



Student Accessibility Services Policy and Procedure Manual

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Accessibility Services Introduction

The Northeast Ohio Medical University (NEOMED or University) embraces diversity and recognizes the value that individuals with disabilities add to the student body and institution and has included disabilities specifically in its diversity statement. It is our experience that individuals with disabilities (as defined by Section 504 of the Rehabilitation Act and the Americans with Disabilities Act) have successfully completed the curriculums that are offered through the Colleges at NEOMED with the support of reasonable accommodations and are engaged actively in their careers as pharmacists, physicians and scientists.

It is the policy of NEOMED to comply with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and any state and local requirements regarding persons with disabilities. Under these laws, no otherwise qualified individual with a disability shall be denied access to participation in services, programs or activities of the University solely by reason of his or her disability. The protections under Federal law apply to individuals with substantial impairments affecting one or more major life activity (e.g., walking, seeing, speaking, breathing, learning, working or performing manual tasks), those with records of such impairments, and those who are regarded as having such impairments.

As NEOMED is enriched by persons with disabilities in its student body and among the faculty and staff, it is important also to understand and support the needs and rights of these individuals. All students will be held to comparable performance standards and must be able to carry out the essential functions of their positions or programs with or without reasonable accommodation. Upon request of students with disabilities, the University will make efforts to provide reasonable accommodations; however, the University is unable to make accommodations that impose an undue burden, present a direct threat to the health or safety of others, or fundamentally alter the nature of its programs, services or activities.

The University strictly prohibits any form of retaliation against any student or applicant who requests an accommodation, reports or participates in the investigation of a complaint, or otherwise exercises rights secured by this policy.

Qualified students are encouraged to disclose known disabilities and to request accommodations as early as possible in order for the University to have adequate time to make reasonable accommodations. Students who do not disclose their disability and fail to request an accommodation until they have encountered academic difficulty may be jeopardizing their chances of successfully completing the program; accommodations will be considered and granted, as appropriate, on a prospective basis only. Students needing more information regarding the University Student Accessibility Services policy or procedures should contact the Assistant Director of the Learning Center and Accessibility.

To request disabilities accommodations, please complete and submit the Disability Registration and Accommodation Request Form available in the Office of Student Affairs or online at: <http://www.neomed.edu/learningcenter/accommodations>.

Definitions and Terms

Applicant

Any student admitted to the University and pursuing accommodations for a disability by submitting appropriate application materials to the University Student Accessibility Services Committee.

Disability

A physical or mental impairment that substantially limits one or more major life activities; the student has a record of such impairment or is regarded as having such impairment. Common disabilities include anxiety and anxiety-related disorders, attention deficit hyperactivity disorder, chronic illness, dyslexia and vision/hearing impairments. Disabilities may be permanent or temporary in nature (see Temporary Medical Conditions).

Discrimination

Limiting, segregating or classifying a student in a way that adversely affects the opportunities or status of such student based on his/her disability.

Learning Disabilities

A learning disability is a generic term that refers to a heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning or mathematical abilities.

Major Life Activities

The phrase “major life activities” refers to normal functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, eating, standing, bending, reading, concentrating, thinking, communicating, learning and working. It also includes operation of major bodily functions such as the immune system; normal cell growth; and digestive, bowel, bladder, brain, respiratory, circulatory, endocrine and reproductive functions.

Mental Impairment

A mental impairment includes any mental or psychological disorder such as a developmental disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Physical Impairment

A physical impairment includes any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory and speech organs,

cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin and endocrine.

Qualified Student

A student who meets the academic and technical standards (also known as essential functions) required for admission to, continued participation in and graduation from the program or activity with or without reasonable accommodation.

Reasonable Accommodation

A reasonable accommodation is any approved change to the way(s) in which the curriculum is delivered or student knowledge or proficiency is assessed that allows an individual with an approved disability to enjoy equal access to benefits available to other students in the educational setting. These accommodations or modifications allow the qualified individual with a disability, equal access to participation as a student in the various academic programs of the University. An accommodation is considered reasonable if it does not:

- (A) fundamentally alter the course or program;
- (B) compromise the essential requirements of a course or activity (for example, extra time would not be approved relative to a time-sensitive skill or experience);
- (C) compromise safety to self, any students, patients or others; and/or
- (D) cause an undue hardship for the University.

Services of a personal nature, such as tutoring and typing, are not considered a reasonable accommodation for postsecondary institutions under the ADA.

Temporary Medical Conditions

Temporary medical conditions (e.g., pregnancy, broken bone, surgery) are not considered to be disabilities under the ADA. However, in the case of a temporary medical condition that is verified by an appropriate diagnosing professional, the University will make attempts to support students in a reasonable manner, as appropriate, within the required curriculum. If you have a temporary medical condition, please consult with the Office of Student Affairs.

Undue Hardship

An undue hardship results when an accommodation places significant administrative or financial burden on the University. Universities are required to provide a reasonable accommodation to qualified individuals with disabilities, unless the accommodation creates an undue hardship. These hardships include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the University's operation.

University Student Accessibility Services Committee

The University Student Accessibility Services Committee is a recognized Standing Committee of NEOMED. The Committee serves as the review and approval body for student requests for disabilities accommodations in compliance with the ADA and state and local requirements regarding persons with disabilities. The Committee oversees and adheres to related University policy to ensure that efforts to provide reasonable accommodations to not impose an undue burden, present a direct threat to the health or safety of the student or others, or fundamentally alter the nature of its programs, services or activities. The Committee is co-chaired by faculty from the College of Medicine and College of Pharmacy, at least one of which must have a

College of Graduate Studies faculty appointment. Committee members include representatives from the College of Medicine, College of Pharmacy and College of Graduate Studies, and they are supported by representatives from Enrollment Services, Academic Services and Student Affairs. More detailed information is available in the University Bylaws, Appendix G.

College of Medicine Essential Functions

The primary mission of the College of Medicine (COM) is to provide all students with the training to become qualified physicians oriented to the practice of medicine at the community level. As such, faculty are responsible to develop and implement a medical curriculum designed to educate humane physicians for the highest standards of the practice of medicine.

Preparation and training to become a physician requires each student to understand and to meet the Essential Functions Required for Admission, Continuation and Graduation identified below with or without accommodations. The faculty has developed the course requirements and activities to provide critical elements of physician training. It is expected that students will participate in all course activities (including but not limited to lectures, seminars, laboratories, clinics, physical examinations, patient procedures) and adhere to individual hospital rules and regulations as well as COM policies regarding these activities. Learning is based on active student participation rather than simple observation and/or note taking.

A candidate for the Doctor of Medicine degree must be able to demonstrate intellectual-conceptual, integrative and quantitative abilities; skills in observation, communication, motor functions; and mature behavioral and social attributes. Technological compensation can be made for some disabilities in certain areas, but a candidate should be able to perform in a reasonably independent manner without a trained intermediary. (The use of a trained intermediary means that a candidate's judgment must be mediated by someone else's power of selection and observation.)

Observation

The candidate must be able to observe demonstrations and experiments in the basic sciences, including but not limited to physiologic and pharmacologic demonstrations in animals, microbiologic cultures, and microscopic studies of microorganisms and tissues in normal and pathologic states. A candidate must be able to observe examinations and procedures in the clinical environment, and be able to read test results such as electrocardiograms (EKG) and x-rays. A candidate must be able to observe a patient accurately at a distance and close at hand. Observation necessitates the functional use of the sense of vision and somatic sensation. It is enhanced by the functional use of the sense of smell.

Communication

A candidate must be able to communicate effectively in English, and to observe patients in order to elicit information, describe changes in mood, activity and posture, and perceive nonverbal communications. A candidate must be able to communicate

effectively and sensitively with patients. The candidate must be able to communicate effectively with all members of the health care team.

Motor

Candidates must have sufficient motor function to elicit information from patients by palpation, auscultation, percussion and other diagnostic maneuvers that comprise a complete physical examination. A candidate must be able to perform the basic and advanced clinical procedures that are requirements of the NEOMED College of Medicine curriculum. A candidate must be able to execute motor activities reasonably required to provide general care, to perform diagnostic procedures and to provide emergency treatment to patients. Examples of emergency treatment and motor functions reasonably required of physicians include but are not limited to:

- performing cardiopulmonary resuscitation/basic life support (CPR/BLS) and advanced cardiac life support (ACLS), and applying pressure to stop bleeding,
- administering injections, and starting intravenous lines and administering intravenous medication,
 - making incisions, suturing and tying knots,
- performing diagnostic procedures and examinations such as fundoscopic, otoscopic, breast, rectal and pelvic examinations. Such actions require coordination of both gross and fine muscular movements, equilibrium, and functional use of the senses of touch and vision.

Intellectual-Conceptual, Integrative, and Quantitative Abilities

These abilities include measurement, calculation, reasoning, analysis and synthesis. Problem solving, the critical skill demanded of physicians, requires all of these intellectual abilities. In addition, the candidate must be able to comprehend three-dimensional relationships and to understand the spatial relationships of structures.

Behavioral and Social Attributes

A candidate must possess the emotional health required for full utilization of intellectual abilities, the exercise of good judgment, the prompt completion of all responsibilities attendant to the diagnosis and care of patients, and the development of mature, sensitive and effective relationships with patients. Candidates must be able to tolerate physically taxing workloads and to function effectively under stress. They must be able to adapt to changing environments, to display flexibility, and to learn to function in the face of uncertainties inherent in the clinical problems of many patients. Commitment to excellence, service orientation, goal setting skills, academic ability, self-awareness, integrity and interpersonal skills are all personal qualities that are assessed during the admission and education process. Because the nature of medical education is based on a mentoring process, candidates are expected to be able to accept criticism and to respond by appropriate modification of behavior.

College of Pharmacy Essential Functions

The mission of the College of Pharmacy is to prepare highly skilled pharmacists who play an indispensable role in a team-oriented approach to patient care and medication management services. As such, the faculty is responsible for development and implementation of a pharmacy curriculum designed to educate competent, caring pharmacists with strong communication skills, character, commitment to the community, and dedication to lifelong learning.

Preparation and training to become a pharmacist requires each student to understand and to meet the Essential Functions Required for Admission, Continuation and Graduation identified below with or without accommodations. The faculty has developed the course requirements and activities to provide critical elements of training. It is expected that students will participate in all course activities and must not be subject to any legal condition that would bar participation (including but not limited to lectures, seminars, laboratories, clinics, physical examinations, patient procedures) and adhere to individual clinical site rules and regulations as well as College of Pharmacy policies regarding these activities.

A candidate for the Doctor of Pharmacy degree must be able to demonstrate intellectual-conceptual, integrative and quantitative abilities; skills in observation, communication and motor functions; and mature behavioral and social attributes. Technological compensation can be made for handicaps in some of these areas, but a candidate should be able to perform in a reasonably independent manner without a trained intermediary. A trained intermediary is an individual who might or does mediate a candidate's judgment through his/her power of selection and observation.

Observation

Candidates must be able to read information on a computer screen and observe demonstrations and experiments in the basic sciences, including but not limited to: physiologic and pharmacologic demonstrations, microbiologic cultures, and microscopic studies of microorganisms and tissues in normal and pathologic states. Candidates must be able to observe a patient accurately at a distance and close at hand. Observation necessitates the functional use of the sense of vision and somatic sensation and is enhanced by the functional use of the sense of smell. Candidates must remain fully alert and attentive at all times in clinical settings and be able to evaluate patient signs and symptoms for the purpose of triaging patient complaints and monitoring drug therapy.

Communication

Candidates must be able to speak, listen, read and write in the English language in order to communicate effectively with instructors and peers. They must be able to communicate effectively and sensitively with patients and caregivers, including the ability to elicit information, describe changes in mood, activity and posture, and perceive nonverbal communication. Candidates must be able to instruct patients on the use of drug administration devices (e.g., inhalers) or use of home diagnostic kits. A candidate must be able to communicate effectively with other healthcare practitioners as related to verbal and written recommendations for drug therapy orders.

Motor

Candidates should have sufficient motor function to: execute all aspects of processing of drug orders and compounding of medications; engage in safe and aseptic handling of sterile preparations; and safely and effectively operate appropriate equipment (e.g., microscope, computer keyboard, glucose monitors, peak flow meters). Candidates must be able to perform CPR and engage in basic physical assessment activities including palpation, auscultation, percussion and other diagnostic maneuvers. Such actions require coordination of both gross and fine muscular movements, equilibrium, and functional use of the sense of touch and vision.

Intellectual-Conceptual, Integrative and Quantitative Abilities

Candidates should be able to comprehend three-dimensional relationships and understand the spatial relationships of structures. They must be able to solve problems in a multi-task setting that involve measurement, calculation, reasoning, analysis, synthesis and evaluation.

Candidates should be able to synthesize knowledge and integrate the relevant aspects of a patient's history, physical findings and monitoring studies in order to develop a drug therapy and monitoring plan in a reasonable amount of time.

Behavioral and Social Attributes

Candidates must possess the emotional health required for full utilization of their intellectual abilities, the exercise of good judgment, and the punctual and safe completion of all responsibilities. They must be able to accept appropriate suggestions and criticism and, if necessary, respond by modification. Candidates must be able to adapt to changing environments, display flexibility, and learn to function in the face of uncertainties and in situations of physical and emotional stress. Candidates must demonstrate ethical behavior and exercise good judgment in the completion of patient care responsibilities. They must possess interpersonal skills that promote mature, sensitive and effective relationships with patients, including compassion, integrity, motivation, empathy and concern for others.

Student Rights and Responsibilities

Students with disabilities have the right to:

- (A) equal access to courses, programs, services, jobs, activities and facilities available throughout the University;
- (B) reasonable and appropriate accommodations that are legally mandated, as determined on an individual basis; and
- (C) appropriate confidentiality of all information pertaining to their disability.

Students with disabilities have the responsibility to:

- (A) meet their College's qualifications and essential technical, academic and institutional requirements, with or without reasonable accommodations;
- (B) meet the requirements of each academic course or clinical experience, with or without reasonable accommodations;

- (C) provide required documentation of the disability in a timely manner, if accommodations are being requested;
- (D) follow the University's procedures for obtaining accommodations, academic adjustments, and/or auxiliary aids in a timely manner;
- (E) discuss accommodations with faculty and deal with faculty concerns in a collaborative spirit; and
- (F) discuss with faculty and/or the dean any problems that arise, as soon as possible.

Guidelines for Students with Disabilities

Determination of Eligibility

NEOMED is committed to equal opportunity and challenge for all academically qualified students and does not discriminate on the basis of disability. Accommodations are available to encourage students with disabilities to take full advantage of the University's educational, social and cultural opportunities.

The Learning Center, located in the Office of Student Affairs, is responsible for the coordination of programs and services for qualified applicants for admission and enrolled students with disabilities. Determination of eligibility for services and appropriate accommodations is determined by the University Student Accessibility Services Committee (hereafter referred to as "Committee") and supported by the staff of the Learning Center after review of documentation of disability. As needed, Learning Center staff will discuss the student's request for services with the student to assist in determining appropriate accommodations and/or consult with the faculty member or other involved office regarding the request. When there is any question about the appropriateness of the student's requested accommodation, the Learning Center staff member will inform the student of the decision.

All accommodation requests will be presented by Learning Center staff to the Committee on an as-needed basis as part of the accommodations eligibility and approval process. If the Committee requires additional information and/or documentation, Learning Center staff will contact the student via email for the request. The student may be asked to attend a Committee meeting to answer further questions that the Committee may have regarding the requested accommodation.

Applying for and Requesting Support Services

All students seeking accessibility services from the Learning Center must disclose the presence of a disability. In most cases, the student will be asked to submit documentation of disability for review by the appropriate Learning Center staff person prior to submission to the Committee. Upon receipt and review of the documentation, an intake appointment may be scheduled. Students should provide their contact information with the documentation to facilitate the scheduling of this appointment with the Assistant Director of the Learning Center and Accessibility, in the Office of Student Affairs, Northeast Ohio Medical University, email accommodations@neomed.edu, or call 330.325.6735.

Intake Appointment (Optional)

After review of documentation, Learning Center staff may contact the student for an intake appointment. During this meeting, the student's eligibility for accommodations and anticipated needs will be discussed. Policies and procedures regarding specific accommodations will be discussed; however, no decisions about any accommodation will be made at this time.

Requesting Specific Accommodations

Requests for accommodations coordinated by the Learning Center are made by completing and submitting a Disabilities Registration and Accommodations Request Form. The form can be found online at: <http://www.neomed.edu/learningcenter/accommodations>.

Submit the form to the Assistant Director of the Learning Center and Accessibility, via email at accommodations@neomed.edu or via fax at 330.325.5956. It is the responsibility of the student to request specific accommodations each year via the form. Please remember that accommodations can occur only after a student requests the accommodation by submitting the appropriate documentation for review by the Committee to determine eligibility for specific services. Each request is considered on an individual basis and any approved accommodations are based on the Committee's review of the request, the specific disability, and the documentation provided in support of the foregoing.

Students should be aware of the following considerations.

(A) Academic Adjustments

Academic requirements may be modified, as necessary, to ensure that they do not discriminate against qualified applicants or currently enrolled students with disabilities. At the student's request, Learning Center staff will confer with the Committee to recommend academic adjustments in compliance with legal mandates. Academic adherence to requirements that are essential to programs of instruction are not considered discriminatory.

Accommodations that modify the curriculum shall not affect the substance of the educational programs or compromise educational standards. Because of the diversity of individual needs relating to disabilities and the uniqueness of each class, students may discuss their requests for course modifications with their instructors, if appropriate, only after approval by the Committee.

(B) Clinical Rotations and Off-campus Teaching Sites

Once granted admission, students who have a disability and who seek an accommodation that involves a teaching site other than the Rootstown Campus also must identify their disability and accommodation request in writing. Students should initiate the process as soon as possible, as significant time may be necessary to evaluate documentation, to coordinate specific accommodations, and to work out arrangements at off-campus teaching sites.

Accommodation needs for clinical rotations must be requested and coordinated well in advance. For this reason, students should meet with Learning Center staff as soon as possible when accommodations are being requested for a clinical setting. Learning Center staff can coordinate with the chair of the Committee, the course director and the affiliated institution(s) to ensure that reasonable accommodations are in place prior to the start of a clinical activity.

- (C) Administration of Rootstown-based Standardized Assessments – College of Medicine Accommodations may be available to medical students for standardized assessments administered on the Rootstown campus and are under the purview of the National Board of Medical Examiners (NBME).

Based on NEOMED approval of an accommodation for a distraction-reduced testing environment, the same will be granted to students for NBME examinations, upon request, using proper accommodation request procedures.

Based on approval by the Association of American Medical Colleges (AAMC) and the NBME for an increase in time for AAMC- and NBME-administered examinations, the same will be granted, upon request and using proper documentation procedures, given the following conditions: 1) students who have received increased time by the AAMC for the MCAT examination may be considered for a comparable increase for NBME examinations administered on the Rootstown Campus during the M1 and M2 years, and 2) students who have received increased time by the NBME for the USMLE Step 1 examination may be considered for a comparable increase for NBME examinations administered on the Rootstown Campus during the M3 year.

Timeliness of Requests

In general, requests for accommodations take a minimum of two (2) weeks to process. Requests for accommodations for curriculum-related activities that occur outside of the NEOMED Rootstown Campus may take up to six (6) weeks to process. Students are encouraged to submit their request at the beginning of the academic year. All requests, if appropriate, must be reviewed on an annual basis by the Committee.

The Learning Center Availability

Staff from the Learning Center are available to consult with students on an appointment basis, Monday through Friday, 8:00 a.m. to 5:00 p.m. Other hours may be available by special request. To ensure that a staff member is available and has adequate time for consultation, students should email or call to schedule an appointment.

Procedures for Requesting an Accommodation

- (A) It is the student's responsibility to disclose a disability and to provide adequate documentation of the disability and any requested accommodations with a rationale of how the accommodation addresses the disability.
- (B) The first step in requesting disability related services is to provide current documentation of the disability by an appropriate diagnosing professional (a treating, licensed, clinical professional familiar with the history and functional implications of the impairments and who is currently engaged in treating the student). Forms for helping students do this are

available on the website at <http://www.neomed.edu/learningcenter/accommodations> (last accessed August 10, 2018).

What is considered “current” varies and can mean many years such as with a chronic medical condition, to a few months with some psychological disorders. Send completed materials to the Office of Student Affairs. Electronic completed materials may be emailed or faxed to the Assistant Director of the Learning Center and Accessibility (email: accommodations@neomed.edu; fax: 330.325.5956). Students will receive an acknowledgment of the receipt of materials via email. After students have received the acknowledgment that the University has received the materials, students are encouraged to schedule an appointment with the Assistant Director of the Learning Center and Accessibility to discuss documentation and needs. To schedule an appointment, please email accommodations@neomed.edu.

- (C) Through a collaborative process with students, the Assistant Director of the Learning Center and Accessibility will determine when the need for disability accommodations is adequately documented knowing that the Committee may request additional documentation. The Assistant Director of the Learning Center and Accessibility may choose to consult with professionals about the disability while maintaining student anonymity at this time. Documentation will be presented to the Committee for further consideration. The Committee meets on at least a quarterly basis or more frequently as-needed. The Committee will review materials and decide if students will be granted disability status and if so, what will be offered as reasonable accommodations. Because it will take time for each Committee member to review materials, students must complete materials in time to have the completed submission of acceptable materials to the chairs of the Committee no later than one week before the Committee meets. It is suggested that students submit materials well before this date. Materials from students received after the deadline may be referred to the Committee for the next quarterly meeting and may result in a delay.
- (D) All disability determinations are made by the Committee. Students may be invited to attend a Committee meeting should the Committee have any questions about the stated disability or requested accommodation. Because this is not a legal hearing, students may not bring legal counsel representation into the meeting. The Committee may require further examination and/or testing by a professional approved by the University. Any costs incurred in obtaining additional documentation are incurred by the student. The Committee may grant limited accommodations or no accommodations until further assessment is completed. Committee meetings are confidential, and Committee members are authorized to review all individual student information available to them when considering a student’s accommodation request. Once an accommodation is granted, it is the student’s responsibility to present information about an accommodation (with written documentation) directly to the course director and/or faculty impacted by the accommodation. To request official documentation on accommodations to share with impacted course directors, contact the Assistant Director of the Learning Center and Accessibility at accommodations@neomed.edu.

- (E) Accommodations may be denied for any of the following reasons:
- (1) Outdated documentation
 - (2) Insufficient information
 - (3) Incomplete application (e.g., no diagnosis or signatures)
 - (4) Documentation provider possesses a conflict of interest (e.g., relative of the student)
 - (5) Inappropriate professional making the diagnosis (i.e., credentials must include licensure associated with that of a qualified expert in the disability or condition)
- (F) After the Committee meets, students will receive a communication indicating the Committee's response to the request. If students are entitled to accommodations, the Committee will provide a letter regarding the accommodations for the student to, in turn, provide to faculty, staff or other administrators who have a legitimate educational interest in the nature of the accommodation needs. Mechanism of clinical teaching site notification will be part of the discussion. It is important to note that only specifics regarding the accommodation are included in the letter; the letter does not include any information specific to the student's disability.
- (G) Students can appeal if they are not satisfied with the Committee's decision. The appeal must be based on one of the two following criteria – new information or procedural error. Disagreement with the Committee's decision shall not constitute the sole reason for the appeal. In addition, information available to or known by the student at the time the original decision was made by the Committee cannot serve as the basis for reconsideration, but may be appropriate for a new request to the Committee. An accommodation that is granted as the result of an appeal is not retroactive and may only affect future circumstances.

If the student has new, significant and compelling information that was not available for presentation at the time of the original review and decision, or believes there was a procedural defect, he/she may submit an appeal. To do so, the student must submit the request for an appeal to the Vice President of Academic Affairs (VPAA) within 10 working days of notification of the original Committee decision. The request, in writing, must state the new information or procedural error alleged to have occurred when the Committee's decision was made. The review will occur within 10 working days of receipt of the appeal. The student may be invited to discuss the appeal in person with the VPAA. Students who appear at an appeal meeting with the VPAA may be accompanied by a member of their choosing from the NEOMED or University affiliate faculty, staff or student body who is not a relative or an attorney, as this process is academic, not a legal hearing. The VPAA will render a decision within 10 working days that may include reconsideration of the matter by the Committee.

- (H) Although students are encouraged to attempt to resolve grievances using the University process specified above, they have the right to file any grievance directly with the Office of Civil Rights (OCR). Complaints filed with the OCR must be filed within 180 days from the time the incident occurred.