Information for Faculty and Academic Staff on Effective Accommodations for Placements, and Practicums

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The Tri-Campus Accessibility Offices would like to thank the University of Toronto Lockstep Committee and its many members from across the professional faculties and divisions of the University for their extensive contributions and valuable feedback to this document.

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Introduction

Over the past 30 years, considerable thought has been put into reasonable accommodations for students with disabilities in postsecondary institutions. Appropriate accommodations for the classroom might not fulfill the essential requirements in a practicum or placement. For some students, the demands of a clinical environment reveal unexpected disability-related issues that might not have required accommodations in the past.

These challenges might include:

- the volume of new information
- the variety of complex settings and expectations
- adapting to different supervisors with different supervisory styles and expectations
- less predictability and varying degrees of structure
- absences for disability-related reasons may adversely impact colleagues, professional clients and patients
- disclosure issues: Who to disclose to? What to disclose? When to disclose?
- managing externally imposed deadlines
- ensuring client care

Students with disabilities are encouraged to register with The Office for Students with Disabilities (OFSD) and negotiate practicum/placement accommodations well before classes begin. Sometimes, difficulties cannot be anticipated and creative problem-solving is required. It's important to contact a student's accessibility advisor when problems first arise, so they can be addressed before the student experiences a failure.

Academic Accommodations: The Basics

Types of disabilities

Students registered with OFSD may be registered in any of the following disability categories: D/deaf, deafened or hard of hearing, low vision or legally blind, mobility or functional limitations, mental health issues, learning disability, attention deficit hyperactivity disorder, autism spectrum disorder, concussion, brain injury or other medical conditions.

Students may also be registered for temporary disabilities such as a broken limb or short-term impairment after medical treatment or surgery. Assistance can be given for on-campus transportation and completing academic work.

Accommodations

Academic accommodations are provided when students experience disability-related barriers to demonstrating their knowledge and skills. Accommodations provide equitable access for students with disabilities to meet the academic standards of their program.

A student may have a disability and not require accommodation. For example, a student with a chronic health disability that is managed well by medication, diet and appropriate coping strategies may decide not to register. On the other hand, a student might register but not use their accommodations until they are required, due to a change in their health.

Essential requirements

Accommodations must help a student meet the essential requirements of a program. *"An appropriate accommodation enables a student to successfully meet the essential requirements of the program, with no alteration in standards or outcomes, although the manner in which the student demonstrates mastery, knowledge and skills may be altered."*[1]

Instructors play a key role by communicating what a student must know and demonstrate. When necessary, instructors assist with problem-solving based on their academic expertise. The question of fairness often comes up when providing students with alternate ways of performing academic tasks. Accommodations simply level the playing field so that students with disabilities can complete certain tasks differently, while still meeting the essential requirements of the curriculum.

[1] Ontario Human Rights Commission. (2004). *Guidelines on Accessible Education* (ISBN: 0-7794-7191-1). Toronto, ON: Canada.

Students with accommodations are expected to demonstrate the same knowledge and skill development as their peers. If you believe that implementing the accommodations listed in a student's Letter of Accommodation will compromise academic standards, contact the accessibility advisor listed at the bottom of the letter. In some circumstances, the nature and degree of disability may mean that no accommodation would enable an individual to meet the essential academic requirements or behavioural expectations of a course or program. In these cases, the University is not required to accommodate and may refuse to provide accommodations. However, all efforts must be made to provide all reasonable options.

Privacy & confidentiality

A student's specific diagnosis is private medical information under Human Rights Code guidelines. Under no circumstances should you ask a student to disclose this information.

The accommodations process follows the Freedom and Protection of Privacy legislation (FIPPA). This means that information can be shared on a need-to-know basis. OFSD will share information about the impact on the student's learning with the practicum coordinator. They may share relevant information with the preceptor.

While some students are willing to talk about their disability, many others might be reluctant to do so. They may fear being denied opportunities or creating unwanted curiosity or concern. Encourage students to talk about the impact of their disability on their learning.

Because any category of disability contains a wide range of differences in how someone functions, knowing a student's type of disability is not particularly relevant without the details provided during the intake process. This information includes other conditions, family and social supports, past experiences of learning, and areas of strength that can compensate for difficulties.

In rare circumstances, accommodations for one student may have an unanticipated impact on other students. If you have concerns about this, contact the accessibility advisor to help resolve the difficulties or to seek appropriate assistance.

Best practices in the accommodation process

Reasonable accommodations for practical settings are more complex than those for classrooms. A balance must be found between finding appropriate accommodation and ensuring that professional standards and licensing requirements are met. Demonstrated efforts to accommodate a student need to be made before further actions are considered.

In order to make effective accommodations, each professional program should have clearly outlined essential competencies. These essential competencies are normally linked to the licensing requirements of accrediting bodies. If these competencies are available during the admissions process, a student can evaluate whether or not this is the right program for them and ask questions to explore what accommodations might be possible.

When the required competencies are clearly defined, it helps the program, practicum/placement setting and student work through the learning objectives and assessment in each area. If a student fails to meet the competencies with appropriate accommodations, the program is in a position to take further action.

"Essential requirements" is a specific term used in human rights legislation, referring to the bona fide requirements of a task or program that cannot be altered without compromising the fundamental nature of the task or program. Determining what is an essential requirement and what is not is critical in distinguishing requirements that cannot be accommodated from what can and should be altered. Ontario Human Rights Commission (2003)

Helpful points to consider

- Essential competencies must be based on program requirements, not on ideas of successful candidates.

- Outlining the essential requirements and core competencies in all program and pre- admission materials is optimal.

- Acceptance letters should include information about OFSD and the accommodations process for students with disabilities.

- A statement about disability and the willingness to accommodate should be included on the syllabus of each course.

For example: To facilitate academic and co-curricular success, the Factor-Inwentash Faculty of Social Work is committed to providing accommodation support to students with documented disabilities. The Practicum Office will make reasonable efforts to ensure that appropriate supports are in place. Students requesting accommodations must be registered with OFSD.

- A link to Accessibility Service's website should be included on the department's website.

When determining the essential competencies of the program, consider doing a task analysis as outlined on the next page. The student's accessibility advisor can be a resource in working through these questions.

Examples of Core Competency Documents:

- UofT Faculty of Medicine: md.utoronto.ca/competencies

- UofT Occupational Therapy: ot.utoronto.ca/current/student-handbook/program-policies-regulations/essential-competencies

- Standford Medicine: med.stanford.edu/md-admissions/how-to-apply/technical-standards.html

Task analysis

(IDIA, The Role of Disability Service Professionals in Determining Essential Requirements, 2004)

- What is the purpose of the course?
- Is the competency integral to the learning of the course?
- Does the skill need to be performed in a prescribed manner?
- Would accommodations require a fundamental alteration to the nature of the program?
- What are the outcome variables that are absolutely necessary? Why?
- What methods of assessing outcome variables are absolutely necessary? Why?
- Is there only one way for the skills/knowledge to be demonstrated?
- Would there be any significant consequences if this skill is performed at varying levels of competency?

Deciding on appropriate accommodations

It is important to engage in **an interactive process** to determine the optimal and most appropriate accommodations for individual students. Based on the student's functional limitations outlined within the medical documentation, the accommodations process should involve the Accessibility Service advisor, faculty involved in coordinating practicums, staff in clinical/practicum sites and the student.

Experts in various aspects of disability may need to be consulted to determine what is required.

For example, when a student has a physical disability, an occupational therapy/physical therapy/ergonomic assessment may help determine what adaptive equipment and furniture could assist the student and to identify any safety concerns regarding the student's functional limitations.

Factors to consider in this process include:

- functional limitations arising from the disability
- previous accommodations
- task analysis
- essential requirements
- student input into what works for them and what doesn't
- anticipated barriers

For example, if a student has a hearing impairment and is going to be working in a busy clinic or hospital environment, specific accommodations, sign language interpreters and adaptive technology need to be arranged well in advance.

Particular placements may be more suitable if a student needs to be absent for medical appointments or if additional time is required to demonstrate a skill or complete notes.

Key questions to ask when collaboratively determining appropriate accommodations:

1. Will the proposed accommodations result in a failure to meet any essential requirements of the program?

Example:

A professional program has a requisite number of hours a student has to complete for program requirements.

The student has an accommodation for 'absences as necessary for disability related reasons,' and has missed an excessive amount of clinical hours that cannot be made up in any way.

This may result in a failure to meet essential requirements of the program because the required clinical hours have not been met.

2. Will the accommodations legitimately jeopardize the safety of others?

Examples:

A student with a visual impairment or a physical disability may have difficulty ensuring client safety. Would it be viable to have an assistant in this case?

A Masters of Teaching student who is legally blind will have difficulty in meeting safety standards for primary aged children. Would it be possible to have an aide in the classroom to address this?

A Pharmacy student with dyslexia may make errors with numbers when dispensing medication. However, if the student has set up an effective self-checking system and there are no demonstrated errors, one cannot assume that there may be harm to patients.

Before concluding that there are safety concerns, creative accommodation possibilities must be considered.

3. **Would the accommodations fundamentally alter the education program?**

For example:

Some students benefit from a longer learning period before they acquire the required skills. While logistically this can present difficulties, the essential skill requirements can be met by the student.

If the number of patients/ clients seen per day is reduced and the placement is extended, the learning experience of the placement is not fundamentally altered.

4. **Has a fair process taken place? Before determining that accommodations can't be made without compromising academic integrity, a well-documented, fair process must take place to determine what accommodations may be possible.**

Example:

A student with ASD who experiences considerable anxiety may find it very difficult to cope with the uncertainties of a clinical environment, particularly one that is unstructured.

Accommodations for this student might include:

- choosing an appropriate setting e.g. chronic rather than acute care
- visiting the site as an observer prior to beginning the program
- having a designated mentor and weekly sessions to review cases
- providing feedback in writing
- referring the student to counselling and coaching support

Things to keep in mind when collaboratively determining appropriate accommodations:

Accommodations need to be flexible and may need to be adjusted within different settings.

Every accommodation and recommendation to the student must be well documented. If the student cannot meet essential requirements after all the supports have been put in place, further action can be pursued.

The accessibility advisor should be involved when there are requests for accommodations that involve additional costs (adaptive furniture, equipment, software, service provision to access information). OFSD will facilitate the provision of necessary resources in consultation with academic departments.

The OHRC Policy on Accessible Education for Students with Disabilities, 2018 outlines the requirement that students requiring additional time to complete their academic studies should not incur additional costs.

Strategies and supports in clinical settings

Additional time and effort may be needed before the student reaches the required level of competency. Ways to support this learning include:

- Having a designated mentor with whom the student can meet on a regular basis to problem-solve, discuss concerns, discuss complex cases. This person should not be in a position to evaluate the student.

- Providing more opportunities to observe experienced clinicians in the community. If possible, providing an opportunity for the student to work in a similar setting prior to beginning a formal practicum/placement.

- Having protected time to read charts and write up case notes etc. This facilitates checking and re-checking procedures to reduce error, and allows time to follow up on patient issues needing attention. This also allows time to organize notes in a coherent, logical manner with all relevant information included.

- If a student is struggling academically and requires remediation, having a consistent person to meet with once or twice a week helps to establish a relationship and provides the basis for measuring progress more effectively.

- Having a modified case load, at least in the initial stages of a placement, if appropriate. As the student gains confidence and competence, this case load can be gradually increased until the student is able to maintain a full case load.

- Taking time away from a practicum so that the student has time to receive treatment, work on strategies, obtain equipment and be trained on it. Ways in which this time would be made up can be negotiated.

- Modifying the schedule/ reducing overnight hours to a 10 p.m. end time, and substituting a daytime weekend call. Some students may need a longer placement with reduced hours.

- Using simulation labs (sim labs) to provide learning opportunities and time for practicing and honing skills.

- Starting their placement two to three days earlier as an observer to allow the student extra time to familiarize themselves with the environment, routines etc.

- Introducing Adaptive technology to help compensate for some deficits or to enhance learning. Eg, Kurzweil (text-to-speech), Inspiration, a mind-mapping program, Live Scribe pen, Dragon Professional.

Roles in the accommodation process

Clinical/Practicum Faculty Members

- Students often first disclose a disability to a faculty member. When requested, engage in an interactive process with OFSD and the student to provide appropriate accommodations.

- Respond appropriately to the student's disclosure. Indicate a willingness to listen while maintaining the boundaries in your role as an educator who will be evaluating the student's performance. Only ask for information that will help you make a good referral. Remember that you are not in the role of medical practitioner.

- Refer students to OFSD and follow up with a written recommendation to this effect. Because licensing exams require a demonstrated history of receiving accommodations, informally accommodating a student is problematic.

- Play a role in implementing accommodations and deciding on the most appropriate placement setting. Discuss the most appropriate practicum setting based on what might be anticipated with a particular disability (e.g. a placement in chronic care vs acute care).

- Only provide accommodations specifically recommended by the student's accessibility advisor.

- Accommodate students with specific placement needs prior to any lottery systems being implemented to create an equitable playing field.

- Consult the student's accessibility advisor as soon as problems develop rather than waiting until the student is failing. Not all problems can be anticipated prior to the start of a placement.

- Respect the student's privacy. Do not inadvertently reveal confidential information about the student's registration with OFSD unless there is a need to know for accommodation purposes.

- Ensure that practicum and site coordinators implement accommodations in an appropriate and timely way, and maintain confidentiality.

- Document the decision process for accommodations within your department so there is evidence that all efforts have been made to support the student. (AS and faculty should do this after consulting with each other and coming to a resolution.)

- In determining whether a particular accommodation would compromise the academic integrity of a course or endanger safety, do a task analysis and ask key questions similar to those outlined above.

Role of OFSD

- Verify the presence of a disability on behalf of the University.

- Provide relevant information on the functional limitations of the disability on a need-to-know basis.

- Engage in the interactive process to determine appropriate accommodations.

- Facilitate accommodations for students.

- Support faculty and staff to assess and meet legal obligations. Act in the best interests of the student while also upholding the legal responsibilities of the University.

- Ensure due process has been followed by all parties to explore and provide reasonable and appropriate accommodations.

- Understand the functional limitations of the student's disability as well as the overall requirements of the professional program and the essential competencies of the program, demands, tasks and types of settings.

- Establish contact with clinical coordinators in individual programs.

Student's role in accommodation

- Initiate communication and register with OFSD.

- Provide requisite medical documentation about functional limitations from a medical practitioner able to speak to the disability, relevant treatments and recommendations (see OFSD website).

- Participate in the accommodations process. For example, identify accommodations that might assist in a particular setting, stay in contact with your accessibility advisor and alert them when problems arise. Follow through on recommendations.

- Inform accessibility advisor of upcoming placements/ practicums ahead of time.

Determining and implementing accommodations for Objective Structured Clinical Exams

Determining accommodations for an Objective Structured Clinical Exam (OSCE) is a collaborative partnership between the student, the accessibility advisor, the faculty member and academic staff members. This needs to take place well ahead of time as OSCE arrangements are frequently complex and time-consuming.

Process

Students should be encouraged to register with OFSD as soon as possible. This information should be included in acceptance letters, admission material, student handbooks and orientation sessions.

If a student is not registered with the OFSD and is requesting accommodations, the student should be directed to begin the registration process as soon as possible.

St. George: studentlife.utoronto. ca/as/new-registration

UTM: utm.utoronto.ca/ accessibility/future-uoft-students/documentation-requirements

UTSC: utsc.utoronto.ca/~ability/ registering_current.html

The student meets with their accessibility advisor to talk about accommodations for an OSCE.

The accessibility advisor will use the medical documentation outlining the student's functional limitations and their meeting with the student to determine what, if any, accommodations are reasonable for each section of the exam.

The accessibility advisor will contact the faculty member to understand each component before finalizing accommodations (as needed).

Examples of accommodations include:

- Extra time/reading software to read door notes.
- Students with motor problems may require an assistant or specialized equipment to perform a patient exam e.g. automatic blood pressure machine.
- Speech-to text software to dictate written report or extra time to do the write-up, breaks.
- Students with accommodations go first or last in the OSCE so ensure a steady rotation for other students.

Test and Exam Services does not administer the practical component of OSCEs, only the written component.

Talking with students about disability-related issues or distress

- Speak privately with the student.
- Be straightforward and factual in your approach.
- Outline what you've observed and describe the services available.
- Allow time for the student to think about what you've said.
- Recognize that the student may not know that support for functional limitations within the Canadian context is legally mandated.
- If you think a student may not understand what you're saying, summarize your points in written form.
- Allow time and space for the students to ask questions and to clarify what it is they need to know.

Registering with OFSD

- Students should consult their campus OFSD office for further information on the registration process:

  St. George Campus: studentlife.utoronto.ca/as/new-registration

  UTSC: utsc.utoronto.ca/~ability/registering_current.html

UTM: utm.utoronto.ca/accessibility/future-uoft-students/documentation-requirements

- Students complete the package and submit relevant documentation.
- Students meet with an accessibility advisor for an intake interview. This advisor will then work with the student moving forward.

Responding to distressed students

Instructors play an important role in recognizing a student in distress and supporting student wellness. Refer to the "Responding to Distressed Students" website for faculty and staff at studentlife.utoronto.ca/DistressedStudent.htm

The University of Toronto Student Mental Health Framework is another important resource in our efforts to provide students with the support and services needed to optimize their mental health and wellbeing.

Emergency

In case of emergency, please dial 911.

For 24/7 emergency on campus, please call University Campus Police:

- St. George | 416-978-2222
- UTM | 905-569-4333
- UTSC | 416-287-7333

Appendix: Legal Framework

Definitions

What is a disability?

There are many ways to define disability. The University of Toronto abides by the definition in the *Ontario Human Rights Code*, R.S.O. 1990, c.H.19:

- Any degree of physical disability, infirmity, malformation, or disfigurement (including chronic health conditions, sensory impairments, functional or mobility disabilities)
- A condition of mental impairment or developmental disability
- A learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- A mental disorder

The term *disability* covers a broad range and degree of conditions. The *Code* is not exhaustive and does not speak to the complex and intersectional lives that people with disabilities lead or to the strengths that students registered with our service demonstrate every day.

Duty to accommodate

The *Ontario Human Rights Code* guarantees the right to equal treatment in education without discrimination on the ground of disability. The University of Toronto has a duty and is committed to considering accommodations when:

- Accommodations are requested by a student
- We become aware of a student's accommodation needs in a reasonable time
- Accommodations do not cause undue hardship to the University (e.g., safety to self and others, cost and academic integrity of programs of study)

We will arrange appropriate, effective and respectful accommodations that level the playing field so that all students meet the same academic standards. Requests for accommodation are considered in good faith.

References

AAMC Webinar Series. Disability Law 101 – *What Faculty Need to Know About Student Accommodations*. hsmcoalition.org

AAMC/UCSF Report, *Accessibility, Inclusion, and Action in Medical Education: Lived Experiences of Learners and Physicians with Disabilities.* March 2018

Academic Accommodation for Students with Disabilities, U of T, PDAAD&C #18

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Meeks, L.M.& Jain, N.R. *The Guide to Assisting Students with Disabilities. Equal Access in Health Science and Professional Education*. New York: Springer Publishing Company, 2016.

Mishoe, D., &Montgomery, T. *Guidelines for Faculty who Work with Students with Disabilities* (Duke University and UCSF) https://creativecommons.org/licenses/by-nc-sa/4.0/

Policy and Guidelines on Disability and the Duty to Accommodate OHRC, (2001, revised 2009)

Policy on Preventing Discrimination based on Mental Health Disabilities and Addictions, OHRC (2014)

The Opportunity to Succeed: Achieving Barrier-Free Education for Students with Disabilities OHRC (2003)

Resources

Association of Medical Professionals with Hearing Loss – www.amphl.org

Canadian Association of Physicians with Disabilities – www.capd.ca

Coalition for Disability Access in Health Science and Medical Education – HSMcoalition.org

Council on Access, Prevention and Interprofessional Relations (American Dental Association) – altdentalcareers@ada.org

Exceptional Nurse – www.exceptionalnurse.com

National Organization of Nurses with Disabilitiies – www.nond.org

Society of Healthcare Professionals with Disabilities – www.disabilitysociety.org

Society of Pharmacists with Disabilities – www.pharmacistswithdisabilities.org

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