PHCC Guidelines for Documenting a Disability

PHCC is committed to serving persons with documented disabilities. A goal of PHCC is that each qualified student has an opportunity to pursue a college education regardless of the presence or absence of a disability. To reach that goal, PHCC will make reasonable accommodations in providing the course, program, and building modifications, and/or auxiliary services that are necessary to assure equal access.

Under Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA) of 1990, and the Americans with Disabilities Act Amendments Act (ADAAA) of 2008, disAbility Services are available to all currently enrolled students who have a documented disability that substantially limits them in one or more of life’s major activities and who are otherwise academically qualified.

Definitions of Terms

- **Disability** is defined as a physical or mental condition that substantially limits one or more major life activities.
- **Major life activities** are defined as functions such as caring for oneself, performing manual tasks, including walking, seeing, hearing, speaking, breathing, learning, working, and experiencing leisure.
- **Substantially limits** means when one is unable to perform a major life activity that the average person can perform; or when one is significantly restricted in the manner or duration under which one can perform a particular major life activity as compared to the average person.
- **Otherwise academically qualified** is defined as meeting the academic or technical standards for admission for participation in the education program or activity requested. PHCC uses multiple methods to determine whether a student is otherwise academically qualified, including the satisfactory completion of PHCC’s Ability to Benefit, Mathematics and/or English placement tests at the minimum level of instruction offered by the college and/or demonstration of ability to benefit through the information present in a student’s disability documentation.

Eligibility Requirements

In order to qualify for services, the student must provide the following information:

1. The student must provide clear and specific evidence that a qualified professional has established a formal diagnosis of a disability. However, a diagnosis report alone is not enough to establish eligibility for accommodations under the ADA and Section 504. There must also be evidence of a "substantial limitation" in a major life activity, such as walking, seeing, hearing, learning, breathing, etc. (For example, evidence could be a description of the diagnostic tests, methods, and/or criteria used in establishing the diagnosis, the specific results of the diagnostic procedures, and when available, both summary and specific test scores.) *When a student’s functioning demonstrates a “relative...*
weakness” or “low average functioning”, it is typically an indication that a substantial limitation is not present.

Examples of individuals who may be eligible for disability services include, but are not limited to, the following types of disabilities:

- Blindness/Low Vision
- Deafness/Hard of Hearing
- Psychological/Psychiatric Disorder
- Attention Deficit Disorder/Attention Deficit Hyperactivity Disorder
- Traumatic Brain Injury/Acquired Head Injury
- Autism-Spectrum Disorders
- Speech Impairment
- Chronic Medical Condition
- Specific Learning Disability
- Orthopedic/Mobility Impairment
- Intellectual Disability

2. The student requesting accommodations must have met the academic or technical standards for admission for participation in the educational program or activity requested.

**Assessment (Intake) Process**

Students with disabilities seeking accommodations must identify themselves to the PHCC disAbility Counselor, provide documentation of a disability that meets the guidelines specified in this policy and complete all required college forms in order to begin the intake process.

The intake process includes a review by the PHCC DisAbility Counselor of the appropriate professional’s documentation, as well as a review of the fundamental goals and essential standards of the academic program, course or service in question. If the need for accommodations is substantiated, the assessment process will generate a list of reasonable accommodations based on the following criteria: potential effectiveness, preferences of the requester, and the potential for an undue financial or administrative burden to the institution.

The final determination of appropriate accommodations rests with the PHCC DisAbility Counselor based on the review of all provided documentation. *In most cases, documentation should be no more than three years old, except as noted in the Guidelines by Disability Type section below.* Students may refer to the “Student Grievance Procedure” in the Student Handbook, if they do not agree with the counselor’s determination.

It is the responsibility of the student to obtain additional information or testing if it is required to determine eligibility for accommodations. PHCC does not routinely provide testing/formal assessment of disabilities or reimburse students who complete testing through a community provider. A list of community testing providers is available from the disAbility Counselor. PHCC will accept evaluations from all qualified professionals and do not specifically endorse the providers listed on the referral list.
Students who provide documentation but do not complete the intake process are not eligible to receive accommodations. In such cases, the DisAbility Counselor will make a reasonable effort to contact the student.

All information obtained in diagnostic and medical reports will be maintained and used in accordance with applicable confidentiality requirements.

General Guidelines for Professional Documentation

These general guidelines have been developed to assist students in working with their treating professional(s) to prepare the information needed by PHCC to verify eligibility and to support requests for accommodations, academic adjustments and/or auxiliary aids requested. If after reading the guidelines you still have questions, please refer to the following section, “Documentation Guidelines by Disability Type”. PHCC’s documentation guidelines adhere to the recommendations of the Virginia Higher Education Guidelines for Documentation of Disability.

All documentation should adhere to the following guidelines:

1. The name, title and professional credentials of the evaluator, including information about license or certification (e.g., licensed psychologist), as well as the area of specialization, employment and state/province in which the individual practices should be clearly stated in the documentation.

2. Documentation must be in narrative format. A diagnosis alone is typically not sufficient information to establish eligibility or provide accommodations.

3. The required currency of the qualifying documentation is determined by the disability type. Older documentation may be appropriate in certain situations if it is still relevant to the individual's situation and otherwise meets the guidelines outlined here. Examples of such situations include transfer students who have been continuously enrolled in college and have a history of receiving services and accommodations in a similar setting, and non-traditional aged college students whose documentation accurately describes their current ability to function academically. Periodic updates of documentation may be requested in situations where the etiology of the disability and the student’s level of functioning may change significantly over a shorter period of time. See “Documentation Guidelines by Disability-Type” section for specific criteria.


5. A description of the diagnostic tests, methods, and/or criteria used, the specific results of the diagnostic procedures, and when available, both summary and specific test scores.

6. Treatments, medications, and/or assistive devices/services currently prescribed or in use. Significant side effects that may impact physical, perceptual, behavioral or cognitive performance should also be noted.

7. A description of the expected progression or stability of the impact of the disability over time, particularly the next five years. This description should provide an estimate of the change in the functional limitations of the disability over time and/or recommendations concerning the predictable needs for reevaluation.
8. The certified professional should recommend accommodations, including adaptive devices, assistive services, compensatory strategies, and/or collateral support services. Those recommendations that are congruent with the programs and services offered by PHCC will be given deference. When recommendations go beyond services and benefits that can be provided by the college they may be used to suggest potential referrals to local area services providers outside of the college.

9. A prior history of accommodations, without demonstration of current need, does not in and of itself warrant the provision of a like accommodation. In addition, if no prior accommodation has been provided, the evaluator or appropriate professional must include an explanation as to why no accommodations were used in the past, and why accommodations are needed now.

Documentation Guidelines by Disability Type

These specific guidelines have been developed to assist students in working with their treating professional(s) to prepare the information needed by PHCC counselors to verify eligibility based on a specific type of disability. PHCC’s documentation guidelines adhere to the recommendations of the Virginia Higher Education Guidelines for Documentation of a Disability.

Criteria for Deaf/Hard of Hearing

- An assessment (Audiogram) confirming the diagnosis of hearing impairment and the severity of hearing loss.
- Documentation should be less than three years old. In cases where the hearing loss is static (unchanging), an older audiogram may be presented with a note from a physician confirming that there have been no changes in functioning since the last assessment. If the hearing loss is progressive, updated documentation may periodically be requested.
- Suggestions by the physician of reasonable accommodations supported by the diagnosis are recommended.

Criteria for Blind/Low Vision

- A diagnosis of visual impairment including acuity, prognosis, and prescription of correction and/or low vision aids.
- Documentation should be less than three years old. In cases where the visual impairment is static (unchanging), an older assessment may be presented with a note from a physician confirming that there have been no changes in functioning since the last assessment. If the loss of vision is progressive, updated documentation may periodically be requested.
- A summary of the current level of functioning, specifying areas of functional limitation.
- A summary of the assessment procedures used to come to the diagnosis.
- Suggestions by the physician of reasonable accommodations supported by the diagnosis are recommended.

Criteria for Psychological/Psychiatric Disorders
• A clear statement of the DSM or ICD diagnosis, including pertinent history.
• Documentation should typically be less than one year old. Updated documentation may periodically be requested to determine current functioning.
• A narrative summary of the assessment procedures used to come to the diagnosis.
• A narrative summary of the current level of functioning, specifying present symptoms and fluctuating conditions/symptoms resulting in functional limitations.
• Medical information to be considered in a college environment, including medication needs and side effects.
• Suggestions of reasonable accommodations supported by the diagnosis.

Criteria for Attention Deficit/Attention Deficit Hyperactivity Disorders

• A clear statement of the DSM or ICD diagnosis, including pertinent history. A Neuropsychological Evaluation is preferred.
• Documentation should typically be less than three years old. Updated documentation may periodically be requested to determine current functioning.
• A narrative summary of the assessment procedures used to come to the diagnosis. Assessment results should be included.
• A narrative summary of the current level of functioning, specifying present symptoms and fluctuating conditions/symptoms resulting in functional limitations.
• Medical information to be considered in a college environment, including medication needs and side effects.
• Suggestions of reasonable accommodations supported by the diagnosis.

Criteria for Traumatic Brain Injury/Acquired Head Injury

• An assessment (Neuropsychological Evaluation or equivalent testing) confirming the diagnosis of a brain injury.
• Documentation should typically be dated more than eighteen months post-injury. If an initial evaluation is presented, a post-eighteen month evaluation will be requested at the end of the following semester or once the eighteen month milestone is reached. Post-eighteen month evaluations using testing instruments normed for children must be no more than three years old at the time of intake. Post-eighteen month evaluations using adult-normed testing instruments are considered current for a period of five years.
• A narrative summary of the cognitive and achievement measures and evaluation results, including standardized scores, used to make the diagnosis.
• A narrative summary of the current level of functioning, specifying present residual symptoms resulting in functional limitations.
• Medical information to be considered in a college environment, including medication needs and side effects, and personal care concerns.
• Suggestions of reasonable accommodations supported by the diagnosis.

Criteria for Developmental Disabilities (including Autism-Spectrum Disorders)

• A statement of DSM diagnosis and date of onset.
- A narrative summary of the current level of functioning, specifying present symptoms resulting in substantial functional limitations of one or more life functions.
- Medical information to be considered in a college environment, including medication needs and side effects, and personal care concerns.
- Suggestions of reasonable accommodations supported by the diagnosis, including assistive devices, techniques, or supports that are essential to the success of the student.

Criteria for Specific Learning Disabilities

- Documentation of a Learning Disability should be no more than three years old if testing instruments normed for children were used in the evaluation. Evaluations using adult-normed testing instruments are considered current for five years.
- Criterion scores must be used to establish the area(s) of disability. Statements such as “learning differences,” “relative weaknesses,” “appears to have a learning style similar to a person with a learning disability” or “additional testing should be conducted to rule out a learning disability” and academic problems in and of themselves do not substantiate a learning disability.
- A qualified, licensed professional must conduct the evaluation. Qualified professionals generally include a clinical or educational psychologist, neuro-psychologist, and learning disabilities specialist. All reports must be typed, legible, signed by the qualified professional, and submitted on official letterhead.
- Tests used to determine eligibility must be technically sound and normed on the appropriate population. Actual test results must be included in the evaluation with all subtest and standard scores and percentiles listed as appropriate.
- Comprehensive testing that measures both Aptitude and Achievement is required. Appropriate aptitude test instruments may include, but are not limited to: The Wechsler Adult Intelligence Scale (WAIS), Wechsler Intelligence Scale for Children, Stanford Binet Intelligence Test. Appropriate achievement test instruments may include, but are not limited to: Woodcock Johnson Tests of Achievement, Wechsler Individual Achievement Test, Stanford Test of Academic Skills. Specific achievement tests such as the Test of Written Language-2 (TOWL-2), Woodcock Reading Mastery Test, or the Stanford Diagnostic Mathematics Test may also be included with complete achievement battery.
- The Slosson Intelligence Test, Kauffman Brief Intelligence Test, and the Test of Non-Verbal Intelligence are not sufficient to establish aptitude levels. The Wide Range Achievement Test and The Nelson Denny Reading Test are not sufficient in and of themselves to establish achievement levels.
- Other assessment measures (Visual Motor Integration, Memory, etc.) may be integrated with the above documents.
- Any recommended accommodations by the evaluator(s) should include a detailed explanation as to why each accommodation is needed and must be backed-up by testing data.
- IEPs and/or 504 Plans are not sufficient documentation to establish eligibility, but may be included.

Criteria for Speech Impairment
• A diagnosis of speech impairment including prognosis from a licensed speech/language clinician.
• Documentation should be less than three years old. In cases where the speech impairment is static (unchanging), an older assessment may be presented with a note from a speech/language clinician confirming that there have been no changes in functioning since the last assessment. If change in functioning is expected, updated documentation may periodically be requested.
• A summary of the current level of functioning, specifying areas of functional limitation.
• A summary of the assessment procedures used to come to the diagnosis.
• Suggestions by the speech/language clinician of reasonable accommodations supported by the diagnosis are recommended.

Criteria for Chronic Medical Conditions

• In general, a diagnosis of a medical condition, including prognosis is required. If no specific diagnosis has been made, documentation must demonstrate that present medical symptoms substantially limit one or more major life activities.
• Documentation should be less than three years old. In cases where the impairment is static (unchanging), an older assessment may be presented with a note from a physician confirming that there have been no changes in functioning since the last assessment. If functioning is expected to change during the student’s enrollment, updated documentation may periodically be requested.
• A summary of the current level of functioning, specifying areas of functional limitation.
• A summary of the assessment procedures used to come to the diagnosis.
• Suggestions by the physician of reasonable accommodations supported by the diagnosis are recommended.
• Other medical information to be considered in a college environment, including medication needs and side effects, and personal care concerns.