



DEPARTMENT: Administration
POLICY NAME: Student Disability Accommodations and Access
POLICY NUMBER:
OWNER: MSOM Administration
EFFECTIVE DATE: June 1, 2026

PURPOSE

This policy establishes a clear, equitable, and consistent process for evaluating and implementing accommodation-related requests, including disability-related, religious, culturally based accommodations, and pregnancy-related modifications under Title IX. The policy ensures equitable access to educational programs while preserving academic integrity, professional standards, technical standards, and while maintaining compliance with applicable federal and state law.

SCOPE

This policy applies to all applicants, admitted students, and enrolled students at Meritus School of Osteopathic Medicine and governs accommodation-related requests across academic, clinical, co-curricular, and institutional activities. This includes disability-related accommodations, religious accommodations, culturally based accommodation requests, and pregnancy-related modifications under Title IX when such requests affect participation in the educational program. Requests based on cultural practices are addressed through the religious accommodation framework where applicable.

AUTHORITY

This policy operates in compliance with:

- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990, as amended
- Title IX of the Education Amendments of 1972
- Title VII of the Civil Rights Act of 1964
- Providing Urgent Maternal Protections (PUMP) Act of 2022
- Maryland Human Relations Act
- COCA Continuing Accreditation Standards
- Applicable federal and state regulations



POLICY

- A. MSOM provides reasonable accommodations to qualified applicants, admitted students, and enrolled students with disabilities to ensure equitable access to educational programs and activities. A qualified individual is one who meets the academic and technical standards for admission, retention, or graduation with or without reasonable accommodation.
- B. Students must be able to meet MSOM Technical Standards, as amended from time to time, with or without reasonable accommodations. Accommodations that would fundamentally alter essential academic requirements, clinical competencies, or professional standards are not required. MSOM is not obligated to provide accommodations that eliminate essential functions of the educational program.
- C. Accommodation determinations occur through an individualized interactive review process based on the student's functional limitations, supporting documentation, and the essential requirements of the program. No standard accommodation exists for any specific diagnosis; each request is evaluated on its own merits.
- D. Accommodations apply prospectively from the date of approval and are not retroactive to prior academic performance or assessments. If an institutional delay in processing a timely request results in a student not receiving approved accommodations, the institution will determine appropriate remedial measures on a case-by-case basis.
- E. External testing organizations, including the National Board of Osteopathic Medical Examiners for COMLEX-USA, maintain independent accommodation criteria and processes. MSOM approval of accommodations does not guarantee approval by external entities. MSOM will, upon request, provide supporting documentation to assist students in applying for accommodations with external testing organizations. Students are responsible for initiating accommodation requests with external testing organizations and for meeting those organizations' application deadlines. Because external processes may require significant lead time, students are encouraged to begin the external accommodation request process well in advance of their anticipated testing date. SAS can provide guidance on external processes upon request.
- F. MSOM maintains the confidentiality of all disability-related, religious, and pregnancy-related accommodation information in accordance with FERPA, HIPAA where applicable, and applicable state law. Documentation is maintained separately from academic records. Information regarding approved accommodations is shared only with individuals who require the information to implement approved accommodations.
- G. MSOM does not discriminate on the basis of disability, religion, pregnancy, or related protected status in recruitment, admissions, academic evaluation, clinical education, or access to institutional programs, services, or activities. Requesting or receiving an accommodation will not adversely affect a student's admission, academic standing, or progression. Retaliation against any individual for requesting an accommodation, participating in the interactive process, or filing a complaint is prohibited.
- H. Disclosure of disability status is voluntary at all stages of the admissions and enrollment process. MSOM encourages early disclosure to facilitate timely accommodation, but no adverse inference will be drawn from the timing of a student's disclosure or request. MSOM's obligation to provide accommodations begin when the institution receives notice of a disability and need for accommodation. Students are encouraged to submit requests through the Office of Student Affairs



using the accommodation request form available on the MSOM website (preferred), or email to Accommodations@MSOM.org to ensure timely and effective processing.

- I. Students are responsible for any costs associated with obtaining external evaluations or documentation required to support accommodation requests. MSOM does not fund external evaluations. Documentation requirements will be tailored to the nature of the request, and MSOM will not require evaluations beyond what is reasonably necessary to establish the existence of a disability and the need for accommodation. MSOM may provide information regarding low-cost community resources upon request to students seeking accommodations.
- J. Service animals are permitted in accordance with the Americans with Disabilities Act while maintaining safety, infection control, and academic integrity. MSOM may ask whether an animal is required because of a disability and what task the animal has been trained to perform, but may not require documentation of training or certification. MSOM may require removal of animals that are not housebroken or not under the handler's control, and may restrict animal access in environments where safety or curricular integrity would be compromised, including anatomy laboratories and clinical sites. Emotional support animals are not service animals under the ADA and are not permitted in MSOM academic, clinical, or common institutional spaces.
- K. MSOM evaluates disability-related, religious, and culturally based accommodation requests using an individualized, case-by-case process, applying principles of equity, reasonableness, and preservation of essential program requirements. The specific evaluation criteria and documentation requirements vary by request type and applicable legal framework. Disability-related requests are evaluated under Section 504 and the ADA. Religious accommodation requests are evaluated under applicable federal and state nondiscrimination law. Pregnancy-related modification requests are evaluated under Title IX.

ROLES AND RESPONSIBILITIES

Student Accommodation Services:

- Serves as the primary point of contact for students regarding accommodations; Introduces the accommodation process during new student orientation;
- Reviews documentation and determines whether students meet eligibility criteria;
- Engages in the interactive process;
- Facilitates Accommodations Committee meetings, including identification and invitation of ad hoc members;
- The Accommodations Officer, or designee, shall issue all Notices of Accommodation;
- Maintains confidential accommodation records in a secure system separate from academic records; and
- Provides implementation guidance.

Faculty and Administrative Units:

- Implement the accommodations listed in the NOA;
- Maintain confidentiality of all accommodation-related information;



- Do not request diagnostic information from students;
- Report to Student Accommodation Services any informal accommodation requests or disability disclosures received from students; and
- Refer all accommodation questions or concerns to Student Accommodation Services.

Students

- Initiate requests, preferably through the formal request process;
- Provide appropriate documentation sufficient to support the request;
- Communicate changes in functional needs or circumstances that may affect approved accommodations;
- Follow institutional procedures for requesting, renewing, and implementing accommodations; and
- Notify Student Accommodation Services if approved accommodations are not being implemented.

PROCEDURE

A. Request Process

1. Student submits an accommodation-related request using the accommodation request form available on the MSOM website (preferred), by emailing Student Accommodation Services at Accommodations@MSOM.org, or by any other means of communication. Requests communicated through other channels, including to faculty or staff, will be forwarded to SAS for processing.
2. Student provides documentation. Disability-related requests require documentation from a qualified professional establishing the disability and functional impact. Religious accommodation requests require a written description of the religious belief, observance, or practice and the specific conflict with institutional requirements. Documentation requirements for each request type are published on the MSOM website.
3. Student Accommodation Services reviews documentation for completeness and, if sufficient, conducts an individualized review and engages in the interactive process with the student.
4. SAS presents complete files to the Accommodations Committee for determination.
5. The Accommodations Officer, or designee, issues a written determination to the student, including approved accommodations and/or any denied requests with rationale. For approved accommodations, the Notice of Accommodation is distributed to relevant faculty and administrators for implementation.
6. For accommodations involving clinical rotations, SAS will coordinate with the Office of Clinical Education to identify implementation requirements and any site-specific considerations before issuing the NOA.



B. Timelines

Student Accommodation Services will acknowledge receipt of a request within five (5) business days. Requests with complete documentation will be presented to the Accommodations Committee at its next scheduled meeting. The Committee meets no less than monthly during the academic year. Written determinations will be issued within five (5) business days following Committee action. Requests requiring implementation before the next scheduled Committee meeting may be reviewed through an expedited process, including electronic review or interim approval by the Accommodations Officer pending full Committee review. Students should submit requests when possible:

- At least twenty business days before examinations
- At least thirty days before the new academic year
- At least four weeks before clinical rotations

Requests submitted after these deadlines will be processed as expeditiously as possible, but MSOM cannot guarantee that accommodations will be in place by the requested date. Late submission does not constitute grounds for denial of a request. Requests arising during the academic year due to new conditions, injury, or changes in functioning are accepted at any time. Accommodations apply from the date of approval forward.

C. Duration

Accommodations may be approved as temporary, annual, or long-term, depending on the nature of the disability or condition and the level of functional stability. Duration is documented in the NOA. Students with time-limited approvals are responsible for initiating the renewal process prior to expiration. SAS will notify students at least thirty (30) days before an accommodation is set to expire. Failure to renew does not constitute a waiver of the right to request accommodations in the future.

D. Documentation Standards

Documentation requirements vary by request type. Disability-related requests require documentation from a qualified professional that:

- Establishes the diagnosis or condition;
- Describes current functional limitations in the educational context;
- Supports the connection between the condition and the requested accommodation; and
- Is sufficiently recent to reflect the student's current functioning.

Religious or culturally based requests do not require medical documentation. Students must provide a written statement describing the sincerely held belief, observance, or practice and the specific conflict with institutional requirements. Pregnancy-related modification requests require documentation from a treating healthcare provider when the requested modification is based on a medical condition related to pregnancy, childbirth, or recovery. Requests for basic protections under Title IX, such as excused absences for prenatal appointments, do not require medical documentation.

All documentation submitted to Student Accommodation Services is confidential and is maintained separately from academic records. Diagnostic information is not disclosed to faculty, clinical preceptors, or administrators.

MSOM will not require documentation beyond what is reasonably necessary to establish eligibility and the need for accommodation. MSOM may request updated documentation when a material change in



circumstances warrants reassessment or when a time-limited accommodation is being considered for renewal.

E. Appeals

- Initial/first-level appeal must be submitted to SAS Appeals Committee within ten (10) business days of receiving the written determination. The appeal must state the specific grounds, which are limited to: (a) a procedural error that materially affected the outcome; (b) new documentation or information not available at the time of the original determination; or (c) an accommodation determination that is inconsistent with applicable law or institutional policy.
- The SAS Appeals Committee will issue a written response within five (5) business days.
- Secondary appeal submitted to the Dean within ten business days of receiving the first-level decision.
- Dean issues final written determination within fifteen (15) business days. The Dean's decision is final and exhausts the institutional appeal process.

F. Grievance Process

The appeal process above addresses disagreements with accommodation determinations. Students who believe they have experienced disability-based discrimination, retaliation for requesting accommodations, failure to implement approved accommodations, or a breach of confidentiality may file a complaint through MSOM's institutional grievance process as set forth in the Grievances and Appeals Policy.

Filing a grievance does not require exhaustion of the accommodation appeal process, and pursuing an appeal does not preclude filing a grievance. The two processes may proceed concurrently.

Students may also file complaints directly with the U.S. Department of Education Office for Civil Rights, the U.S. Department of Justice, the Maryland Commission on Civil Rights, or other applicable agencies at any time. Use of institutional processes is not a prerequisite to filing an external complaint.

DISABILITY ACCOMMODATIONS

A. MSOM provides reasonable accommodations to qualified students with disabilities that address functional limitations in the educational environment. Accommodations are individualized and may include, but are not limited to: extended time on examinations, distraction-reduced testing environments, assistive technology, accessible course materials, modified attendance requirements when attendance is not an essential function, preferential seating, recording of synchronous sessions, sign language interpreters or captioning, and temporary accommodations for acute or fluctuating conditions.

B. The foregoing list is illustrative and does not limit the accommodations that may be considered through the interactive process. Accommodations not listed above may be approved when supported by documentation and consistent with the essential requirements of the program.



C. MSOM is not required to provide accommodations that would fundamentally alter the essential academic, clinical, or professional requirements of the educational program, that would pose a direct threat to the health or safety of the student or others, or that would impose an undue burden on institutional operations. Determinations of fundamental alteration are made by the Associate Dean for Academic Affairs in consultation with relevant faculty and the Accommodations Committee, and are documented in writing with specific rationale.

D. When a requested accommodation is denied, SAS will engage in the interactive process with the student to identify effective alternative accommodations that address the student's functional limitations without compromising essential program requirements.

E. Students with temporary disabilities, including but not limited to injuries, surgical recovery, or acute medical conditions, are eligible for time-limited accommodations through the same process. Documentation should address the expected duration and trajectory of the condition.

F. Students whose disabilities involve fluctuating or episodic functional limitations are eligible for accommodations that account for variability in functioning. NOAs for episodic conditions may include contingency accommodations that are activated when the student's condition warrants, without requiring a new request for each episode.

G. Accommodations do not retroactively alter grades, assessments, or academic decisions. Students who believe that the absence of accommodations affected prior academic performance may discuss available remedial options with SAS, but MSOM is not required to provide re-examination or grade modification for periods preceding approval of accommodations.

RELIGIOUS ACCOMMODATIONS

A. MSOM provides reasonable accommodations for sincerely held religious beliefs, observances, and practices that conflict with institutional requirements, including but not limited to academic schedules, examination dates, clinical rotation schedules, dress code requirements, and laboratory or clinical participation requirements.

B. Students requesting a religious accommodation must identify the specific belief, observance, or practice and the specific institutional requirement that creates a conflict. Medical documentation is not required. SAS requests a written statement from the student describing the religious basis for the request, but will not evaluate the validity of the student's religious belief. The inquiry is limited to whether the belief is sincerely held.

C. Religious accommodation requests are evaluated on a case-by-case basis. MSOM will grant the requested accommodation unless it would create an undue hardship on institutional operations, compromise essential academic or clinical requirements, or jeopardize patient safety. When the specific accommodation requested cannot be provided, SAS will work with the student to identify an effective alternative, if possible.

D. Religious accommodations related to the Clinical Skills or the Osteopathic Principles and Practice curriculum, including requirements involving physical contact with students of different genders, will be evaluated through the interactive process. MSOM recognizes that religious beliefs may affect a student's ability to participate in certain physical examination or OMM laboratory exercises. Accommodations will



be considered provided they do not fundamentally alter the essential learning objectives of the curriculum or compromise the student's ability to meet technical standards.

E. Religious accommodations for clinical rotations are coordinated with clinical education sites in the same manner as disability-related accommodations. MSOM will make reasonable efforts to coordinate religious accommodations with clinical sites, but cannot guarantee that every site will implement every accommodation. Alternative clinical placements will be considered when a site is unable to accommodate.

F. Students who anticipate recurring religious conflicts with the academic calendar, such as weekly Sabbath observance or annual religious holidays, are encouraged to submit requests at the beginning of each academic year to allow for proactive scheduling.

PREGNANCY-RELATED MODIFICATIONS UNDER TITLE IX

A. MSOM prohibits discrimination on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery from any of these conditions. Pregnant and parenting students retain full access to educational programs and activities.

B. MSOM will provide reasonable modifications to policies, practices, and schedules for students affected by pregnancy or related conditions. Modifications are determined through the interactive process and may include, but are not limited to: excused absences for prenatal and postnatal medical appointments, modified examination schedules, temporary modifications to clinical rotation assignments, seating or physical environment adjustments, and breaks during classes or examinations as medically necessary.

C. Students experiencing pregnancy or related conditions are not required to disclose their pregnancy to faculty, clinical preceptors, or administrators. Disclosure to SAS for purposes of requesting modifications is voluntary. No adverse inference will be drawn from the timing of disclosure.

D. Requests for basic protections — including excused absences for medical appointments and access to lactation space — do not require medical documentation. Requests for more extensive modifications, such as reduced clinical schedules, extended examination time, or temporary leave, may require documentation from a treating healthcare provider addressing the medical basis for the modification and its expected duration.

E. MSOM will not require a student to obtain medical clearance before returning to or continuing in the educational program unless the same requirement is applied to students with other temporary medical conditions requiring similar accommodation. A student's ability to participate in classes, examinations, or clinical activities is presumed unless the student requests a modification indicating otherwise.

F. MSOM will not require a pregnant student to take a leave of absence if the student wishes to continue participating in the educational program, provided the student can meet essential academic and technical requirements with or without reasonable modification.

G. A student who takes a medically necessary leave of absence related to pregnancy, childbirth, or recovery will be reinstated to the same academic status held when the leave began. The duration of medically necessary leave is determined by the student's healthcare provider. Pregnancy-related leave is processed in accordance with the Leave of Absence Policy, including coordination with the Registrar's Office, and counts toward the maximum leave duration and time-to-degree limits established in that policy. A student seeking to return from pregnancy-related leave must submit written intent to return to the Registrar's Office and to SAS no later than sixty (60) days prior to the anticipated reentry date. Upon return, MSOM will provide reasonable support to assist the student in resuming the curriculum, which may include modified sequencing of team-based learning sessions, adjusted timelines for completion of



assessments, opportunities to fulfill missed collaborative learning requirements, or other modifications appropriate to the student's circumstances and point of reentry in the curriculum.

H. MSOM provides a clean, private lactation space that is not a bathroom, accessible to students during scheduled academic and clinical activities. Students are permitted reasonable break time for lactation, including time to express milk and travel to and from the lactation space. Lactation accommodations are generally provided for up to one (1) year following the date of childbirth. A student who requires lactation accommodations beyond one year may request a continuation by submitting updated documentation from a licensed healthcare provider to the Accommodations Officer. Students who require lactation breaks during scheduled academic or clinical activities are encouraged to submit a request to SAS in advance. Lactation accommodations apply prospectively from the date SAS receives notice of the need; MSOM is not obligated to provide retroactive modifications for absences or missed content that occurred prior to notice.

I. Faculty and staff who become aware that a student is pregnant are not required or permitted to report the student's pregnancy to institutional administration. Faculty and staff who receive a request for pregnancy-related modification must refer the student to Student Accommodation Services. Sharing a student's pregnancy status without the student's consent is a violation of this policy.

J. Pregnancy-related modifications for clinical rotations are coordinated with clinical education sites in the same manner as disability-related and religious accommodations, with particular attention to occupational health and safety requirements that may apply to pregnant students in clinical environments, including radiation exposure, infectious disease risk, and chemical exposure.

MEDICAL LEAVE OF ABSENCE

A. A student may request a voluntary medical leave of absence when a physical or mental health condition temporarily prevents the student from meeting the demands of the educational program. Medical leave under this section is governed by and must be read in conjunction with the MSOM Leave of Absence Policy, which establishes the institutional framework for all leaves, including procedural requirements, duration limits, and reentry conditions. Medical leave is a tool available to students, not a substitute for reasonable accommodations. A student will not be required to take a medical leave of absence when reasonable accommodations would enable continued participation in the program.

B. Requests for medical leave are submitted to Student Accommodation Services and must be supported by documentation from a treating healthcare provider describing the condition necessitating the leave and the anticipated duration. SAS will coordinate with the Registrar's Office to process the leave in accordance with the Leave of Absence Policy, including completion of the institutional leave of absence form. SAS will process medical leave requests promptly, and interim arrangements will be made when a student's condition requires immediate withdrawal from academic or clinical activities.

C. Consistent with the Leave of Absence Policy, medical leave may be approved for a period not to exceed twelve (12) months. Extensions beyond twelve months require approval by the Dean upon submission of updated documentation supporting the continued need for leave. Under no circumstances may a student exceed six (6) years from the original date of matriculation to complete all requirements for the D.O. degree, inclusive of all approved leaves.



D. A student on approved medical leave retains the academic status held at the time the leave began. Grades for completed coursework are not affected by the leave. If a leave is granted during an active semester, the student will be withdrawn from all current courses and assigned withdrawal grades in accordance with MSOM grading and withdrawal policies. Incomplete coursework will be addressed upon return in accordance with institutional academic policies.

E. Students on medical leave remain subject to institutional policies, including the student code of conduct. Consistent with the Leave of Absence Policy, students on medical leave may not attend classes, participate in clinical rotations, remediate coursework, sit for COMLEX or USMLE examinations, or participate in any MSOM-sponsored educational activities. Students retain access to designated student support services during the leave period. Medical leave may have significant financial aid implications, including effects on eligibility and loan repayment status. Students are strongly encouraged to consult with the Office of Financial Aid prior to requesting a medical leave. The effect of medical leave on financial aid, tuition, fees, and student housing is governed by the respective institutional policies for those areas (and/or the student housing lease) and will be communicated to the student at the time the leave is approved.

F. A student seeking to return from medical leave must submit written intent to return to the Registrar's Office and to SAS no later than sixty (60) days prior to the anticipated reentry date, consistent with the Leave of Absence Policy. The request must be accompanied by documentation from a treating healthcare provider indicating that the student is able to resume the educational program, with or without reasonable accommodations. The return documentation must address the student's current functional status and, if applicable, demonstrate resolution of the circumstances that led to the leave. MSOM will not require more extensive return documentation than is necessary to determine the student's ability to resume the program. MSOM may also require a statement of readiness to return and/or an academic success plan.

G. Upon receipt of return documentation, SAS will engage in the interactive process to determine whether accommodations are needed for reentry and will coordinate with the student and appropriate academic leadership to develop a reentry plan. The plan may address modified sequencing, adjusted timelines, repetition of previously completed coursework or rotations, phased return to clinical activities, or other supports appropriate to the student's circumstances. The Associate Dean for Student Affairs, in consultation with the Registrar's Office, will issue the final decision on return from medical leave. Approval to return is not guaranteed.

H. Return from medical leave that originated and was processed through SAS is coordinated through SAS and the Registrar's Office in accordance with the Leave of Absence Policy. A student returning from medical leave will not be required to meet substantive conditions for return that are more burdensome than those applied to students returning from other types of leave of absence, unless the additional conditions are specifically supported by the student's medical circumstances and determined through the interactive process. Students who fail to return by the end of their approved leave and who do not request an extension may be administratively withdrawn.

I. If concerns arise during or after the medical leave process regarding a student's ability to safely perform essential functions of the educational program, the matter may be referred to the Fitness for Duty process, which is governed by a separate policy. The medical leave process and the Fitness for Duty process are distinct, and a medical leave request does not automatically trigger a Fitness for Duty evaluation.



CLINICAL EDUCATION ACCOMMODATIONS

- A. Students may request accommodations for clinical rotations through the same process applicable to all accommodation requests. Requests should be submitted as early as possible prior to the start of a rotation to allow adequate time for coordination with clinical sites.
- B. SAS, in coordination with the Office of Clinical Education, may communicate approved accommodations to clinical education sites on behalf of students. Information shared with clinical sites is limited to the accommodations required and does not include the student's diagnosis, medical records, or basis for the request.
- C. Clinical education sites are independent entities that may have their own operational, safety, or regulatory requirements. MSOM will make reasonable efforts to coordinate accommodations with clinical sites, but cannot guarantee that every site will be able to implement every accommodation.
- D. If a clinical site is unable to implement an approved accommodation, MSOM will make reasonable efforts to identify an alternative clinical placement that fulfills the same educational objectives.
- E. Accommodations at clinical sites must not compromise patient safety. Determinations regarding patient safety are made in consultation with clinical faculty, site supervisors, and SAS.
- F. Students participating in surgical rotations or other clinical experiences requiring sustained physical activity, sterile environments, or specialized safety protocols should identify accommodation needs as early as possible to allow for appropriate planning and coordination.

RECORD RETENTION

Student Accommodation Services maintains documentation of accommodation requests, supporting documentation, interactive process communications, determinations, Notices of Accommodation, implementation records, and related communications in a secure, confidential system separate from academic and admissions records. Records are maintained in accordance with FERPA, HIPAA, where applicable, and institutional recordkeeping practices. Accommodation records are retained for a minimum of five (5) years following the student's last date of enrollment or last accommodation activity, whichever is later.

Access to accommodation records is limited to SAS personnel, members of the Accommodations Committee reviewing the specific student's file, and institutional officials with a legitimate educational interest as defined by FERPA. The Office of General Counsel may access records in connection with legal review or pending claims.

REVIEW CYCLE

This policy undergoes annual review or earlier revision if required by legal, regulatory, or accreditation updates. Governance approval is required for substantive revisions. The review process should include



input from Student Accommodation Services, the Office of General Counsel, and relevant academic leadership.

STUDENT CHECKLIST

Documentation for Disability Accommodation Requests

Your documentation should:

- Be written by a licensed professional qualified to diagnose the condition;
- Be verifiable (include provider name, credentials, license number, and contact information);
- Be signed and dated, and be sufficiently recent to reflect the student's current functioning;
- Describe the diagnosed condition;
- Describe current functional impact in an educational context; and
- Identify the connection between the functional limitations and the requested accommodations.

A diagnosis alone does not establish eligibility for accommodations approval.

Examples of commonly accepted documentation include:

- Psychoeducational or neuropsychological evaluations;
- Medical provider letters addressing functional limitations;
- Psychological evaluations;
- Vision or hearing specialist reports; and
- Treatment records from a licensed provider documenting an ongoing condition

Documentation that is generally insufficient alone includes:

- Old IEPs or 504 Plans without adult documentation, or without a current provider statement confirming continued functional impact;
- Self-written statements without professional corroboration;
- Provider notes without credentials; and
- History of accommodations at a prior institution without current supporting documentation.

SAS may accept a combination of documentation sources to establish eligibility. Students who have questions about whether their documentation is sufficient are encouraged to contact Student Accommodation Services before submitting a formal request.

DEFINITIONS

1. **Disability:** A physical or mental impairment that substantially limits one or more major life activities or major bodily functions. This includes individuals with an actual impairment,



individuals with a record of such impairment, and individuals regarded as having such impairment, consistent with Disabilities Act, as amended, and Section 504 of the Rehabilitation Act of 1973.

2. **Accommodation:** A reasonable adjustment that provides equitable access to educational programs and activities without fundamentally altering essential academic, clinical, or professional requirements or technical standards.
3. **Accommodation Request:** A request for reasonable adjustment or modification based on disability, pregnancy, religion, or culturally significant practice that seeks equitable access to the educational program without altering essential academic or professional requirements. Students are encouraged to submit requests through the Office of Student Affairs using the accommodation request form available on the MSOM website (preferred) or to Accommodations@MSOM.org.
4. **Religious Accommodation:** A reasonable modification to institutional policies, schedules, or practices based on a sincerely held religious belief, observance, or practice, unless such modification would fundamentally alter the educational program or impose an undue hardship on institutional operations.
5. **Culturally Based Accommodation:** A request for modification to institutional policies, schedules, or practices based on a sincerely held cultural practice or observance that is not otherwise covered under disability or religious accommodation frameworks. Culturally based requests are evaluated using the same principles applicable to religious accommodations, including good faith engagement and preservation of essential program requirements.
6. **Interactive Process:** An ongoing individualized, and collaborative dialogue between the student and institution to determine and implement effective accommodations based on functional limitations, the essential requirements of the program, and the applicable technical standards.
7. **Notice of Accommodation (NOA):** The official document identifying approved accommodations, their scope, and their approval duration. The NOA is provided to the student and to relevant faculty or administrators on a need-to-know basis without disclosing the student's diagnosis or disability.
8. **Technical Standards:** The essential cognitive, physical, behavioral, academic and professional competencies required for admission, retention, successful completion of the MSOM curriculum, graduation from MSOM, and safe medical practice, as set forth in the MSOM Technical Standards Policy, as amended from time to time. Technical standards define the threshold below which accommodations cannot reduce requirements without fundamentally altering the educational program.
9. **Student Accommodation Services (SAS):** The institutional function responsible for receiving, evaluating, and coordinating accommodation requests. SAS personnel, reporting structure, and operational procedures are designated by the institution and documented in the SAS Procedures Manual, as updated from time to time.