



Hackensack Meridian
School of Medicine

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Area HMSOM Student
Affairs &
Wellbeing

Student Reasonable Accommodation Request Policy

Scope:

The Hackensack Meridian School of Medicine (HMSOM) is committed to ensuring a supportive environment for students with disabilities by providing the opportunity for full participation in the HMSOM community. HMSOM complies with federal and state laws prohibiting discrimination against any applicant or enrolled student on the basis of disability, in accordance with its obligations under the Americans with Disabilities Amendment Act of 2008 and Section 504 of the Rehabilitation Act of 1973.

Applicability:

All members of the HMSOM community.

Policy Statement:

The Doctor of Medicine (M.D.) degree is a broad, undifferentiated degree attesting to general knowledge in medicine and the basic skills required for the practice of medicine. Essential abilities and personal characteristics required for completion of the M.D. degree consist of certain minimum physical and cognitive abilities, and sufficient mental and emotional stability to assure that candidates for admission, promotion, and graduation are able to complete the entire course of study and participate fully in all aspects of medical training, with or without reasonable accommodation.

The M.D. degree is premised on meeting the HMSOM Technical Standards, as described in Appendix A with or without a reasonable accommodation. All candidates for admission must fulfill the minimum requirements for admission, and all candidates for the M.D. degree must complete all required courses and clerkships.

Qualified students with a disability may apply for reasonable accommodations to ensure equal access to the HMSOM educational program. For the purposes of reasonable accommodations, a disability is

generally defined as a physical or mental impairment that substantially limits an individual's major life activities, a record of such an impairment, or being regarded as having such an impairment.

Reasonable accommodations are modifications to the HMSOM course of study to designed provide equal access to students or applicants with disabilities. A reasonable accommodation will not, however, waive components of the HMSOM program requirements.

Seeking Accommodations:

Qualified students with a disability seeking accommodations must identify themselves to the HMSOM Student Accessibility Services. This is part of the HMSOM Office of Students Affairs and Wellbeing. Student Accessibility Services is responsible for collecting documentation to support a student's request, to evaluate a student's request and to grant reasonable accommodations when appropriate.

The Director of Student Accessibility Services is responsible for approving reasonable accommodations on a case-by-case basis. Reasonable accommodations are based on the documentation presented and discussions between the student and Director of Student Accessibility Services, but are not necessarily the student's preferred accommodation.

The reasonable accommodation process addresses both the didactic and clinical settings beginning with Phase 1 of students' instruction.

Student Accessibility Services' records are confidential and will not be considered part of the student's academic record. The documents received from a student through the application process, including the student's medical information, will be maintained in confidence. No information about a student's disability or diagnosis will be shared without the student's express written consent. Although the Family Educational Rights and Privacy Act (FERPA) may allow sharing of information in very limited situations and on a need to know basis, the Director of Student Accessibility Services will, to the extent practicable, maintain confidentiality of all discussions with students seeking accommodations.

Step 1. Register with Student Accessibility Services

Students or prospective students seeking an accommodation for the first time should submit a Registration for Accommodation form to Student Accessibility Services in advance of the start of the start of the academic Phase as possible. We suggest this be submitted by June 1. This initial registration will identify your name, contact information, disability information, sought accommodations or auxiliary aids/services, and prior academic accommodation history. Students will also submit authorization for HMSOM to receive information from the student's health care provider.

Students may obtain the Registration for Accommodation form on the Student Accessibility Services website, by picking up a copy of the registration, or by emailing a request for a copy of the registration form to the Director of Student Accessibility Services at (Grace.Bandoh@hmhn.org). Students submitting a Registration for Accommodations form must also submit recent documentation from their treating professionals to support their request. In general, HMSOM considers "recent" documents those prepared within the last 3 calendar years for the purpose 3 of the request, but HMSOM will also consider older documentation as part of the

overall decision-making process.

Documentation from a psychologist, licensed physician and/or other qualified professional is required to support the request for a reasonable accommodation. The documentation submitted should detail how the student's condition limits a major life function as it relates to the educational process. Relevant educational, developmental or medical history should also be included. Descriptions of the testing used or techniques used to reach diagnosis should be included, as should all scores for all test. Standard scores are preferred but not required. Documentation should also include the evaluator's qualifications, including his/her name, title, credentials and licensing information (including the State), and specialization. Professionals are expected to have training to assess and render diagnosis for the disability addressed in the documentation. Documentation should also include the treating professional's suggested reasonable accommodations and an explanation for the recommendation.

HMSOM offers the following types of documentation as examples of the types of documentation be submitted in connection with a request for reasonable accommodation:

- a. **Learning Disorders.** Documentation should detail students' aptitude, achievement and information processing skills. Testing which addresses these issues may include: the Wechsler Adult Intelligence Scale, Woodcock-Johnson IV, Woodcock Reading Mastery Tests, revised, or Learning Efficiency Test- II or other similar assessments. Dates of treatment should be indicated (including the last date), as should diagnosis, prognosis, the limits on major life functions caused by the disorder, determinations ruling out other conditions, and side effects caused by any medication prescribed (if relevant to the requested accommodation). Any testing documentation must also meet the general guidelines detailed above.
- b. **Psychological Disorders.** Documentation should meet the general guidelines detailed above to confirm the existence of a diagnosable mental disorder, as contemplated by the DSM-V, but should also provide information about: treatment dates (including last treatment date), prognosis, the limitations on major life functions caused by the disorder, determinations ruling out other conditions, side of effects caused by any medication prescribed (if relevant to the specifically requested accommodation).
- c. **Physical/Mobility Impairments.** Documentation should include the general guidelines detailed above. It should also include treatment dates (including last treatment date), diagnosis/prognosis (as appropriate), functional limits and whether those functional limitation are mitigated by treatment, side effects of treatment (if relevant to the specifically requested accommodation request).
- d. **Sensory Impairments.** Documentation should include the general guidelines listed herein, but should also include: diagnosis/prognosis, treatment dates (including last treatment date), and the name and result of any tests administered to determine the level of impairment.
- e. **Other.** For disabilities that do not fall within each of these categories, students should submit documentation from a treating professional that meets the general guidelines as described above.
- f. **504 Plans or other Accommodation Documentation.** The most recent 504 Plan or other accommodation documentation issued to the student may be submitted for consideration. HMSOM notes that while a last issued 504 Plan may not include the requisite diagnostic or

testing information to determine whether the student is eligible for a reasonable accommodation, it often provides useful information about reasonable accommodations which have proven successful.

The documentation listed above is illustrative. HMSOM will review and consider any documentation presented to the Director of Student Accessibility Services in connection with a student's request for reasonable accommodations. However, the Director of Student Accessibility Services will not grant accommodations unless the minimum documentation requirements detailed herein are met.

Step 2. Evaluation of Registration

Evaluation of Registration for Accommodation forms are generally completed in the order in which they are received. To ensure reasonable accommodations are in place before the start of the phase, students are encouraged to submit their Registration for Accommodations by June 1, or as far before the start of Phase as possible.

The Director of Student Accessibility Services will complete an initial evaluation of the request with respect to the completeness of the documentation submitted. Usually, this review takes about 2 weeks. If no additional information is needed to assess preliminary eligibility, Student Accessibility Services will contact the student to schedule a meeting to discuss the pending reasonable accommodation request. This initial contact typically happens within 24 hours of the completion of the application's review. However, meetings are scheduled based on mutual availability.

If the registration information is incomplete, the Student Accessibility Services will notify the student of the missing document(s) and ask the student to submit the document(s) to complete the registration process. Incomplete submission of registration information may delay the time in which a meeting with the Director of Student Accessibility Services is scheduled. Best efforts are made to complete a supplemental review within 1 week of the receipt of additional documentation. Once the registration information is complete, Student Accessibility Services will contact the student to schedule a meeting to discuss the pending reasonable accommodation request. This initial contact typically happens within 24 hours of the completion of the application's review. However, meetings are scheduled based on mutual availability.

Last-minute submission of documentation may result in delays in consideration of requested accommodations and support services. Because reasonable accommodations are approved prospectively, students are encouraged to apply early to ensure that they are approved and in place for the start of Phase.

Reasonable accommodations are not approved until a student receives a Letter of Accommodation.

Students whose documentation did not establish an entitlement to reasonable accommodation will be notified, in writing, that their request was denied. Students may appeal this determination by following the appeal process outlined in Appeal section described in Appeal Process provisions of this policy, below.

To facilitate the reasonable accommodation process, Student Accessibility Services reserves the

right to schedule meetings with students whose documentation is incomplete or does not appear to meet the requirements to establish entitlement to a reasonable accommodation.

Step 3. Meeting with the Director of Student Accessibility Services

The meeting with the Student Accessibility Services is the time during which reasonable accommodations will be explored by the student and Director of Student Accessibility Services. Although the HMSOM is sensitive to the demands of the medical school program, sometimes it may require multiple meetings to establish reasonable accommodations.

During this meeting, the student and Director of Student Accessibility Services will review the student's individualized needs. This includes, but is not limited to, reviewing recommended reasonable accommodations submitted by the student's treating professional, discussing previously granted reasonable accommodations (from any point in the student's educational career), and soliciting information from the student about which prior accommodations, in the student's opinion, have worked best.

The Director of Student Accessibility Services will, to the extent practicable, maintain the confidentiality of these discussions. The Director of Student Accessibility Services may, however, collaborate with other members of the faculty and staff about the ability to implement types of accommodations (i.e. speaking with IT to facilitate purchase of software). Unless written consent is obtained, the student's identity and diagnosis will not be disclosed during these collaborations.

Approved reasonable accommodations are modifications that allow students equal access to the HMSOM educational program. Typically, the HMSOM will not provide accommodations designed for a student's personal care needs. Reasonable accommodations are granted on a case by-case basis based on the student's specific needs.

Common examples of reasonable accommodations in an educational setting, however, include, but are not limited to: • Note-takers/scribes • Software Readers/Human readers • Alternative examination locations • Extended times for examinations • Sign language interpreters • Priority seating • Written materials in accessible format(s).

The grant of a reasonable accommodation does not waive the HMSOM Technical Standards. In the event a reasonable accommodation is requested that fundamentally alters the nature of the HMSOM Technical Standards, alternative reasonable accommodations will be explored.

Step 4. Approval

Following student meeting(s) with the Director of Student Accessibility Services, approval of reasonable accommodations will be made through a Letter of Accommodation.

Letters of Accommodation are communications from the Director of Student Accessibility Services detailing the provision of approved reasonable accommodations for an individual student. The Letters of Accommodation do not include information about a student's diagnosis, and instead detail the student's entitlement to modifications in the academic or clinical settings.

The Letter of Accommodation will be provided to the student from the Director of Student

Accessibility Services. Only the Director of Student Accessibility Services may approve student reasonable accommodation requests.

Step 5. Implementation

After the Letter of Accommodation is issued to the student, the student will provide consent before the letter is shared with the Assistant Dean of Medical Education so that the approved accommodations may be implemented. The accommodations are not effective until the Letter of Accommodation is provided to the Assistant Dean of Medical Education.

Students should also provide a copy of the Letter of Accommodation to their Course Director(s) and arrange a time to meet with the Course Director(s) to discuss the approved accommodations.

In some instances, the reasonable accommodations may be put in place as quickly as within 72 hours of receipt of the Letter of Accommodation (i.e. preferential seating). Other reasonable accommodations included in the Letter of Accommodation may take more than 72 hours to implement, such as when equipment needs to be ordered or testing arrangements must be made, but the accommodations will be put in place as quickly as possible.

If the Course Director or Assistant Dean of the Office of Medical Education has questions about the reasonable accommodations granted (i.e. how best to implement) those questions should be directed to the Director of Student Accessibility Services, not the student. Faculty members should not question students about the nature of their disability.

Faculty members may not alter the reasonable accommodations granted by the Director of Student Accessibility Services and may not grant students reasonable accommodations that are not included in the Letter of Accommodation.

Course Directors should include a statement about the availability of Student Accessibility Services on their syllabi. The statement should convey that the HMSOM is committed to providing equal access to the educational program and direct students to Student Accessibility Services.

Step 6. Changes to Approved Reasonable Accommodations

The reasonable accommodations contained in the Letter of Accommodation remain in place until the end of Phase or until a new Letter of Accommodation is received, whichever is first.

Nothing in this policy prohibits a student from seeking a revised Letter of Accommodation prior to the end of Phase. In the event a student believes equal educational opportunity will result from new or amended reasonable accommodations, the student should contact Student Accessibility Services to schedule an appointment with the Director of Student Accessibility Services. The Director of Student Accessibility Services and the student will meet to review the requested change, the reason(s) for the change(s), supporting documentation to support the requested change and any other relevant information. As appropriate, the Director of Student Accessibility Services may approve new or changed reasonable accommodations and present the student with an updated Letter of Accommodation.

Step 7. Renewal

Students with approved reasonable accommodations must renew their request each academic Phase on the Renewal of Accommodation request form. HMSOM recommends that renewals be filed by June 1 prior to the start of the student's next Phase. The Renewal of Accommodation request form is available on the Student Accessibility Services website, in hardcopy for the Student Accessibility Services or may be obtained by emailing the Director of Student Accessibility Services at (Grace.Bandoh@hmhn.org). If the renewal is submitted and the supporting documentation is less than 3 years old at the time of renewal request, and no changes are sought, no supporting documentation must be submitted. If the documentation is more than 3 years old at the time of renewal request, new supporting documentation as outlined above in Step 1 should be submitted.

Students seeking renewal and updates to their reasonable accommodations should submit supporting documentation for any changes thereto.

Appeal Procedure

A student has the right to appeal any reasonable accommodation decision by filing a written explanation and petition for reconsideration. The Director of Student Accessibility Services will provide students seeking to appeal with a form upon which to submit their appeal. The Appeal Form is available on the Student Accessibility Services website, in hardcopy for the Student Accessibility Services or may be obtained by emailing the Director of Student Accessibility Services at (Grace.Bandoh@hmhn.org).

This form, which will be provided to the student by the Director of Student Accessibility Services, must be submitted to the Director no later than five (5) working days from the date of the decision (holidays excluded). The Director of Student Accessibility Services will first attempt to resolve the issue with the student and the appropriate individuals or resources within HMSOM.

If the Director of Student Disability Services is unable to resolve the matter in the five (5) working days following receipt of the Appeal, he/she will present the student's written petition to the Associate Dean of Student Affairs and Wellbeing on the next business day with the Director's outline of attempted resolution approaches. In adherence to confidentiality policies, the Director of Student Disability Services will obtain the student's written permission (such permission not to be unreasonably withheld) prior to distributing primary clinical documentation to the Associate Dean of Student Affairs and Wellbeing, if relevant to the petition.

The Senior Associate Dean of Student Affairs and Wellbeing, or her designee will provide the student with a decision within ten (10) working days after having received the petition from the Director.

Testing Accommodations

Reasonable accommodations during HMSOM administered examinations, quizzes and other assessments may be approved on a case by case basis. Approved examination, quiz or assessment reasonable accommodations will be detailed in the student's Letter of Accommodation.

Common reasonable accommodations for examinations, quizzes and other assessments include additional time, quiet room access, or break times.

The testing provided by HMSOM require individualized programming for each student's specific accommodations. Programming accommodations approved by the Letter of Accommodation requires advanced preparation, particularly in light of the security of HMSOM's examinations.

Students seeking accommodations for examinations, quizzes and other assessments are encouraged to apply as far in advance of each Phase by following the Steps outlined in this policy. If a request for reasonable accommodations is made within 1 week of the scheduled examination, quiz or assessment, best efforts will be made to evaluate and implement reasonable accommodations in time for the scheduled date. However, immediate review and implementation cannot be guaranteed.

Students are notified by Student Accessibility Services about access to their examination, quiz or assessment in advance. Only the Student Accessibility Services may approve reasonable accommodations for examinations, quizzes or assessments.

Temporary Accommodations

Students with temporary conditions may also qualify for reasonable accommodations. Students seeking temporary accommodations due to a temporary condition (i.e. broken leg) should submit a Temporary Accommodation request form. Sometimes, accommodations are granted even if the condition does not qualify as a disability. The form is available on the Student Accessibility Services website, in hardcopy from Student Accessibility Services, or may be obtained by emailing the Director of Student Accessibility Services at (Grace.Bandoh@hmn.org). Accessibility@HackensackMeridian.org.

Temporary accommodation requests should be submitted with documentation from a treating health care professional detailing the nature of the condition, expected duration, and the suggested reasonable accommodations. In general, the Director of Student Accessibility Services will respond to a Temporary Accommodation requestor within 48 hours to discuss the request and determine which, if any, requested accommodations will be put in place. If temporary accommodations are granted, the Director of Student Accessibility Services will issue a Letter of Accommodation. Implementation will be in accordance with Step 5 above.

APPENDIX A

Technical Standards for Admission, Progression and Graduation

The technical standards for the HMSOM are based on the essential cognitive, emotional, and physical demands required to succeed in the curriculum, and the ability to perform as a successful physician. The HMSOM recognizes that certain minimum technical standards must be met by candidates for admission and all current students at the HMSOM (hereinafter designated as candidates for the M.D. degree) to provide for safe and effective participation in the medical education program and to uphold the integrity of HMSOM's curriculum. The curriculum of the HMSOM has been designed to provide a general professional education leading to the M.D. degree and to prepare undifferentiated students to enter

graduate medical training in a wide variety of medical specialties and subspecialties. All candidates for the M.D. degree should possess sufficient intellectual capacity, physical ability, emotional and psychological stability, interpersonal sensitivity, and communication skills to acquire the scientific knowledge, interpersonal and technical competencies, professional attitudes, and clinical abilities required to pursue any pathway of graduate medical education, and to enter the independent practice of medicine. All candidates should be aware that the academic and clinical responsibilities of medical students may, at times, require their presence during day, evening, and nighttime hours, seven days per week. Candidates should be able to tolerate physically taxing workloads and to function effectively under stress. Therefore, achievement of specific technical standards in six core domains (general functions, communication, cognitive ability, observation, motor, behavioral/social attributes) is necessary for admission, progression, and graduation from any clinical program in HMSOM. These standards are commensurate with AAMC publications, Section 504 of the Rehabilitation Act, and the American Disabilities Act. HMSOM will consider for admission any candidate who meets its academic and nonacademic criteria and who demonstrates the ability to perform the skills listed in this document, with or without reasonable accommodations, consistent with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. Candidates for the M.D. degree will be assessed at regular intervals on the basis of their academic and non-academic abilities, with or without reasonable accommodations. An accommodation is not reasonable if it poses a direct threat to the health or safety of patients or others, if making it requires a fundamental alteration in an essential element of the medical education program, or if it poses an undue burden. HMSOM has established the following technical standards for admission to, retention in, and graduation from the M.D. program:

All candidates for admission must fulfill the minimum requirements for admission, and all candidates for the M.D. degree must complete all required courses and clerkships.

All candidates for admission and all candidates for the M.D. degree should possess sufficient physical, intellectual, interpersonal, social, emotional, psychological, and communication qualities as outlined below:

General Functions

Candidates should possess the personal qualities of integrity, empathy, concern for the welfare of others, interest, and motivation. They should possess the emotional and psychological health required for the full use of their intellectual abilities; the exercise of good judgment; the prompt completion of all responsibilities associated with the diagnosis and care of patients; and the development of mature, sensitive, and effective relationships with patients, patients' families, and professional colleagues. They must be able to adapt to changing environments, to be flexible, and to function in the face of ambiguities inherent in the clinical situation. Candidates should be able to accurately and consistently perceive, integrate, and interpret visual, hearing, smell, and touch sensations in order to gather significant information needed to effectively evaluate patients. The candidate must have the capability to communicate and to receive information, and to accurately interpret such, verbally, nonverbally, and in writing. They must be able to respond promptly to urgent situations occurring during clinical education experiences to preserve the health and safety of patients, clients, visitors, staff, or others in health care settings. The candidate should not interfere with the capabilities of other members of the health care team to appropriately provide care to patients.

Communication

The candidate must have the ability to effectively communicate verbally, non-verbally, and in writing, with a wide variety of individuals and groups. This includes the ability to elicit, receive, and accurately interpret information from others; to collect, document, and convey relevant information to others; to understand and use health care terminology; and to comprehend and follow directions and instructions. The candidate must be able to read, write, comprehend, and speak the English language, and to communicate accurately and effectively with patients, significant others, health care workers and other professionals in health care settings, as well as with instructors, supervisors, classmates, and various health or educational team members in both clinical and classroom settings. In addition, the candidate must be able to document accurately in patient records, present information in a professional and logical manner, and appropriately provide patient counseling and instruction to effectively care for patients or clients and their families.

Cognitive Ability

The candidate must have the capacity to develop and refine critical thinking and problem-solving skills that are crucial for safe and effective medical practice. These processes involve capabilities to measure, quantify, calculate, question, analyze, conceptualize, reason, integrate, and synthesize information in order to make timely decisions reflecting sound clinical judgment and to take appropriate clinical actions. Candidates must additionally be able to find and utilize research-based evidence; to learn from other individuals; to comprehend, integrate, and apply new information; to make sound clinical decisions; and to communicate outcomes verbally and in writing. Candidates should be able to make measurements, calculate, and to reason; to analyze, integrate, and synthesize data to problem solve and ultimately make logical diagnostic and therapeutic judgments. Candidates should be able to comprehend three-dimensional relationships and to understand the spatial relationships of structures. Candidates should be able to integrate rapidly, consistently, and accurately all data received by whatever sense(s) employed.

Observation

The candidate must be able to collect, use, and interpret information from diagnostic and assessment procedures and tools (e.g., sphygmomanometer, pulse oximeter, weight scales, stethoscope/hearing impaired stethoscope, otoscope, ophthalmoscope, and reflex hammer), and from all other modes of patient assessment in the context of laboratory studies, medication administration, and all other patient care activities. In addition, the candidate must be able to document these observations and maintain accurate records. Candidates must be able to observe demonstrations, collect data, and participate in experiments and dissections in the basic sciences, including, but not limited to, cadaver dissection, demonstrations in animals, microbiologic cultures, and microscopic studies of microorganisms and tissues in normal and pathologic states.

Motor

The candidate must have gross and fine neuro-motor capability and dexterity, with sufficient coordination, to perform thorough physical examinations utilizing techniques including inspection, palpation, percussion, auscultation, and/or other diagnostic maneuvers; perform or assist with

procedures and treatments; use syringes and needles; administer medications by oral, otic, ophthalmic, rectal and parenteral routes; implement other therapeutic interventions including but not limited to sterile procedures, isolation, airway maintenance, cardiopulmonary resuscitation, operation of diagnostic and therapeutic medical equipment, the application of pressure to stop bleeding, the suturing of simple wounds to assist in surgical procedures and in the performance of simple obstetrical maneuvers. Such actions require coordination of both fine and gross muscular movements and equilibrium. Candidates should have sufficient exteroceptive sense (touch, pain, and temperature), proprioceptive sense (position, pressure, movement, stereognosis, and vibratory), and motor function to carry out the requirements of the physical 12 examination. The candidate must have both physical and mental endurance to adapt to extended periods of sitting, standing, moving, and physical exertion required for safe performance in clinical and classroom settings. The candidate must be capable of moving within and between clinical treatment environments without compromising the safety of others.

Behavioral and Social Attributes

The candidate must possess the capacity to communicate effectively, respectfully, and with cultural competency, with all individuals he/she encounters, and to demonstrate behaviors associated with compassion, respect and concern for others, integrity and ethical comportment, sound clinical judgment, and accountability for his/her responsibilities and actions. They must be able to accept the supervision of an instructor and/or preceptor, to accept constructive criticism or feedback, and to modify behavior based on feedback. The candidate must demonstrate critical thinking in making sound clinical judgments, have the capacity for flexibility, and demonstrate the ability to adapt quickly to rapidly-changing situations and environments and/or to uncertain circumstances. They must have the capacity to correctly judge when assistance is required and seek appropriate assistance in a timely manner. The candidate must be able to function cooperatively and efficiently with others and must have the capacity to develop and utilize conflict resolution processes when necessary. Candidates should possess the personal qualities of integrity, empathy, concern for the welfare of others, interest, and motivation. They should possess the emotional and psychological health required for the full use of their intellectual abilities, the exercise of good judgment, and the prompt completion of all responsibilities associated with the diagnosis and care of patients. As medical education involves exposure to a wide variety of stressful situations, the candidate must be able to function effectively in stressful situations in both the classroom and clinical settings.

Approval Signatures

Step Description	Approver	Date
Dean	Jeffrey Boscamp: SVP Sch of Med Dvlpmnt Co-CAO	06/2022

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