



American  
Jewish  
University

Procedures on  
Accommodations for  
Students with Disabilities

August 2025

**AMERICAN JEWISH UNIVERSITY**  
**PROCEDURES ON ACCOMMODATIONS FOR STUDENTS WITH DISABILITIES**

**Contents**

1.	Overview .....	2
2.	Procedural Scope and Jurisdiction.....	2
3.	Responsibilities and Extensions.....	2
4.	Communications from the University .....	3
5.	The Interactive Process Between the University and the Student .....	3
	A. General Information.....	3
	B. Requesting and Implementing Accommodations .....	4
	C. Review and Determination of Accommodations Request.....	6
	D. Timeliness.....	7
	E. Checking-In, Modifications, and Additional Accommodations.....	8
	F. Continuance of Current Approved Accommodations .....	8
6.	Temporary and Episodic Impairments .....	9
7.	Class Attendance.....	9
8.	Privacy and Recordkeeping.....	10
9.	Grievances Related to Students’ Disability Accommodations.....	10
	A. General Information.....	10
	B. Grievance Submission .....	11
	C. Informal Resolution .....	12
	D. Formal Resolution .....	13
	E. Right to Pursue External Complaints.....	16
	F. Prohibition Against Retaliation.....	17

## 1. Overview

In accordance with Section 504 of the Rehabilitation Act of 1973 (“Section 504”), the Americans with Disabilities Act of 1990 (“ADA”), other applicable federal, state, and local statutes, and American Jewish University’s [Policy on Accommodations for Persons with Disabilities](#) (“Disability Accommodations Policy”), American Jewish University (“AJU” or “the University”) provides Procedures on Accommodations for Students with Disabilities (“Student Accommodations Procedures”). The Student Accommodations Procedures apply to students’ requests for accommodation based on Disability status.

Questions about the Student Accommodations Procedures should be directed to the attention of the University’s Section 504 Coordinator (“504 Coordinator”), whose contact information is listed below:

**Elizabeth (Liz) Honig**  
**Section 504 Coordinator**  
**15600 Mulholland Drive**  
**Los Angeles, CA 90077**  
**Phone: 312-382-3113**  
**Email: [Elizabeth.Honig@aju.edu](mailto:Elizabeth.Honig@aju.edu)**

## 2. Procedural Scope and Jurisdiction

The Student Accommodations Procedures define the procedures used to accommodate students with disabilities, including prospective students with disabilities. These Procedures also describe the resolution process for any grievances made by students and prospective students about the accommodations request process including the provisioning of accommodations and services.

The Student Accommodations Procedures are effective December 9, 2024, and are not retroactive. The University may revise these Procedures from time to time.

The capitalized terms in these Procedures are defined in Section 5 of the [Disability Accommodations Policy](#). For the purpose of the Student Accommodations Procedures, Working Days are defined as Monday through Friday, excluding all official holidays or campus closures.

Reasonable Accommodations do not apply retroactively to issues that occurred before a student with a Disability engaged in the Interactive Process. The University is not obligated to provide Reasonable Accommodations until a student with a Disability establishes their Disability and the need for accommodations through the Interactive Process.

## 3. Responsibilities and Extensions

Please refer to Section 6 of the [Disability Accommodations Policy](#) for the 504 Coordinator's and requesting student's responsibilities pertaining to the Student Accommodations Procedures.

Certain provisions of the Student Accommodations Procedures set forth time limits by which events shall be completed and decisions made. The 504 Coordinator retains the authority to extend these time limits, both for students and for the University, for good cause and based on the circumstances of each individual case. In such cases, the 504 Coordinator shall notify the student of the revised time limits. In all cases, the 504 Coordinator shall strive to provide responses in a timely manner.

#### **4. Communications from the University**

Communication from the University to requesting students will be sent to students' designated AJU email address. If the student does not have an AJU assigned email address, the student must provide a personal email address in writing to the 504 Coordinator. Communications to prospective students will be sent to the prospective students' designated personal email address.

#### **5. The Interactive Process Between the University and the Student**

##### A. General Information

1. Students are required to self-identify as a Person with a Disability and affirmatively make a request for an accommodation to the 504 Coordinator. Once a request has been made, the 504 Coordinator will engage in an Interactive Process with the student to determine what, if any, Reasonable Accommodations are available.
2. Students should not make accommodation requests directly to AJU faculty or staff unaffiliated with the 504 Coordinator; if this occurs, AJU faculty or staff will refer students to the 504 Coordinator. Similarly, AJU faculty or staff should not provide accommodations to students that have not been approved by the 504 Coordinator through the Disability Accommodations Policy and these Procedures. All AJU faculty and staff are expected to implement approved accommodations.
3. A student requesting an accommodation based on a Disability must have a Disability covered by law and be qualified with or without Reasonable Accommodation. The University is only obligated to provide *Reasonable Accommodations*, and it is not required to fundamentally alter its programs to accommodate a student. Thus, not all accommodation requests will necessarily be granted. The University may provide alternative accommodations instead.
4. Accommodation requests and supporting documentation are reviewed on an individualized, case-by-case basis. As such, approved accommodations may vary from person to person and from environment to environment for students with the same Disability diagnosis. Documentation of a specific Disability does not translate directly into specific accommodations.
5. During the Interactive Process, appropriate University employees including faculty and staff may be consulted to determine the appropriateness of requested accommodations and how best to implement certain

accommodations.

6. The Interactive Process requires an assessment of the functional impact of a student's Disability and identification of Reasonable Accommodations so the student has the opportunity to participate in University programs and activities in ways that are equal to that afforded others.
7. During the Interactive Process, students can suggest, recommend, or request possible accommodations they feel will provide equal access to the curriculum. As part of the Interactive Process, the University can object to a recommended accommodation if it presents a Fundamental Alteration, cause Undue Hardship, or jeopardize the health or safety of others.
8. Temporary accommodations may be available while the 504 Coordinator engages in the Interactive Process to determine whether ongoing accommodations is appropriate and, if so, what Reasonable Accommodations are needed. However, temporary accommodations do not reflect a determination that ongoing accommodation will be granted and/or what Reasonable Accommodations are appropriate, nor do they create an obligation on the part of the University to continue accommodating the student.

#### B. Requesting and Implementing Accommodations

A Reasonable Accommodation includes the provision of certain Auxiliary Aids and Services and/or modifications of policies, practices, or procedures that will allow the student with a Disability to meet the requirements of the University's course or program. The University will not permit accommodations that would- present a Fundamental Alteration, such as fundamentally altering academic requirements that are essential to the instruction pursued by a student or to any directly related licensing requirements, would cause Undue Hardship for the University, or would jeopardize the health or safety of others.

Examples of Reasonable Accommodations may include, but are not limited to, extended time for testing; break time during instruction; preferential seating; large print materials; assistive technology; ergonomic or adaptive equipment; reduced distraction exam room. This list is not exhaustive and students should feel free to request other accommodations for consideration by the University.

Students who seek to obtain Reasonable Accommodations must:

1. Contact the 504 Coordinator to schedule an intake meeting with the 504 Coordinator. The intake meeting may take place virtually (online via Zoom), or in-person at AJU's physical site. In most cases, the intake meeting will be held within ten (10) Working Days of the student's request for a meeting.
2. Prior to, during, or following the scheduled intake meeting, provide the 504 Coordinator with appropriate supporting documentation of the student's Disability or disabilities as defined by the Disability

Accommodations Policy. Students should provide supporting documentation in a timely manner.

3. Supporting documentation must include a medical evaluation completed within the last three (3) years.

The medical evaluation must be on official letterhead including the printed name, signature, title, professional credentials and license number of the evaluator along with the address, telephone, and (if applicable) fax number(s). The medical evaluation must be provided by a licensed, credentialed, and qualified medical healthcare professional who has no prior personal or familial relationship with the individual being evaluated. The evaluator must be the "subject matter expert" in the area for which they are providing an evaluation/recommending accommodations.

The medical evaluation should include all of the following:

- a. An identification of the Disability, including the diagnosis, history of onset, and methodologies used to determine the diagnosis; and
- b. The current functional impact of the condition as well as a description of the current functional limitations as they relate to the major life activity impacted by said diagnosis; and
- c. Recommended accommodations with the rationale for each recommended accommodation. Such accommodation recommendations should be appropriate for an institute of higher education.

Specific accommodations being recommended by a professional do not guarantee that those accommodations will be granted and the University may provide alternative accommodations instead. While documentation of past accommodation history is important and will be considered, it is not decisive as to what accommodations will be granted by the University. The University reserves the right to request additional documentation if the initial documentation does not provide sufficient information.

Institutions of higher education do not accept IEPs utilized in primary (K-12) education. The cost of obtaining an evaluation is borne by the student. Other institutions, licensing authorities, and testing agencies (which administer standardized tests such as the GRE) may require different documentation of disabilities than the supporting documentation required by the University.

4. Collaborate with the 504 Coordinator to discuss Reasonable Accommodations including Auxiliary Aids and Services that will reduce or remove the barrier(s) resulting from the Disability or disabilities

identified in the supporting documentation. Each request for accommodations is handled on a case-by-case basis. The student should also identify to the 504 Coordinator each course for which they request the accommodations to be implemented.

5. Determine, through collaboration with the 504 Coordinator, the reasonable and appropriate accommodations for the student that will be formalized in an accommodation letter created by the 504 Coordinator. The accommodation letter states a student's accommodations but not a student's Disability diagnosis. The 504 Coordinator will provide a copy of a student's accommodation letter to the student for review and approval before disseminating the letter to the student's instructor(s) for implementation.
6. Discuss the approved Reasonable Accommodations with the instructor in each course for which the student requests the accommodations to be implemented to determine how the accommodations set forth in the accommodation letter will be accomplished in the specific course.
7. Contact the 504 Coordinator with any questions or concerns about implementing the accommodations set forth in the accommodation letter in any course. A student who believes that an approved accommodation is not being appropriately implemented, or is otherwise having difficulty with an instructor related to accommodations, should review Section 9 below, for guidance in handling the situation.
8. Notify the 504 Coordinator at least ten (10) Working Days in advance of a scheduled exam/assignment/program/course event if the student requests to receive approved accommodations for the scheduled exam/assignment/program/course event.

The approved accommodations must be previously identified and documented in the student's accommodation letter for the course for which the accommodations is to be implemented.

If the student requests an accommodation that was not previously reviewed or granted by the 504 Coordinator, the student must inform the 504 Coordinator and provide supporting documentation including a medical evaluation.

### C. Review and Determination of Accommodations Request

The 504 Coordinator will review the student's accommodations request and any supporting documentation in order to determine if the requested accommodations should be approved or denied. As part of this review, the 504 Coordinator will determine if the supporting documentation meets the guidelines set forth above in Subsection B.3. If the supporting documentation does not meet the guidelines set forth in Subsection B.3, the student will be asked to return to the initial evaluator and request additional documentation. If the supporting documentation meets the

standards, the 504 Coordinator will determine the Reasonable Accommodations to be provided to the student.

The 504 Coordinator may also consider any past accommodations that have been effective for the student along with the type of accommodation currently requested by the student. Alternative accommodations may be provided if there is an alternative accommodation that would be equally effective for the student. If the 504 Coordinator determines that the requested accommodation would present a Fundamental Alteration, cause Undue Hardship for the University, or jeopardize the health and safety of others, and no reasonable alternative accommodations exist, then the accommodation will be denied.

The 504 Coordinator will make a determination no later than ten (10) Working Days after the student requests an accommodation and submits supporting documentation. If the student does not submit supporting documentation at the time that they request an accommodation, the 504 Coordinator will make a determination no later than ten (10) Working Days after the student submits supporting documentation. If the student submits additional supporting documentation for the same accommodation request, the 504 Coordinator will make a determination within ten (10) Working Days of the additional submission.

The 504 Coordinator will notify the student of the determination in writing via email. The correspondence will state if the requested accommodation was approved or denied, why it was approved or denied, other accommodations that were considered, and any alternative accommodations offered by the University. The correspondence will state that the University will consider other accommodation requests should the student make them, inform the student of their rights and options to seek a resolution through the grievance processes outlined in these Procedures or other applicable University policies and procedures, and options for reporting to external agencies.

#### D. Timeliness

The University encourages the timely request of accommodations prior to the start of a semester because the documentation and determination process may take some time. Students should make their requests for accommodations to the 504 Coordinator as early as possible in order to facilitate scheduling or the acquisition of services, equipment, and/or other materials. However, accommodation requests can be made and will be accepted and considered at any time. Granted accommodations are not effective retroactively. Therefore, students will not be able to re-do assignments or re-take exams that they originally took before they asked for and received accommodations.

Timely implementation can be negatively impacted by delayed request for accommodation letters. A student with a Disability may elect not to request for accommodations. In this case, accommodations will not be provided. However, if a student seeks accommodations later in the semester, the student should be aware that accommodations are not retroactive, and previous grades will stand as earned.

Once a student has been approved to receive Reasonable Accommodations, the University will provide appropriate accommodations as expeditiously as possible. Generally, accommodations will be in place within fifteen (15) Working Days of the approval date; however, some accommodations can require a longer period of time to arrange. The 504 Coordinator will notify the student in writing of any delays.

#### E. Checking-In, Modifications, and Additional Accommodations

The types of accommodations provided to students with documented disabilities will vary depending on the nature of the Disability and the course content. Often an initial trial-and-error period may be needed to determine the best way to accommodate a student's Disability. If accommodations do not meet the needs of the student, the student should contact the 504 Coordinator for further assistance.

It is the student's responsibility to contact and engage the 504 Coordinator in a discussion when the need arises to discuss the implementation of the student's accommodations, identify any issues of concern, discuss the student's upcoming class schedule, consider whether any additional accommodations are necessary or if current accommodations need to be modified, etc. The 504 Coordinator will presume the approved accommodations are being implemented effectively unless they hear otherwise.

It is recommended that students contact the 504 Coordinator with any identified needs prior to the start of a semester. However, students who have been granted accommodations may request additional accommodations and/or modifications to their already granted accommodations at any time by contacting the 504 Coordinator. The student must submit additional supporting documentation including a current medical evaluation that identifies any recommended additional accommodations and/or modifications. The 504 Coordinator will undertake a review and determination of the new accommodations request.

#### F. Continuance of Current Approved Accommodations

If a student would like to request a continuance of current approved accommodations for a new semester, they must request the 504 Coordinator to update their accommodation letter for dissemination to their instructor(s) for the new semester. Students are encouraged to make the requests to the 504 Coordinator at the beginning of each semester to ensure timely implementation of accommodation. It is the student's responsibility to request accommodation letters through the 504 Coordinator each semester in order for accommodations to be provided.

The accommodation letter will then be updated and sent via email to the student along with each instructor that student has identified for the request. These letters verify the existence of a disability and identify reasonable accommodations. This process is referred to as "self-disclosure" of a disability. The student and the instructor shall then meet to discuss the implementation of appropriate accommodations for each course.

Questions about implementation of accommodations for each course should be directed to the 504 Coordinator. The 504 Coordinator will work with the student and instructor to facilitate timely implementation of accommodations.

At the time of the student's request, if the 504 Coordinator determines that the student's medical evaluation on file with the University was completed more than three (3) years ago, the student must submit a current medical evaluation that meets the standards set forth in Subsection B.3. If the updated medical evaluation includes additional accommodations and/or modifications to the student's already granted accommodations, the 504 Coordinator will undertake a review and determination of this new accommodations request. The timeline stated in Subsection C will apply to this new accommodations request.

## **6. Temporary and Episodic Impairments**

A temporary impairment constitutes as a Disability under Section 504 if it is so severe that it substantially limits one or more major life activities for an expected or actual duration of six (6) months or less. Some examples of temporary impairments include, but are not limited to, broken extremities, hand injuries, torn ligaments, post-surgical recoveries, etc.

Students with a temporary impairment that constitutes as a Disability under Section 504 have a right to request accommodations under these Procedures and the Disability Accommodations Policy. Such requests will be reviewed and determined on a case-by-case basis, taking into consideration both the duration (or expected duration) of the impairment and the extent to which it limits a Major Life Activity of the affected individual.

Similarly, an impairment that is episodic or in remission constitutes as a Disability under Section 504 if it would substantially limit a Major Life Activity when active. Some examples of this type of impairment include, but are not limited to, asthma, multiple sclerosis, cystic fibrosis, cancer in remission, etc. These impairments may be substantially limiting at times and have little impact at other times.

Students with an impairment that is episodic or in remission may qualify for accommodations under Section 504 if their condition, though not constant, substantially limits a Major Life Activity when active. They have a right to request accommodations under these Procedures and the Disability Accommodations Policy. Such requests will be reviewed and determined on a case-by-case basis.

## **7. Class Attendance**

Regular class attendance can be a legitimate academic requirement, and some instructors have strictly-enforced policies regarding the number of absences a student may accrue before the student's grade is affected. Students with disabilities may request accommodations that could impact their class attendance. Such requests must be made using the guidelines established by these Procedures and the Disability Accommodations Policy. Students who seek to obtain accommodations that could impact their class attendance must engage in the Interactive Process outlined in these Procedures and receive approval for the requested accommodations.

## **8. Privacy and Recordkeeping**

Disability-related information may be shared on a legitimate need-to-know basis with University employees only when there is a compelling reason for disclosure regarding some specific aspect of the information, such as providing an appropriate accommodation. This determination is made by the 504 Coordinator.

The University shall maintain appropriate confidential records that identify students with disabilities. These records shall include the student's name, nature of Disability, accommodations requested, supporting documentation including medical evaluation, determination of the accommodations request made by the 504 Coordinator, and any accommodations letters. All such records, including medical records, are considered "education records" protected by the Family Educational Rights and Privacy Act of 1974 (FERPA) and its regulations. Medical records maintained by a campus program for services to students with disabilities are not exempt from FERPA's definition of "education records." Therefore, confidential records will be protected in accordance with FERPA regulations with the purpose of providing appropriate Disability-based accommodations to students. Information about the student may be released with the student's informed written consent in accordance with FERPA or other applicable law.

The University shall maintain all documents and other materials related to any grievance proceedings for a period of seven (7) years. All documents and other materials will be maintained confidentially to the extent permitted by law.

## **9. Grievances Related to Students' Disability Accommodations**

### **A. General Information**

1. Qualified students and prospective students with disabilities who disagree with a decision or process related to accommodations or services have the right to resolve the matter by submitting a grievance. Grievances could be made about the determination of Disability status, accommodations and/or service provision, delay and/or denial of accommodations and/or Auxiliary Aids and Services, program and architectural inaccessibility, and/or failure to be reasonably accommodated in the educational setting.
2. Students with concerns or complaints relating to a belief that they has been treated differently or harassed because of their Disability or retaliated against for participating in University procedures associated with accommodations requests should consult AJU's [Policy and Procedures on Prohibition of Unlawful Discrimination, Harassment, and Retaliation](#) ("Anti-DHR Policy and Procedures"). The University's Office of Equity, Compliance, and Title IX is responsible for receiving, reviewing, and responding to reports of alleged DHR conduct. Students could use the online reporting form on the University's [Equity, Compliance, and Title IX](#) webpage to make a report or complaint. Reports of alleged DHR conduct would not be addressed by the grievance resolution process described in the Student Accommodations Procedures.

3. Resolution of grievances takes place through one or both of the following means:
  - a. Informal resolution conducted by the 504 Coordinator; and/or
  - b. Formal resolution conducted by the Accommodations Appeal Panel (“AAP” or “Panel”).

It is generally recommended that students attempt an informal resolution first before requesting a formal resolution. However, students are not required to pursue an informal resolution and have the right to request a formal resolution at any time.

4. It is the responsibility of students to initiate and pursue the grievance resolution process. No student should be subjected to negative consequences or suffer retaliatory action because of filing a grievance.
5. During the grievance resolution process, any accommodations or services that have already been implemented will continue uninterrupted, unless the student requests for a pause or termination.
6. The student may withdraw the grievance at any stage, at which point the process will immediately terminate. During all stages of the grievance the burden of proof will be on the student.
7. The grievance resolution process is not investigatory and does not result in a finding of misconduct or violation of AJU’s policies/procedures against any individual(s).
8. The grievance resolution process is designed to resolve internal differences and is not a legal proceeding; therefore, neither the student nor the University will have an attorney present at meetings during this process. The student will be able to consult with an attorney when meetings are not being held.
9. General dissatisfaction or mere disagreement with an accommodation decision will unlikely result in a different decision if the student does not provide new supporting documentation that sufficiently demonstrates the need for a different decision.

#### B. Grievance Submission

Any student who would like to submit a grievance is encouraged to contact the 504 Coordinator immediately, at [Elizabeth.Honig@aju.edu](mailto:Elizabeth.Honig@aju.edu) or 312-382-3113. The grievance must be submitted within fifteen (15) Working Days of the occurrence of the event(s) giving rise to the grievance.

The student should state all of the following, in writing, for their grievance submission:

- a. The accommodation or service that is subject to the grievance.
- b. The fact(s) that form the basis for the grievance.
- c. If the grievance is regarding an accommodation decision or a determination of Disability status, reason(s) why the student thinks the decision or determination was incorrect.
- d. New supporting documentation and/or self-reported information not previously shared. The student should share all information related to their concern that they would like considered during grievance resolution. These documents and information are submitted at the student's own expense.
- e. The request to resolve the grievance through either informal or formal resolution. If the student seeks a formal resolution, they must include, in writing, alleged procedural irregularities that occurred, alleged substantive errors that were made, alleged evidence of bias by the decisionmaker(s), and/or new evidence that was not previously available that may significantly affect the original decision.
- f. The desired resolution and outcome.

Depending on which form of resolution the student selects, the 504 Coordinator will respond to the student in accordance with the processes described below.

### C. Informal Resolution

Informal resolution is an informal process in which students discuss their grievance directly with the 504 Coordinator to determine how best to resolve disagreement or dissatisfaction with policies, practices or individuals. This process is intended to assist students in communicating and clarifying expectations with AJU faculty and staff regarding the provision of accommodations or Auxiliary Aids and Services.

Student may wish to pursue an informal resolution for any of the following:

- Disagreement or dissatisfaction with a determination of Disability status, an accommodation decision, and/or related issues. For instance, a student disagrees or is dissatisfied with the 504 Coordinator's decision to deny a requested accommodation, to provide an alternative accommodation rather than the specific accommodation requested by the student, or that the student has not presented sufficient supporting documentation.
- A requested accommodation has not been properly provided or has not been implemented in an effective or timely manner. For instance, a student has concerns or difficulties using their accommodations due to the action or inaction of a faculty member, or other AJU office or staff, or believes AJU faculty or staff has failed to provide an approved

accommodation.

- A problem arises regarding the delivery of accommodations, determination about accommodations, or other issues of access. For instance, students experience difficulties communicating with a faculty member or AJU staff about the delivery of accommodations.

The 504 Coordinator will arrange a meeting within ten (10) Working Days of the student's written request to initiate an informal resolution. Before the meeting, the 504 Coordinator will review any newly disclosed information and/or supporting documentation shared by the student. During or after the meeting, the 504 Coordinator may ask any relevant follow-up questions, if needed. When appropriate, the 504 Coordinator will also discuss the issues with other University officials.

When a student grieves about an accommodation decision or determination of Disability status, the 504 Coordinator will determine whether the decision or determination should be revised or remain the same. If the decision or determination is revised, the 504 Coordinator will ensure that the revised decision or determination is implemented.

When a student grieves that an approved accommodation is not being implemented, the 504 Coordinator will determine whether the accommodation is being fully implemented, and if it is not, ensure that the accommodation is implemented.

The 504 Coordinator will inform the student in writing of the outcome no later than ten (10) Working Days after the most recent meeting held with the student. If an informal resolution is not reached, the student can request a formal resolution of their grievance. Students are not required to engage in informal resolution and may proceed directly to formal resolution at any time.

If the student wishes to engage with a University official other than the 504 Coordinator for the informal resolution, the University will assign a designee to conduct this process.

#### D. Formal Resolution

The formal resolution will be conducted by the Accommodations Appeal Panel ("AAP" or "Panel") comprised of three (3) AJU employees selected from a pool of these University officials-

- Chief Academic Officer
- Rector
- Associate Director of Early Childhood Education
- Vice President and Director of Camp Alonim
- Director of Brandeis Camp Institute

A formal resolution will only be considered by the AAP if it meets one of the

following four criteria:

1. Procedural irregularities occurred which were sufficient to affect the determination and/or the decision of the 504 Coordinator. The student must describe how the procedures were not followed and/or how the process was not conducted fairly. Procedural irregularities that are considered by the AAP to be harmless and did not, in the judgment of the AAP, adversely affect the process, are not a basis for reversing the determination and/or the decision of the 504 Coordinator.
2. There was a substantive error (such as a misunderstanding of the student's accommodation request) made during the accommodation review process that substantially impacted the outcome of the decision. A substantive error includes a clear error in the factual findings of the accommodations review. To submit an appeal based on substantive errors, the student must demonstrate that they already attempted to address the error(s) with 504 Coordinator who made the original accommodation decision and was unable to resolve the issue.
3. New evidence exists that was not reasonably available to present at the time of the initial review or decision by the 504 Coordinator, which if introduced, could reasonably be expected to have significant bearing on the decision or alter the outcome of the review. The student must submit, provide, and describe the new and relevant information and explain why it was not available at the time of the original accommodation request. If the AAP determines that the student has satisfied this burden, the AAP will reconsider the grievance in light of the new evidence.
4. Evidence of bias or prejudice on the part of the person(s) who made the accommodation decision that rendered them unable to consider the accommodation request objectively and completely. For claims of bias or prejudice based on the student's Disability status, please consult the [Anti-DHR Policy and Procedures](#) referenced in Subsection A.

A student who seeks to introduce new evidence has the burden of demonstrating that the evidence was not reasonably available at the time of the initial review or decision and that the introduction of such new evidence can be reasonably expected to affect the determination of the 504 Coordinator.

A detailed account of the new information must be clearly described and be accompanied by supporting documentation from a certifying professional such as a treating physician, current therapist, or similar person. Information is not considered new that existed at the time of the original accommodation request but was voluntarily withheld during the initial review.

If the student claims procedural irregularities, substantive error, and/or evidence of bias, the student must provide an explanation of why they believe that a procedural irregularity, substantive error, and/or evidence of bias impacted the decision regarding their accommodation. The student must indicate clearly which of these

reasons is the basis for their grievance. If the student is claiming substantive error, they must provide evidence of their attempt to resolve the issue.

The 504 Coordinator will inform the AAP of a request for formal resolution and provide to AAP the written grievance within ten (10) Working Days of the student's written request to initiate a formal resolution. The 504 Coordinator will forward to the AAP all written communications received from the student regarding the grievance. The 504 Coordinator may be asked by the AAP to forward AAP's communications to the student.

Within ten (10) Working Days of receipt of the student's grievance and request for formal resolution, the AAP will provide in writing a confirmation that the Panel is reviewing the grievance, the names of the three Panel members, the deadline for the student to submit any additional information, and the date by which the Panel will notify the student of the formal resolution decision.

If the student wishes to object to the presence of any of the members of the AAP because the student believes that the member or members has or have a conflict of interest that would prevent them from being impartial, the student must communicate that objection to the 504 Coordinator within five (5) Working Days of the student's receipt of the notice informing the student of the composition of the AAP. The 504 Coordinator will inform the University's designated official of the student's objection.

The University's designated official must rule on the objection and, if the objection is sustained, replace the AAP member or members within five (5) Working Days, unless an extension of up to an additional ten (10) Working Days is necessary because the University is unable to replace the AAP member or members within the initial 5 Working Days. The 504 Coordinator will notify the student in writing of the decision, and if a replacement is made, the name(s) of the stand-in AAP member(s).

The AAP will review all submitted information. When appropriate, the AAP will also review information related to the accommodations decision made by the 504 Coordinator. The AAP's review will be to ensure due process was followed and if appropriate, consider new evidence that may affect a student's requested service or accommodation. The AAP will review the request for formal resolution to determine if it meets any of the four criteria described above.

If the AAP determines the request for formal resolution does not meet any of the four criteria, the request will be denied and the student will be notified via email by the 504 Coordinator.

If the request for formal resolution meets the criteria, the AAP will proceed with a review of the original process and all grievance-relevant information (medical evaluations, other documentation, etc.). Students should be aware that documentation containing confidential information will be viewed by the AAP, whose members hold this information in strict confidence. The AAP may consult with the appropriate University officials during their review.

If deemed necessary, the AAP may meet with the student to discuss the concern and obtain clarifying information. The student may also request to meet with the AAP. The AAP may meet with the individual(s) against whom the grievance is made, any individuals identified by the student as having knowledge or information supporting the grievance, and any other involved parties. The AAP will also collect and review any documentation or other evidence identified by the parties, and other information that may be relevant to evaluating the matter and reaching a decision, as appropriate.

The AAP will make a final determination within fifteen (15) Working Days from student's submission of the request. The AAP reserves the right to extend this time frame if necessary. The length of time involved will depend on the complexity of the circumstances and the number of parties involved. Students will be updated on a reasonable basis for more complex grievances. In cases where the AAP is unable to make a decision within this timeframe, the AAP will notify the student of the need for additional time, the reason, and an approximate date upon which a decision will be made.

The AAP has the authority to:

- Affirm the original decision, including the outcome(s) imposed.
- Refer the case back to the 504 Coordinator for further consideration if new relevant information was not reasonably available at the time of the initial accommodations review has been presented.
- Recommend a modification of the original decision. This could include reversing part or all of the original decision and resolve the grievance with no additional action.
- Reduce or increase the assigned outcomes(s).

If the AAP determines that the grievance has merit, the AAP will make a written decision, including a proposed resolution. The AAP shall note, in its proposed resolution, if any changes are to be made to the accommodation decision or Disability status determination. The ultimate resolution of any grievance or determination of whether a new, modified, or additional accommodation will be provided to the student, rests in the sole discretion of the AAP and the University.

If the AAP determines that the grievance does not have merit, it will also make a written decision.

The written decision of the AAP is final and not appealable. The 504 Coordinator will email AAP's written decision to the student and inform the student that this communication serves as a written notification to the student of AAP's decision regarding the grievance. The 504 Coordinator will also inform the student of their rights and options to pursue external complaints.

E. Right to Pursue External Complaints

Nothing in this process should be construed as impeding or prohibiting a student from filing a complaint with the appropriate external governmental agency. Although a student with a concern or complaint about any Disability accommodation is encouraged to attempt to resolve their grievance via these Procedures, students have the right to file a complaint directly with the U.S. Department of Education's Office for Civil Rights (OCR) before or after any internal resolution process. Any internal resolution process will continue through completion, regardless of whether a student files a complaint with the appropriate external governmental agency.

Office for Civil Rights (OCR)  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202-1100  
Customer Service Hotline #: (800) 421-3481  
Facsimile: (202) 453-6012  
TDD#: (800) 877-8339  
Email: [OCR@ed.gov](mailto:OCR@ed.gov)  
Web: <http://www.ed.gov/ocr>

It is important to note that in order to protect certain legal rights and remedies, complainants must comply with certain time limits and deadlines. Affected persons should contact the agency listed above to verify time limits for filing. Failure to meet required deadlines may result in a loss of rights to seek a legal remedy.

#### F. Prohibition Against Retaliation

Any student who has sought an informal or formal resolution of a grievance under the Student Accommodations Procedures, or who has participated in any grievance resolution process, and who subsequently believes that they have been subjected to retaliation of any kind by any University employee is directed to immediately report the alleged retaliatory conduct using the processes outlined in AJU's [Anti-DHR Policy and Procedures](#). Reports of retaliation will be reviewed and addressed promptly in a manner intended to protect confidentiality as much as practical, consistent with the University's obligation to conduct a full and fair review of reported DHR conduct. Students also have the right to file a claim of retaliation directly with OCR.