

Fast Track and Partial Approvals: Streamlining the Interactive Process

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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.



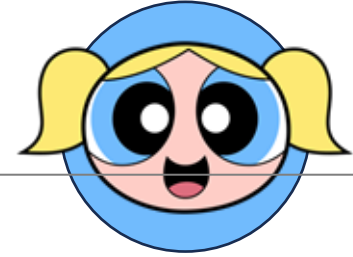
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- Undergrad & grad roles: McDaniel College, Cornell University, SUNY Broome
- M.A. Student Affairs Administration, Binghamton University
- Disability Specialist, Georgetown University
- Accessibility Coordinator, Marymount University



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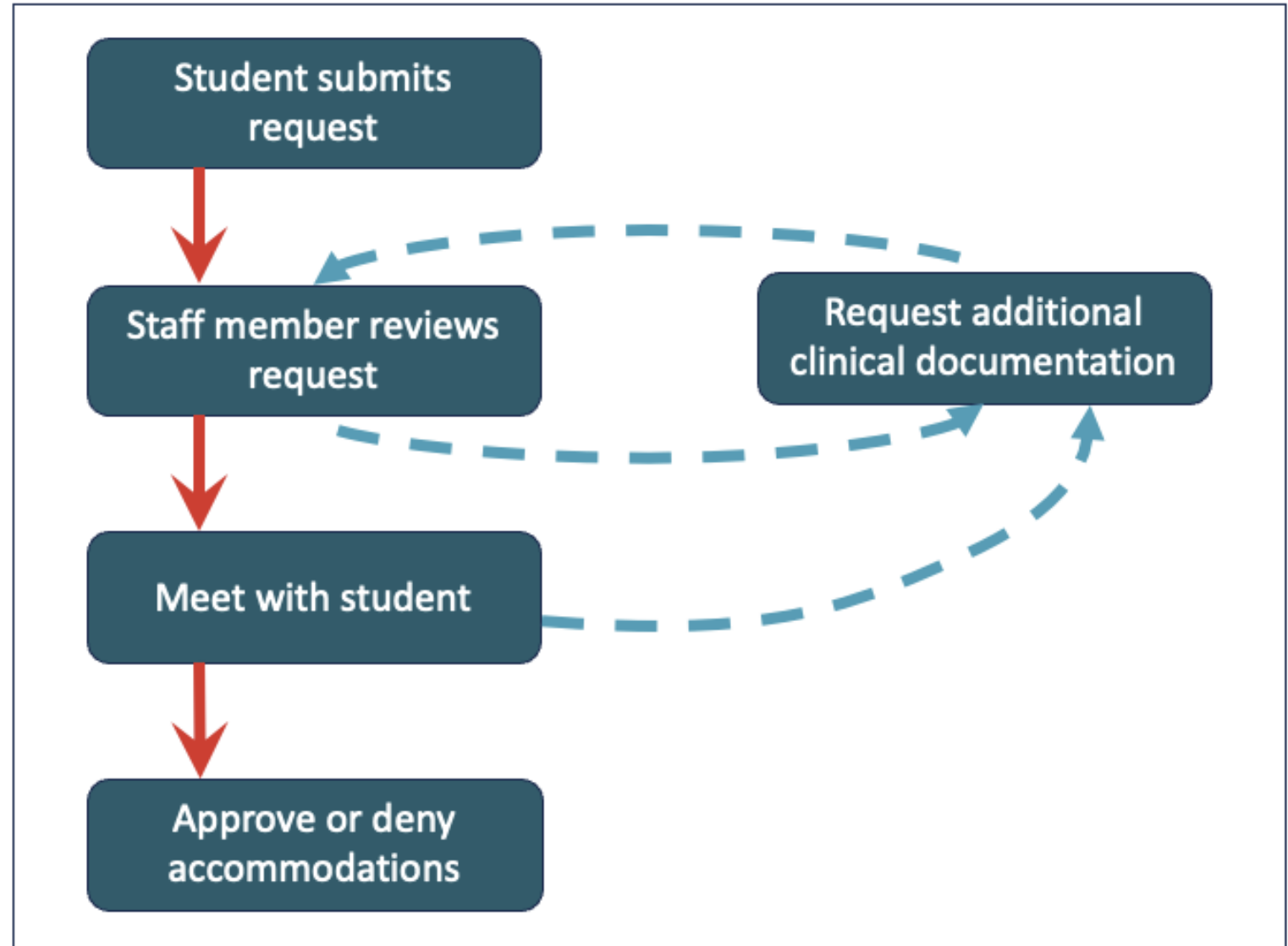
- M.Ed Learning and Design, Vanderbilt University
- DSO Student Assistant, OSU and Vanderbilt
- Fulbright Scholar, Timor-Leste
- Disability Specialist, Georgetown University
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- Former K-12 language educator; Teacher of the Year & Innovation Fellow
- Accessibility Coordinator, Georgetown University
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Look familiar?



The Problem

Students are not being accommodated quickly enough

- Struggling to stay under 4 weeks to review accommodation requests
- After review, students often couldn't get in to schedule a meeting with us for 2-3 weeks out

Contributing Factors

New and competing priorities and inability to prioritize

- Number, complexity, and types of requests increased (housing, dining, and academic)
- Turnover/new advisor roles added
- Gaps in office functions requiring significant assistance and time from the advisors

The Reality

The original model could not keep up with new demands.

We were unable to change the factors contributing to the problem...

But we could change our process to reduce wait times for accommodations while fulfilling competing office needs.

What is the “Interactive Process”



inter
“between”



agere
“to do, discuss”

Interactive

Legal Context

- Not discussed in Title II or III of the ADA or Section 504, discussed in ADA regulations **only** in the employment context
- Case law has further defined the process as getting the “input of the employee as well as the employer”
 - This holds true for the education context

What is “Input”

- Receiving input from students and the university (DSO, faculty, etc.) can be done via:
 - A meeting (in-person/virtual)
 - Email communication
 - The written information/self report a student provides in their accommodation request

A meeting or oral conversation is **not**
explicitly stated as a legal requirement.

By requiring a meeting for **all** students as part of the interactive process, it **can** inadvertently create a burdensome process if a meeting is not required to gain information to understand the access needs and if it would significantly interfere with an office's ability to provide accommodations in a timely manner.

How does this relate to
access fatigue?

Interacting with CARE

- **Create** a non-burdensome process
- **Allocate** resources to students equitably
- **Reduce** access fatigue
- **Ensure** meetings do not create additional barriers
 - Waiting for a meeting can be withholding access
 - Schedule meetings with purpose

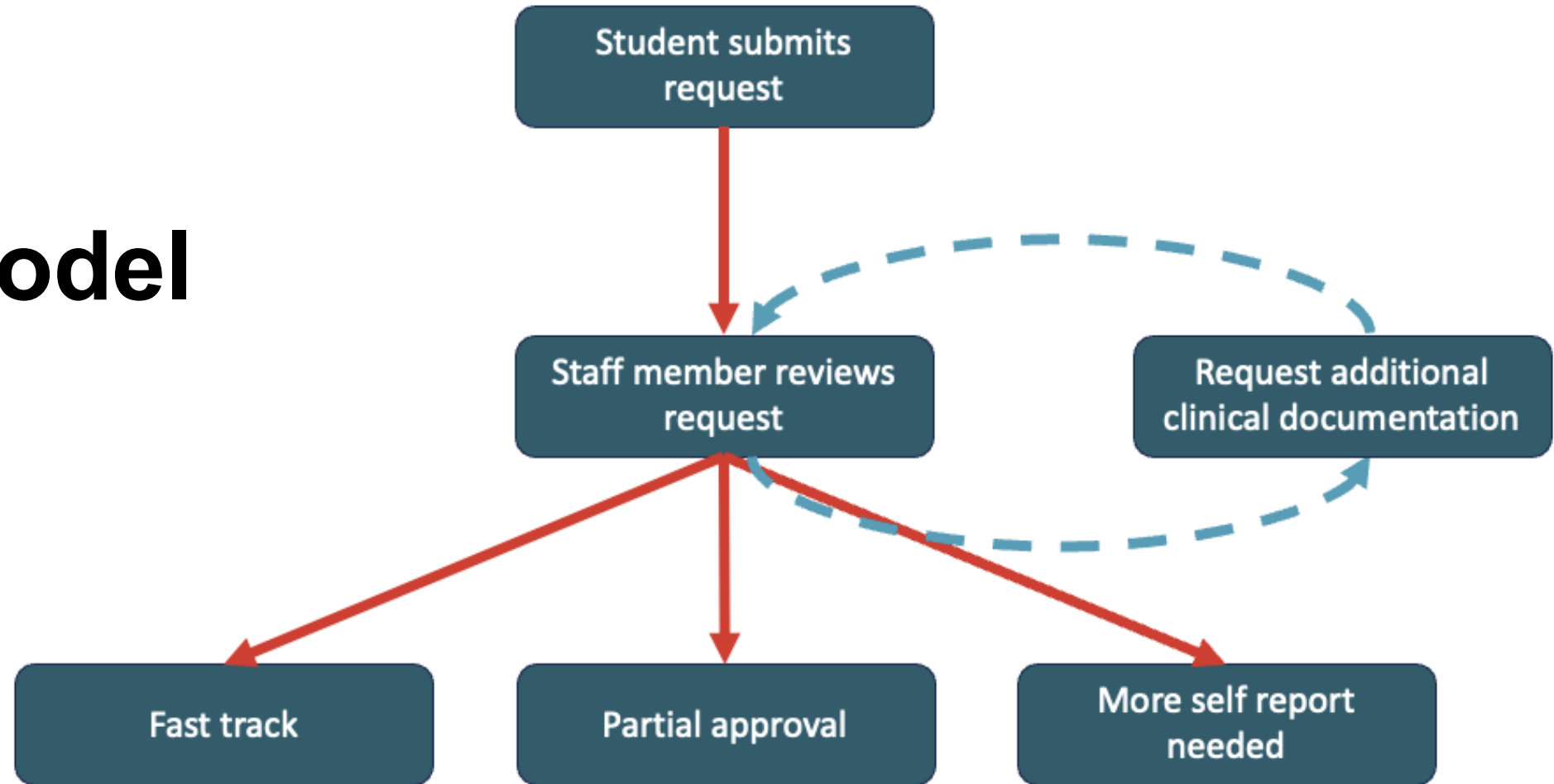
Checkpoint

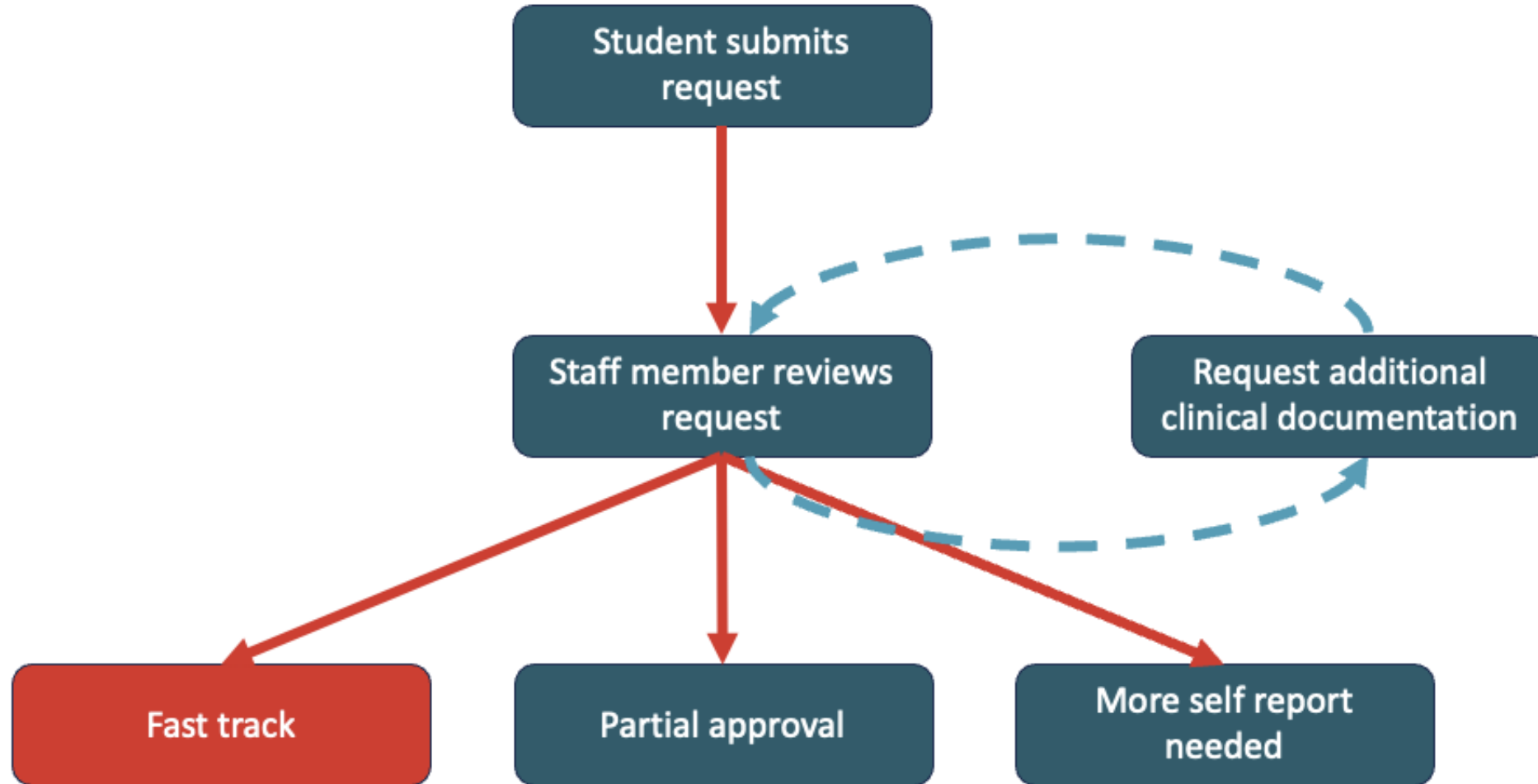
When is it okay to **not** meet with students?

Think to yourself: What is the purpose of having a meeting?

- Gathering additional information or clarifying?
- Explaining policies and procedures?
- Establishing rapport with the student?

New Model





Fast Track

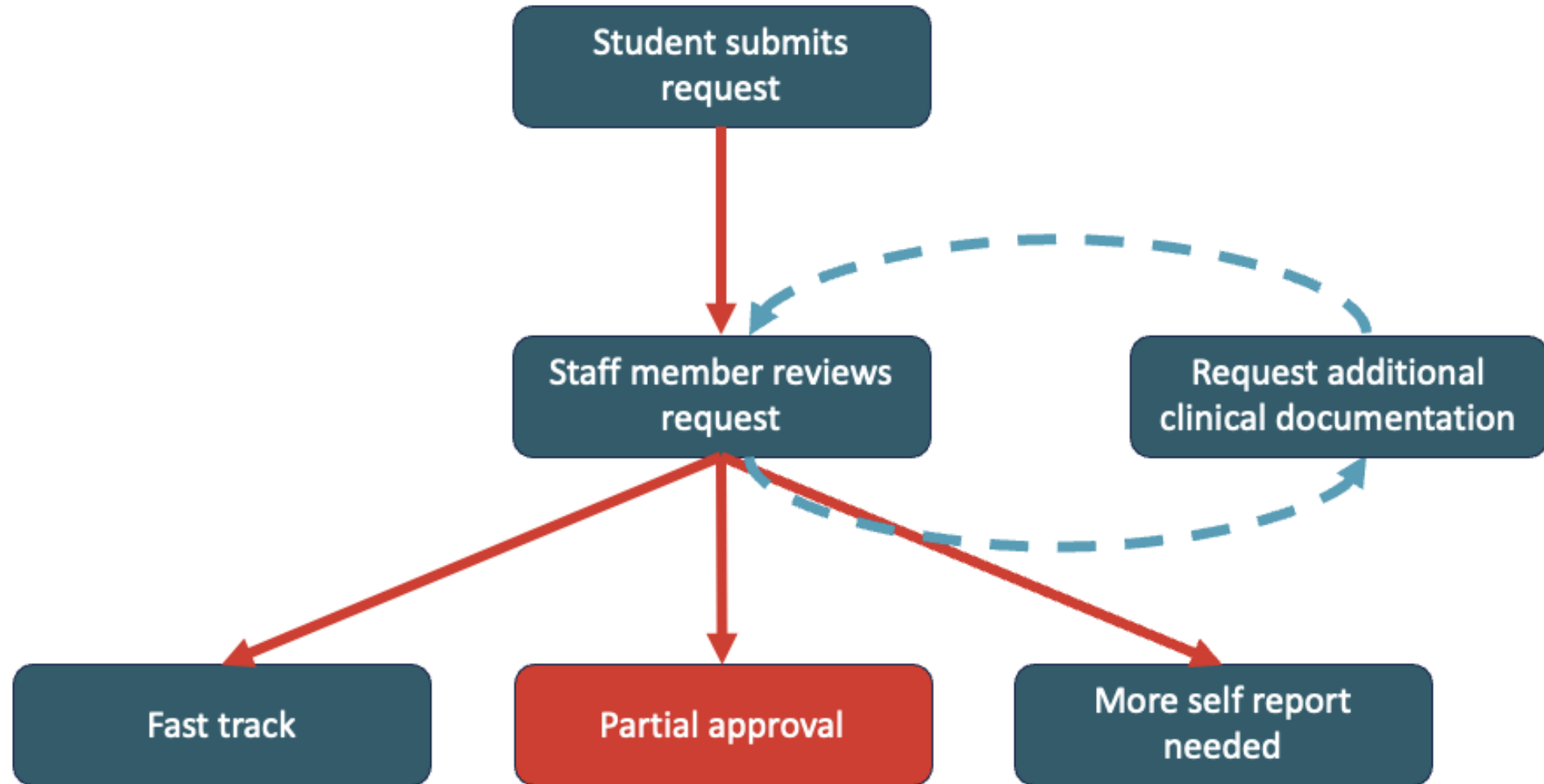
Approving all requested accommodations without meeting with the student

- Strong documentation that clearly supports request, access need is clear and easily addressed by the requested accommodation
- If a meeting would solely be used for explaining policies/procedures that could be provided in writing

Fast Track Continued...

- There may be some accommodations your office will determine are not eligible for fast track

***Follow up sent to student still provides option for student to schedule a meeting if they choose



Partial Approval

Partial “fast track” Approval

- Approving some of the requested accommodations without a meeting, but not (yet?) approving others
- More information is needed to determine some requests

Partial Approval Continued...

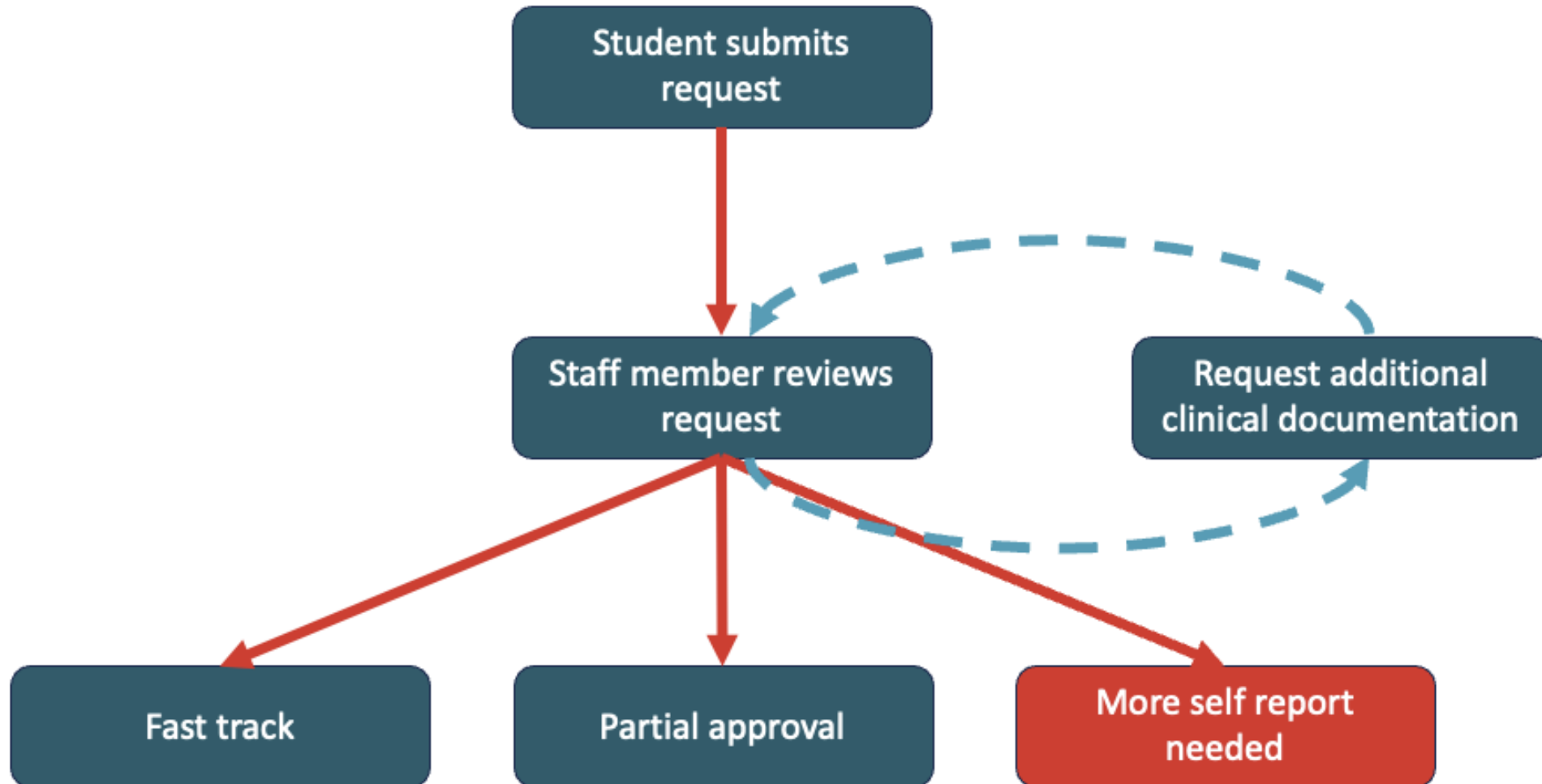
What information is still needed?

- More clinical documentation?
- More self report?
 - Can it be asked via email?
 - Or does it necessitate a meeting?

Benefits of Partial Approvals

- Allows student to receive some accommodations as your office reviews their other (typically more complicated) requests

Bonus: creates a paper trail for appeals/grievances



More Self Report Needed

- Email communication
- A meeting (in-person or virtual)
- A phone call

Personal Reflections

**What was your initial
reaction to the idea of
changing to this model?**

How did you get on board?

What were the pain points you noticed or experienced?

What were the positive outcomes?

**What were some areas
or possibilities for bias?**

What exists outside of this model?

Checkpoint 2

How might this model work in your department?

Think Pair Share

- What has you on board? What is holding you back?
- What do you anticipate being the pain points?
- What positive outcomes are you hoping for?
- What biases exist in your office?
- What exists outside the model for your institution?

What Questions Do You Have?

Answer: It depends



Citations

- *Loulseged v. Akzo Nobel Inc.*, 178 F.3d 731, 735 (5th Cir. 1999).
- *Pickett v. Texas Tech Health Sciences Center*, No. 21-11087, 2022 U.S. App. LEXIS 16564, 5th Cir. (June 15, 2022)