonable accommodation request within fourteen (14) business days of receiving the information described in paragraph 2 below.

2. Information that May Be Requested for Housing-Related Reasonable Accommodation Requests

Accessibility & Disability Support Services shall limit its requests for information to only the information necessary to verify whether the individual making the request has a disability and/or to evaluate if the reasonable accommodation is necessary to provide the individual an equal opportunity to use and enjoy CIA Housing.

- A. Obvious Disability: If the individual's disability and the necessity for the accommodation are obvious (e.g. an individual with a physical disability using a wheelchair needs an accessible room), the individual need only explain what type of accommodation they are requesting. No verification of disability and/or necessity is required under these circumstances.
- B. Non-Obvious Disability/Necessity
 - i. If the disability is obvious but the need for the accommodation is not obvious, CIA may require the individual to complete the Reasonable Accommodation Verification Form for CIA Housing ("Verification Form") and designate a reliable third party who can verify that the requested accommodation is necessary to provide the individual an equal opportunity to use and enjoy CIA Housing, but may not seek information about the individual's disability.
 - ii. If the disability and necessity for the accommodation are not obvious, Disability Services will require the individual to complete the Verification Form and designate a reliable third party who can verify that the individual has a disability and that the requested accommodation is necessary to provide the individual an equal opportunity to use and enjoy CIA Housing.
 - iii. A reliable third party is a licensed provider who is familiar with the individual's disability, the individual's needs, and the necessity for the requested accommodation and has the authority/expertise to recommend accommodations.

Absent exceptional circumstances, within seven (7) business days of receiving the completed Verification Form from the third-party, Accessibility & Disability Support Services, after consultation with the providing source or agency, Office of Student Life and Housing, the Director of Academic Services, and Accessibility & Disability Support Services, will determine if the accommodation is necessary because of a disability to provide the individual an equal opportunity to use and enjoy CIA Housing.

If the third party returns the Verification Form without sufficient information for Accessibility & Disability Support Services to determine whether an accommodation is necessary, Disability Services will inform the individual in writing of the verification's insufficiency and may request additional information, including speaking directly with the individual supplying the third-party verification, within seven (7) business days of receiving the verification.

The individual making the request for accommodation must cooperate with Accessibility & Disability Support Services in a timely manner in providing all information needed to determine whether the requested accommodation is necessary. Any delay in obtaining this information will consequently delay resolution of the accommodation request.

3. Determination of Reasonableness

- A. Accessibility & Disability Support Services may deny the requested accommodation if it is unreasonable. Accessibility & Disability Support Services shall consult with Student Life and Housing, and others as appropriate, to determine if implementing the requested accommodation is reasonable.
- B. An accommodation is unreasonable if it: (1) imposes an undue financial and/or administrative burden; (2) fundamentally alters university housing policies; (3) poses a direct threat to the health and safety of others or would cause substantial property damage to the property of others, including CIA property; and/or (4) is otherwise unreasonable to the operation of CIA.

4. Approval of Accommodation

- A. If Accessibility & Disability Support Services determines a requested accommodation is necessary and is not unreasonable, it will contact the individual, in writing, within seven (7) business days of its determination, to arrange a meeting to discuss the implementation of the accommodation.

5. Denial of Accommodation/Appeal

- A. If Accessibility & Disability Support Services determines a requested accommodation is necessary but unreasonable, Accessibility & Disability Support Services will contact the individual, in writing, within seven (7) business days of its determination and engage in an interactive process with the individual to determine if there are alternative accommodations that might effectively meet the individual's disability-related needs.
- B. If the individual is unwilling to accept any alternative accommodation offered by Accessibility & Disability Support Services or there are no alternative accommodations available, Accessibility & Disability Support Services will provide a verbal explanation and written notification to the individual of the denial,

the reasons for the denial, the right to appeal the decision, and the procedures for that appeals process. The notification shall be in writing and made within seven (7) business days of the notification from the individual of his/her unwillingness to accept any of the alternative accommodations offered or the determination that there are no alternative accommodations available.

- C. All appeals are reviewed by the Dean of Students. If the appeal is denied, the Dean of Students shall provide written notification of the denial to the individual and a written explanation with all of the reasons for the denial. If the appeal is approved, Accessibility & Disability Support Services will initiate coordinated efforts necessary to implement the accommodation.
- D. An individual may also use the grievance procedure provided under the general CIA antidiscrimination policies. This grievance procedure can be found in the Student Handbook.

6. Confidentiality and Recordkeeping

- A. In processing requests for reasonable accommodations, CIA will take all steps required by federal, state, and/or local law to protect the confidentiality of any information or documentation disclosed in connection with the requests. Such measures may include limiting access to such information to individuals specifically designated to determine and implement requests for reasonable accommodations, who will disclose the information only to the extent necessary to determine whether to grant the request, determine if the request is unreasonable, and implement any request granted, keeping all written requests and accompanying documentation in a secure area to which only those designated individuals have access, except as otherwise required by law.

7. Non-retaliation Provision

CIA will not retaliate against any individual because that individual has requested or received a reasonable accommodation in CIA housing.