



REASONABLE ACCOMMODATION OF DISABILITIES (FOR STUDENTS)
EFFECTIVE DATE: APRIL 28, 2020

The School will adhere to the requirements of Title III of the Americans with Disabilities Act¹ and applicable² requirements of Section 504 of the Rehabilitation Act³, and all other applicable laws preventing discrimination against individuals with disabilities. These laws prohibit discrimination against individuals with disabilities in public accommodations, as well as the exclusion of qualified individuals with disabilities from participation and/or the benefits of any School program or activity solely by reason of the individual's disability. As part of this policy, applicants and students (hereinafter "student") with disabilities, or their parents/guardians (hereinafter "parents"), may request reasonable accommodations that would permit the student full and equal access to the goods, services and operations of the School, which include both physical and programmatic (academic services) access and school-sponsored activities, such as field trips.

Request for Accommodation

Parents of a student with a disability who want to request a reasonable accommodation in order for the student to access the goods, services or operations of the School, shall make a request in writing to the Lower School Director, Faiza Seedat, Middle School Director, Nahid Ansari, and/or Head of School, Amira Al-Sarraf

The request must identify: a) the benefits, goods, services, or operations to which the student requests full and equal access; and b) the desired accommodation(s) being requested. For the purposes of this policy, verbal requests for accommodation shall also be deemed requests for accommodation; however, the School may ask that verbal requests for accommodation be followed up by a request in writing.

¹ 42 U.S.C. §§ 12181 *et seq.*

² The Code of Federal Regulations include extensive regulations and procedural requirements for purposes of implementing Section 504 of the Rehabilitation Act. The Regulations applicable to Section 504 provide, however, that "[t]his part applies to each recipient of Federal financial assistance from the Department of Education and to the program or activity that receives such assistance." (34 C.F.R. § 104.2.) The Paycheck Protection Program is administered by the Small Business Association ("SBA") and not the U.S. Department of Education. As such, while the School would need to comply with Section 504 including importantly its provisions against discrimination on the basis of disability, we believe the corresponding implementing regulations at 34 C.F.R. 104.2 *et seq.*, which include various procedural requirements, do not apply to schools that receive a SBA loan, unless a school separately also receives federal funding from the U.S. Department of Education.

³ 29 U.S.C. § 794.



Notice of Need for Accommodation

Circumstances may arise that provide reasonable notice to the School that an individual student may have a disability that may require the student be provided reasonable accommodation, whether or not the School receives verbal or written request for such accommodation. In the event the School does receive such reasonable notice of a possible need for accommodation, the School will discuss with the student and the student's parents to determine whether a reasonable accommodation is being requested and/or is required.

Reasonable Documentation of Disability

Upon receipt of a written or verbal request for accommodation, or pursuant to any conversation regarding whether a reasonable accommodation is being requested and/or is required, the School may require such additional information as reasonably necessary to establish the nature and extent of the disability in question and the accommodation(s) being requested for that disability.

Case-by-Case Determination

The School will address each case involving disability accommodation issues on a case-by-case basis. The nature and extent of the reasonable accommodations provided by the School to the student, if any, shall be made in accordance with all applicable laws prohibiting discrimination on the basis of disability. Subject to those laws, the School reserves the right, in its sole discretion, to determine what reasonable accommodations, if any, to provide to a student in a given case. The School will inform the student and the student's parents in writing of its decision as to reasonable accommodation(s). The School will not provide accommodation(s) that would pose an undue burden upon its finances or operations, or that would endanger the health or safety of the student or others, or that would fundamentally alter the nature of the School or its goods, services or operations.

Please direct any questions concerning this policy to the Human Resources Department of Business Office.