



ORLANDO COLLEGE OF OSTEOPATHIC MEDICINE

OCOM Policy & Procedure

Policy #D055

Orlando College of Osteopathic Medicine

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Policy Title: OCOM Student Disability Accommodations and Access Policy

Orlando College of Osteopathic Medicine (OCOM) is committed to providing equal educational opportunity for persons with disabilities in accordance with the nondiscrimination policy of OCOM and in compliance with Section 504 of the Rehabilitation Act of 1973, with Title II of the Americans with Disabilities Act of 1990, and with the ADA Amendments Act of 2008.

The law states that a person with a “disability” is:

“Someone with a physical or mental impairment which substantially limits one or more of the major life activities of such an individual; or a person with a record of such impairment; or a person who is regarded as having such an impairment.” (Section 504 of the Rehabilitation Act of 1973)

Equal educational opportunity means that a person with a disability who is qualified for admission must have access to the same programs, services, and activities as other students. If necessary, to provide equal opportunity, OCOM will make reasonable modifications to its policies, practices, and procedures unless doing so would fundamentally alter the nature of the service, program, or activity or pose an undue administrative or financial burden.



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Under Section 504, OCOM may not discriminate in the recruitment, admission, or educational process or in the treatment of students. Students who have self-identified, provided documentation of disability, and requested reasonable accommodations are entitled to receive approved modifications of programs, appropriate academic adjustments, or auxiliary aids that enable them to participate in and benefit from all educational programs and activities. Section 504 specifies that OCOM may not limit the number of students with disabilities admitted, make pre-admissions inquiries as to whether or not an applicant has a disability, use admission tests or criteria that inadequately measure the academic qualifications of students with disabilities because special provisions were not made, exclude a qualified student with a disability from any course of study, or establish rules and policies that may adversely affect students with disabilities.

In support of its commitment to equal educational opportunity, OCOM provides various services and accommodations to students with documented disabilities.

Questions or comments about this manual should be directed to the Office of Student Services at disabilityservices@ocom.org.

Technical Standards

OCOM will make reasonable accommodations, as required by law, for students whose disabilities prevent them from successfully completing the entirety of the OCOM curriculum and graduating as osteopathic physicians.

Please refer to OCOM [Technical Standards Policy D004](http://www.ocom.org/policies), published at www.ocom.org/policies.

Matriculating or Current OCOM Students with Disabilities

Section I: Whom to Contact

Students with documented disabilities who desire accommodations must contact the OCOM Office of Student Services at disabilityservices@ocom.org.

No accommodations will be made without approval through the OCOM process. A medical, psychological, or other diagnosis may rise to the level of a disability if it substantially limits one or more major life functions, one of which is learning. A disability may be temporary or ongoing.



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Section II: How to Obtain Services

For any student deemed reasonably eligible by OCOM, OCOM provides reasonable accommodations or modifications to policies and practices to ensure that all students have equal access to all OCOM programs, services, and activities. The purpose of accommodations is to provide access and equal educational opportunity for all students.

Accommodations are not provided retroactively. Any student approved for accommodations is entitled to services and accommodations only from the approval date. Even if the student can establish that the student had a disability on a date before applying for accommodations, OCOM will not expunge or re-examine coursework completed before the student was reviewed and approved for accommodation(s).

No student is required to disclose a disability to OCOM. However, as discussed above, any student at OCOM will not receive retroactive accommodations for work completed before the accommodations approval was granted.

Documentation of a student's disability is only shared with relevant OCOM faculty, staff, or administration on a need-to-know basis with a release of information signed by the student.

General Procedure for Receiving Accommodations

1. Incoming or current students must contact the Associate Dean for Student Services to request services as soon as possible. OCOM is not responsible for identifying students with disabilities and is not required to provide services unless proper procedures have been followed in making a request. Students may request a meeting using this [form](#).
2. The student must schedule a meeting with the Associate Dean for Student Services to provide documentation of the disability and to complete the appropriate paperwork. At the meeting, students will receive the OCOM Release of Information [form](#).
3. The Associate Dean for Student Services reviews the student's request and in discussion with people familiar with OCOM's educational environment will determine the extent to which the recommended accommodations are appropriate. All supporting documentation will be reviewed to determine what



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reasonable accommodations are available for a student's specific situation, based in part on the nature of the student's disability.

4. Decisions regarding accommodations are made on a case-by-case basis. There is no standard accommodation for any particular disability. OCOM will make reasonable modifications to its policies, practices, and procedures unless doing so would fundamentally alter the nature of the service, program, or activity or pose an undue administrative or financial burden.
5. If the request for accommodations is approved, the Associate Dean for Student Services generates a *Letter of Accommodation* (LOA) documenting the student's approved accommodations. The Office of Students Services coordinates the dissemination of the LOA. Any student whose requested accommodations are not approved is encouraged to meet with the Associate Dean for Student Services to discuss the reasons for the denial. The Associate Dean for Student Services may discuss the Grievance procedure with the student at this time.
6. All accommodations will need to be applied for on an annual basis.

Accommodations on COMLEX-USA Exams

Students who want to request accommodations for any COMLEX-USA examination must submit their applications directly to the NBOME within the timeframe designated by the NBOME. Please contact the NBOME directly for more information: <https://www.nbome.org>.

OCOM is not responsible for requesting or approving COMLEX-USA testing accommodations.

Note: The NBOME has specific accommodation criteria and may deny a student's accommodation request even if OCOM has granted that student accommodations. If a student receives accommodations from NBOME, the student does not automatically become eligible for accommodations by OCOM.

Confidentiality of Information

Information received from a student is governed under the provisions of the *Family Education Rights and Privacy Act (FERPA) of 1974*. Under the provisions of this law, students in post-secondary education have the right to inspect and review their school



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records as defined by law. Other than for “directory information,” OCOM will release information only with the student’s written consent or in accordance with law and will use “directory information” in the student’s best interest. The OCOM *Release of Information* form can be accessed via [here](#).

OCOM is committed to ensuring that all information compiled concerning a student remains confidential as applicable law requires. Any information monitored or collected is used for the benefit of the student.

Section III: Student Responsibilities

General Student Responsibilities

1. The student will need to self-identify with the Associate Dean for Student Services to begin the process of requesting accommodations. OCOM is not responsible for identifying students with disabilities or for contacting such students to begin the accommodation request process.
2. The student must provide documentation that conforms to OCOM’s guidelines. If the student’s documentation is insufficient, the student is responsible for acquiring any additional required documentation and paying any costs thereof. OCOM reserves the right not to provide services or accommodations until all documentation specified in the guidelines is provided.
3. Any student approved for accommodations is responsible for retrieving the student’s *Letter of Accommodation* (LOA) from the Associate Dean for Student Services; the *Release of Information Form* is available [here](#).

Responsibilities of a Student Approved for Testing Accommodations

Testing accommodations require frequent communication between the student and the Office of Medical Education Operations (Years 1 and 2) or the Office of Clinical Education (Years 3 and 4). Testing information must be shared with these Offices in a timely manner.



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At the beginning of the semester, and at least one week before the first scheduled quiz or exam, the student should discuss the approved testing accommodations with the Office of Medical Education Operations. Students taking COMAT exams should contact the Office of Clinical Education. This discussion should address how, when, and where the testing accommodations will be provided. During this discussion, the student should have a calendar and a copy of the LOA. The student should also remind the Office of Medical Education Operations or the Office of Clinical Education of the student's need for accommodations at least one week before each quiz/exam.

Suppose a student believes the Office of Medical Education Operations or the Office of Clinical Education is not adequately meeting the student's accommodations. In that case, the student should discuss this concern with the Associate Dean for Student Services immediately.

The Offices of Medical Education Operations and Clinical Education must only provide accommodations listed explicitly in the LOA.

Responsibilities of a Student Approved for Handicapped Parking

Students who use handicapped parking on campus must maintain state-issued handicapped parking permits and must display those at all times while being parked.

If a student has consistent problems finding necessary handicapped parking near the student's class buildings, the student should notify the Director of Facilities immediately.

Section IV: Documenting a Disability

General Documentation Guidelines

To ensure reasonable and appropriate services and accommodations are provided to students with disabilities, students requesting such accommodations and services must provide current documentation of their disability. Such documentation generally must include the following:

- A clear diagnostic statement of the disability prepared by a licensed professional and
- A description of how the disability limits the student in a specified significant life activity and the severity of the limitation.



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The student is responsible for requesting accommodations and services to provide documentation of the disability. As such, the student will bear the cost of evaluations required according to these guidelines. If there is a change in the student's condition, the student may request modifications to previously approved accommodations.

The student must provide current supporting documentation for review at that time.

Guidelines for Documenting a Learning Disability

Every report should be on letterhead, typed, dated, signed, and otherwise legible, and be comprised of the following elements:

- **Evaluator Information:** The report should begin with the name, title, and credentials of the qualified professional who conducted the assessment. Please note that members of the student's family and OCOM faculty and staff are not considered appropriate evaluators.
- **Recent Assessment:** The report must provide adequate information about the student's current level of functioning. If such information is missing, the student may be asked to provide a more recent or complete assessment.
- **Testing:** There should be a discussion of all tests administered, observations of the student's behavior during testing, and a listing of all test scores (i.e., domain, cluster, subtest, index, etc.) represented in standard scores or percentile ranks.

An informal assessment, an Individualized Education Plan (IEP), or a 504 plan may help to supplement a more comprehensive test battery, but more documentation is needed when presented alone.

In addition, a clinical summary and a clearly stated diagnosis are helpful and must be included in the report. The summary should integrate the elements of the battery with background information, observations of the student during the testing situation, and the student's current academic situation. This summary should present evidence of a substantial limitation to learning and explain how the patterns of strength and weakness are sufficiently significant to substantiate a learning disability diagnosis. It should also demonstrate that the evaluator has ruled out alternative explanations for the learning problem. If social or emotional factors are possible obstacles to learning, they should be addressed in summary. This summary may include recommended accommodations, but these are not binding to OCOM. OCOM reserves the right to evaluate all documentation to determine what reasonable accommodations may be indicated and



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available for a student's specific situation based in part on the nature of the student's disability.

Section V: Grievance Procedure for Accommodations

All requests and grievances related to accommodations or special services must be brought to the OCOM Associate Dean for Student Services in writing first.

Students who feel OCOM is not meeting the student's disability needs may also file a grievance. In this case, the Associate Dean for Student Services will meet with the person filing the grievance.

The Associate Dean for Student Services will complete the complaint investigation within two weeks (14 days). The student will provide the Associate Dean for Student Services with the disability verification by a health professional and provide all suggestions for accommodations.

The Associate Dean for Student Services will meet with the OCOM faculty or staff member in charge of the area where the accommodations need to be made to see if a peaceful and prompt resolution can be made. Where a peaceful and prompt resolution can be made, the Associate Dean for Student Services will verify that the accommodation has been made and follow up with written verification to all parties within that two-week timeframe (14 days).

If the student cannot resolve the matter with the OCOM Associate Dean for Student Services, the student and the Associate Dean for Student Services should forward the complaint to the Dean for a formal resolution. The Dean will arrange a meeting with the student and the Associate Dean for Student Services within ten (10) business days of receiving the complaint. The Dean's decision is final.

If needed, students can exercise complaints through the Department of Education, Office of Civil Rights, and other legal channels.

Students or Guests of OCOM with Accessibility Concerns

Students or guests of OCOM who have concerns regarding accessibility for any OCOM event or program should contact the Office of Student Services and use the Accessibility form [here](#). An OCOM representative will contact the student or individual regarding the request in a timely manner.



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Religious Accommodations within the OCOM Curriculum

Due to religion, students who would like to request religious accommodations need to contact the Office of Student Services. OCOM will make reasonable modifications to its policies, practices, and procedures unless doing so would fundamentally alter the nature of the service, program, or activity. Students requesting accommodations should fill out this [form](#).

Service Animal Information

According to the Americans with Disabilities Act (ADA), a *service animal* is defined as:

“A service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability.”

Providing comfort or support does not qualify an animal as a service animal. If there are any questions about whether an animal qualifies as a service animal, the student should contact the Associate Dean for Student Services.

Service animals are defined as any dog individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, and calming a person with post-traumatic stress disorder (PTSD) during an exacerbation. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA (DOJ, 2011). Only dogs, and in some rare cases, miniature horses, are considered service animals under the ADA. Legal standards view service animals much in the same way as a wheelchair or cane: as a *tool* used by people with disabilities to gain greater access. Once the service animal is registered with OCOM, students are not required to notify OCOM that they plan to bring a service dog to class or campus events.



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Emotional support animals are animals that provide comfort and relieve symptoms of mental health disorders. Emotional support animals are prohibited in campus buildings, including classrooms and dining facilities.

A service dog or miniature horse must be housebroken, under control at all times, and have a harness, leash, or tether unless the individual, because of disability, cannot use a leash and/or a leash would interfere with the animal's work. If not tethered, the animal must be under control by voice commands, hand signals, or other effective means.

In compliance with the ADA, service animals are welcome in all buildings on campus and may attend any class, meeting, or other event. Service animals are expected to exhibit reasonable behavior while on campus. All service animals must always be entirely under the handler's control. This may include using a leash, harness, or tether if the restraint does not impede the dog's work. If not using a leash, the handler must control the dog by other means, typically voice commands.

A service animal can be removed from an event, classroom, or different OCOM location if the dog is not under the handler's control, if the handler does not take control of it, or if the dog is not housebroken. Disruptive behavior, such as barking or behaving aggressively, is grounds for removing a service dog from OCOM. Please notify the Office of Student Services immediately if a disruptive service animal must be removed from a class or event. The handler must be allowed to continue participating without the animal and must be provided with any assistance they need to do so – such as a guide for a student who has a visual impairment or assistance pushing a wheelchair.

Fear or allergy is not an acceptable reason to remove a service animal. Students with allergies to any service animal on campus will need to notify the Office of Student Services so arrangements can be made concerning student grouping and exposure.

Cleanliness of any approved service animal on campus is mandatory. Consideration of others must be considered when providing maintenance and hygiene of animals. The owner is expected to clean up and dispose of all animal waste. If the service animal disrupts other students, the animal must be moved to a location that does not disrupt the education of other students. A service animal can be removed from an area if the animal's presence creates a hazard. If a lab environment would be dangerous for the animal or if the animal would compromise the environment needed for the lab, please get in touch with the Office of Student Services. The animal's handler must be allowed



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to participate fully and may require additional support without the student's service animal.

An individual with a service animal can legally be asked only two questions if the animal's task is not readily apparent:

1. Is this service animal required because of a disability?
2. What work or task has the service animal been trained to perform?

The individual should not be asked about their diagnosis or specific disability or be asked to provide medical documentation of the need for the animal. The individual should not be asked about the animal's training. Many service animals wear harnesses, vests, or other items that identify them as working animals, but this kind of identification is not required. These are expressly forbidden under the ADA. The answer to the second question can vary widely as service animals' uses are increasing daily. The animal must be trained to perform tasks or work to meet the ADA definition. There is no standard certification or training process for service animals, and handlers are not legally required to provide proof of training or identification for the dog. However, if the answer to the second question involves only providing emotional support or comfort, the animal does not qualify as a service animal under the ADA. Animals used only to provide comfort as part of the treatment for a disability are considered "emotional support animals" and fall under a different set of requirements.

Service Animals in Clinical Training

Clinical education sites may have regulations, policies, and procedures regarding the permissibility of service animals in the clinical setting, which may differ from those of OCOM. OCOM has no control over an individual clinical site's requirements regarding service animals. Students must coordinate these requests with the clinical site, including the Regional Dean, Human Resources, ADA coordinator, or designated individual at the institution.

Students Registering Service Animals on Campus Must:

1. Register the service animal with the Office of Student Services
2. Fill out the registration [form](#) for the service animal.

This policy shall be posted to <https://ocom.org/policies>.