

Beyond Documentation: Shining a Light on Equity in Accommodation Decisions

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Welcoming *Shoreline*

- *Equitable outcomes for students*

Guiding Clarity

- Lighthouse beam reveals best path

Cutting Through Fog

- Clarify complex accommodation choices

We ask you to join us in creating a culture that reflects...

Access and Inclusion

and

Civility and Respect

...this week and in all aspects of our organization.

Today's Journey

This session is designed to build both knowledge and confidence. We'll move from conceptual framework to hands-on practice, ending with collaborative discussion.

Understanding Accommodation Decision-Making

- Why these decisions feel difficult – and why that difficulty matters

The Lighthouse Framework

- A structured equity-centered approach to complex cases

Guided Practice

- Applying the framework through structured workshop activities

- Interactive Case Studies
- Four real-world scenarios for small group discussion
- Questions and Discussion
- Open dialogue and shared takeaways

What You'll Take With You

By the end of this session, participants will have concrete tools and renewed confidence for navigating accommodation decisions, especially in complex, ambiguous cases.

- Apply an Equity-Centered Framework
- Identify and use a decision-making approach that integrates both the **medical** and **social models** of disability, centering equitable access rather than identical treatment.

Navigate Gray Areas with Confidence

- Increase your ability to reason through ethically complex cases by applying structures reflection, professional standards, and collegial discussion to reach defensible outcomes.

Why Accommodation Decisions Feel Difficult

The vast majority of majority accommodation requests follow a clear and familiar path-identifiable barriers, approach documentation, and reasonable accommodations that are straightforward to approve. Most of our work is not controversial.

And yet, disability professionals consistently report spending a **disproportionate amount of time and energy** on a small subset of highly complex cases – the ones that don't fit neatly into established categories.

“We spend 95% of our time thinking about 5% of our cases.”

- Equality vs. Equitable Access
- Equality means treating everyone the same. **Equity** means ensuring everything has what they need to access the same opportunity.
- The goal of accommodations is not identical treatment – it is equitable access. This distinction is foundational to everything that follows.

Navigating the Gray Areas

Complex accommodation decisions rarely involve a single, clear-cut answer. Instead, they sit at the intersection of competing – and sometimes conflicting – considerations that all carry real weight.

Student Needs

- The lived experience of a student's disability and how it creates real barriers to access

Documentation

- Clinical or evaluative evidence that may be recent, dated, incomplete, or from nontraditional sources

Institutional Requirements

- Policies, academic standards, and program integrity concerns that shape the boundaries of accommodations

Faculty Concerns

- Curricular expectations, fairness questions, and course-specific considerations raised by instructors

Professional Judgment

- The practitioner's expertise, training, and ethical obligation to reason carefully through uncertainty

Good Decisions Emerge from Converging Light

No single source of information is sufficient on its own. Strong, defensible accommodation decisions emerge when **student experience, documentation, and professional standards** converge through a thoughtful interactive process

Beacon One: Student Experience

- What barrier is being presented?
 - How does the disability affect access in this specific context?
 - What is the student's lived, functional experience?
-
- Strength: Provides essential context and human understanding
-
- Limitation: Cannot stand alone as the sole basis for a decision.

Beacon Two: Documentation

- What evidence supports the reported barrier?
 - What functional limitations are identified?
 - What information is still missing or needed?
-
- Strength: Provides clinical or evaluative evidence.
-
- Limitations: Cannot stand alone as the sole basis for a decision.

Beacon Three: Law, Policy, and Practice

- What does the ADA require in this situation?
 - What do institutional policies specify?
 - What do professional standards and field norms suggest?
-
- Strength: Provides legal and ethical boundaries.
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- Limitation: Cannot stand alone as the sole basis for a decision.

Documentation: Evidence in Context

Documentation provides the evidentiary foundation for accommodation decisions, but its role is to inform and support, not to automatically determine outcomes. Practitioners must evaluate what documentation tells us, what it leaves open, and what additional information may be needed.

Key Principle: Documentation is a *tool for understanding*, not a gatekeeping mechanism. Its strength lies in what it reveals about access barriers, not in whether it fits a preferred format.

- What evidence supports the reported barrier?
- Review diagnostic information, evaluative findings, and clinician observations that speak to functional impact – not just diagnosis labels.
- What functional limitations are identified?
- Focus on how the disability affects the student's ability to access the academic environment, reading speed, sustained attention, processing under stress, mobility, and so on.

- What information is still needed?
- Identify gaps – outdated evaluations, missing functional data, or documentation from nontraditional sources, and determine whether additional information is required before proceeding.
- Documentation Criteria? Different presentation. If you want to talk about what I believe is best practice, talk with me afterwards; however, that would be its own presentation, so we are moving forward.

Law, Policy, and Professional Practice

The legal and policy landscape shapes the boundaries of accommodation. It defines what institutions are required to provide, what remains discretionary, and where the outer limits of reasonable accommodation lie. This beacon provides structure and accountability.

Limitation: Law and policy define the floor and ceiling, but they rarely dictate a single correct answer within that range. Professional judgement is still required.

- ADA Requirements
- What does the Americans with Disabilities Act require in this situation?
What constitutes a reasonable accommodation versus an undue burden or fundamental alteration.
- Institutional Policy
- What do campus-level policies, academic integrity standards, and program-specific requirements specify? How do these interact with federal mandates?

- Professional Standards
- What does the broader field of disability services; AHEAD, current case law, and peer practice, suggest is appropriate, defensible, and consistent with ethical obligations?

Talk.

To.

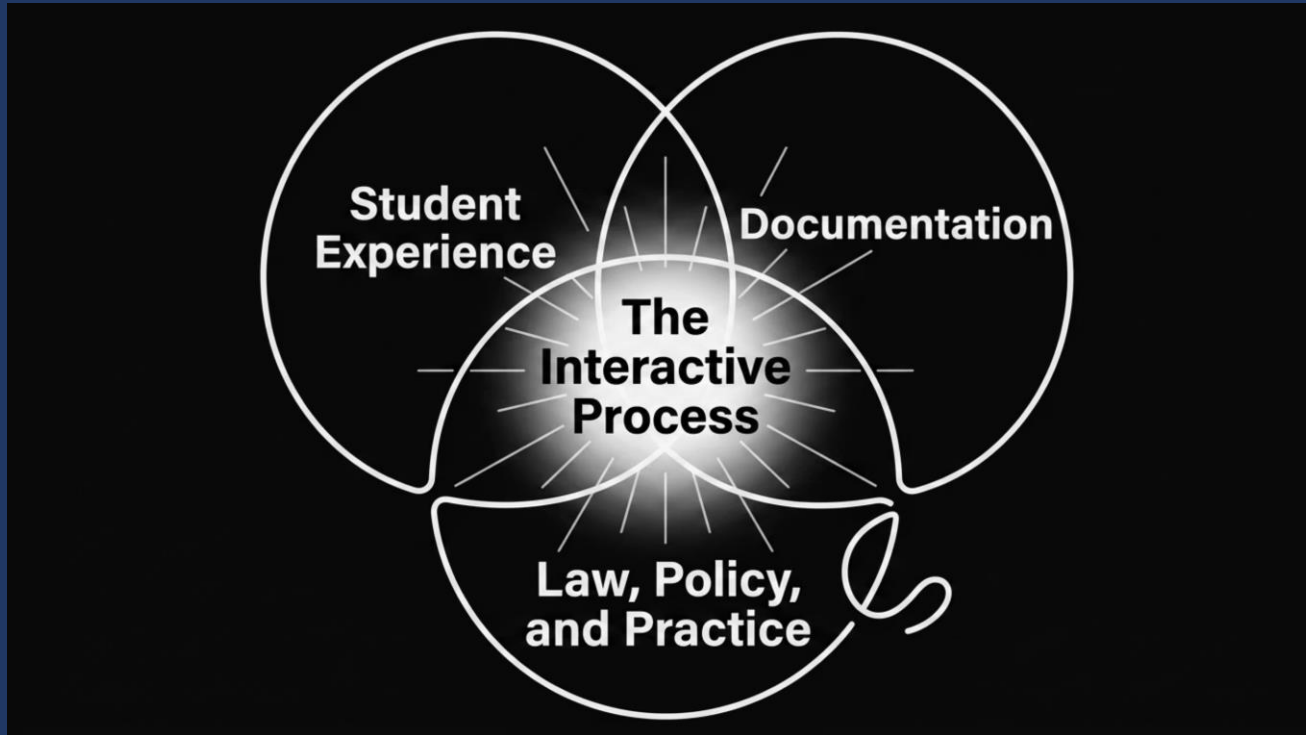
Legal.

Where the Lights Meet: The Interactive Process

The **interactive process** is not a formality; it is the core mechanism through which equitable accommodation decisions are made. It occurs at the intersection of all three beams: student experience, documentation, and law, policy, and practice.

No single beacon is sufficient on its own. When practitioners rely exclusively on documentation, they risk ignoring the student's lived reality. When they rely solely on student narrative, they risk inconsistency. When they rely only on policy, they risk rigidity. The interactive process demands that all three converge and that practitioners document how they got there.

Where the Lights Meet: The Interactive Process



The Three Decision Tests

Once the interactive process has been engaged, every accommodation decision can be evaluated against three core questions. These tests provide a consistent, legally grounded, and equity-centered framework for reaching defensible outcomes.

Test One: Barrier Removal

- Does the requested accommodation remove a **disability-related barrier** to access? Can we identify a clear, functional connection between the student's disability and the obstacle being addressed?

Test Two: Fundamental Alteration

Would granting this accommodation **fundamentally alter** the nature of the course, program, or institution? Does it change what the program is designed to assess or teach?

Test Three: Access vs. Academic Expectation

Does the accommodation provide **access to the learning environment**, or does it change the academic expectation itself? Access is the goal; altering standards is not accommodation.

Shifting Gears

Yes, and.

Clear Waters: Testing Accommodations

Before diving into complex cases, it's useful to calibrate against a clear, unambiguous example; one where all three beams of the Lighthouse Framework point in the same direction.

Basic Case Study 1

- Student presents with a diagnosis of **ADHD**, with documented functional limitations affecting sustained attention, processing speed, and performance under timed conditions.

The Analysis

- **Documentation** supports the request. The **interactive process** confirms the barrier. All three decision tests are satisfied. No fundamental alteration. No change to academic expectation.

The Request

- Extended testing time (typically 1.5×) and access to a **reduced-distraction testing environment** — both standard, widely-used academic accommodations.

The Outcome

- **Approved.** This case illustrates the baseline showing clear barriers, appropriate evidence, and reasonable accommodations working exactly as intended.

Most Cases Look Like This

Most accommodation decisions are not controversial. They involve identifiable barriers, appropriate documentation, and accommodations that clearly serve access without altering academic expectations.

Transition: This is the daily work of disability services, and it matters. But some cases require considerably more navigation. That's where we're headed next.

Before We Begin the Case Studies

1. Engage the Interactive Process

- Listen to the student's experience.
- Review documentation.
- Apply law, policy, and professional judgment.

Apply the Three Decision Tests

- **Barrier Removal:** Does this remove a disability-related barrier?
- **Fundamental Alteration:** Does this change the essential nature of the course or program?
- **Access vs. Academic Expectation:** Does this uphold academic standards?

Reach and Document the Decision

- Approve, modify, or deny the request.
- Clearly explain the rationale.
- Document how the decision was reached.

Workshop Instructions: Using the Lighthouse Framework

For each case study, work through the following structured evaluation. Apply the framework deliberately, and resist the urge to jump to an outcome before analyzing all three beams.

Step 1: Analyze Each Beam

- Consider **Student Experience** (What is the barrier?), **Documentation** (What evidence exists?), and **Law, Policy, and Practice** (What are the boundaries?)

Step 2: Applying the Three Decision Tests

- **Does it remove a barrier? Does it constitute a fundamental alteration? Does it provide access, or does it change the academic expectation?**

Step 3: Reach a Defensible Outcome

- **What decision would you make, and how would you document your reasoning in a way that reflects equity, consistency, and professional accountability?**

Veteran Documentation

A student who is a military veteran requests disability accommodations based on a service-connected disability rating from the Department of Veterans Affairs. The student does not have a traditional neuropsychological or medical evaluation, only VA documentation and a personal narrative describing the functional impact in academic settings.

How does your institution's documentation policy align; or conflict, with an equity-centered approach in cases like this?

Workshop Discussion Prompt

- Using the Lighthouse Framework, evaluate what each beam tells you about this case. Consider what the VA documentation does and does not establish. Discuss how you would engage the interactive process.

Key Question

- What information is sufficient to begin the interactive process?
- Is a VA disability rating, combined with a student narrative, enough to identify a functional barrier even without a traditional clinical evaluation? What are the risks of requiring more documentation before engaging?

Meal Plan Waiver

A student with a documented gastrointestinal condition, food allergies, or disordered eating history requests a waiver from the institution's mandatory meal plan requirement. The student argues that the available dining options do not meet their medical dietary needs, creating a disability-related barrier.

At what point does a dietary accommodation become a modification to institutional housing policy, and how does that distinction affect your analysis?

Workshop Discussion Prompt

- Evaluate the request through all three beams. What does documentation tell you? What does institutional policy say about mandatory meal plans? Where does the interactive process need to go from here?

Key Question

- What evidence establishes a nexus between the disability and the requested accommodation?
- What functional connection must be demonstrated between the student's medical condition and the barrier posed by the current meal plan? What information would you need to make a defensible decision?

Deadline Flexibility

A student with a documented mental health condition such as major depressive disorder or an anxiety disorder requests flexibility with assignment deadlines, citing disability-related episodes that periodically prevent them from completing work on time. The student has existing accommodations for testing but is requesting an expansion of accommodations to include coursework.

Consider: how would your decision differ if the course is sequential, project-based, or involves clinical or lab components with strict deadlines tied to external requirements?

Workshop Discussion Prompt

- Apply the three decision tests. Does deadline flexibility remove a disability-related barrier, or does it fundamentally change how academic performance is assessed? How does episodic disability affect your analysis?

Key Question

- Does the requested accommodation remove the barrier, or simply extend the timeline?
- Is there a meaningful distinction between removing a disability-related barrier to submitting work and providing an ongoing workaround for a recurring functional limitation? How does that distinction shape the accommodation?

Finish From Home

A student with a documented physical disability or chronic health condition requests permission to complete the remaining weeks of a semester from home — attending class remotely and submitting work electronically — after a disability-related health event makes extended on-campus presence difficult.

This case often surfaces tensions between disability services and academic affairs. Document your reasoning carefully — and consider when faculty or department consultation is appropriate.

Workshop Discussion Prompt

- This case sits at the intersection of access and academic integrity. Work through all three beams and all three decision tests. Consider the nature of the course, the timing, and the student's prior performance.

Key Question

- Would granting the request remove a barrier, or fundamentally alter the course?
- Does remote completion preserve the academic experience, or does it change what the course is designed to assess? How does the answer differ across course types: lecture, lab, clinical, flight, or studio?

Emerging Themes Across the Cases

As we debrief the case studies, several consistent themes emerge. Themes that surface in complex accommodation decisions across institutions, disciplines, and student populations.

Student Narratives Matter

- The student's lived experience provides context that documentation cannot capture, and it is a legitimate part of the interactive process*

Documentation Matters

- Evidence grounds decisions in defensible, functional analysis, but documentation alone is never sufficient to approve or deny*

Policy Matters

- Legal obligations and institutional policy define the structure within which professional judgment operates, they are not obstacles, they are guardrails

Professional Judgment Matters

- In complex cases, no framework eliminates the need for thoughtful, trained, ethically grounded human judgment

Rarely Does One Source Provide the Answer

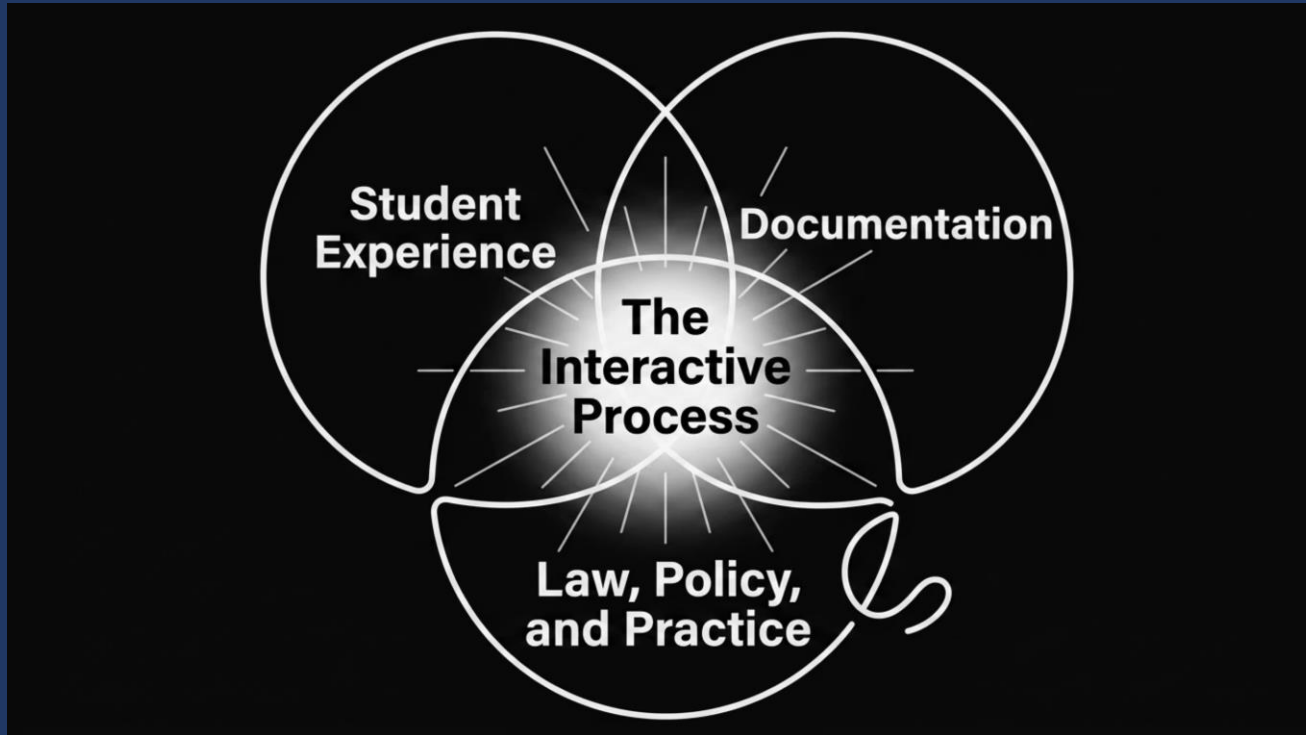
- Equitable decisions emerge from convergence, when all three beams illuminate the same path through the interactive process

Returning to the Lighthouse

We return to where we began because the framework is not just a tool for workshops. It is a model for how disability services professionals can approach every complex case with consistency, equity, and accountability.

Good accommodation decisions are rarely illuminated by a single source of information. They emerge when student experience, documentation, and professional standards converge through the interactive process in pursuit of equitable access.

Where the Lights Meet: The Interactive Process



Questions and Discussion

How would you navigate the interactive process in your own practice? What cases challenge you most and how might the Lighthouse Framework help?

Our responsibility is not to eliminate uncertainty. Our responsibility is to **navigate** it in pursuit of **equitable access**.

Key Takeaway

- Every student deserves a practitioner who will bring all three beams to bear with care, consistency, and a genuine commitment to equitable access.

Stay Connected

- Continue the conversation with colleagues. Complex cases are best navigated together through consultation, peer review, and shared professional standards.
- Ray Anderson, MBA, MA
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- Embry-Riddle Aeronautical University
- Prescott Campus

Session Evaluation

tiny.cc/8zu1101

Thank you for attending!

Your feedback helps shape future programming.

