

Oregon State University

Affiliate Housing Program – Chapter Accessibility Planning

Introduction

The ADA requires that public entities ensure they are accessible to people with disabilities. This means providing equal access to all programs, services, and activities of Oregon State University.

The Affiliate Housing Program creates a university connection to these living groups (chapters) through the requirements that the chapters meet certain objectives in alliance with the First-Year Experience Initiative. These chapters consist of non-profit cooperative living groups, including but not limited to OSU fraternities and sororities.

Prior to joining the affiliate housing program, the chapters were not expected to meet the same ADA standards as the university. Chapter participation in the affiliate housing program connects them to a university program – a program that must meet equal access obligations. This is an important distinction. Program accessibility can be accomplished by any number of methods, though in some cases physical modifications will be required. Entities such as OSU are not required to remove all physical barriers that exist, as long as we can ensure that our programs are accessible. Physical modifications are therefore only required when there is no other reasonable way to make the program accessible. When physical modifications are undertaken, they must meet current standards.

In summary, there are four essential points when it comes to the accessibility of university programs:

1. Programs must be accessible
2. Facilities don't necessarily need to be fully accessible
3. In some buildings, physical modifications will be needed to make programs accessible
4. When modifications (renovations) are made, they must meet ADA and State of Oregon codes

In an effort to be as thorough as possible, OSU has outlined how chapters must go about providing access to their programs. We remain open to exploring other options that lead to the necessary outcome – university programs that are accessible.

Chapters need to meet the requirements in this document only if they are part of the affiliate housing program, and wish to remain so. We want to acknowledge that not continuing as an affiliate is an outcome chapters may wish to explore. Regardless of affiliation, we encourage all chapters to work towards inclusion.

Accessibility Planning

Each chapter must complete a plan in order to ensure that the chapter programs, services and activities are accessible. The plan in this context should have four components.

1. **Evaluation:** An evaluation of accessibility to the chapters programs, services, and activities for people with disabilities, including physical accessibility of the building(s), policies, procedures, etc.,
2. **Barrier Removal:** A plan for removal of the discovered barriers (as defined in Barrier Removal) to ensure program access,
3. **Accommodations:** Established processes for providing reasonable accommodations, and
4. **Monitoring:**
 - a. Continued conversations and openness to change as the legal landscape changes, and
 - b. Monitoring the impact of changes to the program that may necessitate further barrier removal.

Each chapter must complete each of these steps in the planning process. How those steps are completed will need to be a discussion between OSU and the chapters, however, it has already been agreed that each chapter will have three years from the time the chapter joined the program to create a plan. The completed plan must have reasonable timelines for expeditiously addressing the barriers to the recruitment process as defined in Evaluating Essential Program Elements and Barrier Removal. OSU expects periodic reports on the status of the planning process and barrier removal. Some of our thoughts on directions the chapters should take are discussed next.

Evaluation

Evaluations will need to be completed. For a fraternity chapter, this likely means evaluations of:

1. Essential Program Elements, and
2. Policies and Procedures

Evaluating Essential Program Elements

An assessment must evaluate accessibility of all essential elements of programming, such as, but not limited to:

- Recruitment
- Pledging
- Living
- Participation in daily living (preparing food, eating, etc.)
- Social activities
- Meetings

OSU will assist with providing a walkthrough to identify obvious physical facility barriers and elements in further need of assessment. Since many of these program elements are dependent on physical facility accessibility, it is important to identify physical areas that at a minimum should be addressed through barrier removal.

Evaluating Policies and Procedures

OSU will assist with providing an assessment of all policies, procedures, bylaws, etc. to ensure that they are non-discriminatory. Sometimes, policies that appear neutral can have unintended effects, OSU will help the chapters identify those instances so that the chapters can work to revise. The

chapters will need to provide access to all documents, formal, informal, or otherwise, for a joint review. It may be useful to convene a small team to collectively review.

Barrier Removal

Once an evaluation has been completed, a decision will have to be made as to which physical barriers need to be remedied expeditiously, versus which physical barriers may be able to be removed on an as needed basis through an accommodation process. All policies and procedures where barriers have been identified need to be revised to be inclusive.

While we want to acknowledge that having a chapter that is as proactively accessible as possible is the best step each house could take to invite and welcome members with disabilities, we understand the difficulties this would place on each chapter. In an attempt to provide an environment that is as integrated as possible, while acknowledging this limitation, we've outlined different levels of physical barrier removal required depending on the status of a potential member.

1. **Recruitment.** The member recruitment process must be accessible proactively, so at a minimum, potential members with disabilities (specifically wheelchair users) must be able to access the houses and a restroom in each house. This means that at least one entrance into each house must be accessible (no stairs or a ramp where stairs exist), and one restroom on the main floor. Chapters must also offer potential members information on who to contact to seek accommodations during this process.
2. **Associate Membership/Pledging.** Depending on the system of each chapter, the pledge process must also be fully accessible – though provisional accommodations can be provided for access to elements that may need to be renovated (such as living quarters, or access to physical spaces that pledges use). During this time period – between recruitment and full membership, chapters will need to work with pledges with disabilities and OSU to identify needed renovations, and will need to plan to have the work completed by the time the pledge becomes a full member living in the house. Having the evaluation completed beforehand will help ensure that renovations can happen in a timelier manner since obvious physical barriers will already be known.
3. **Full Membership.** Full members with disabilities must be provided access to the most integrated living environment, in the same time frame as non-disabled members.

No complete list can be provided in this document on features that may be required to be physically modified during the pledging process, as it is likely a case-by-case determination. However, it is safe to consider certain physical features as necessary to be accessible for full members: parking (if also provided for non-disabled members), one entrance, social spaces, meeting rooms, kitchen, dining, at least one restroom, and at least one sleeping room/living quarter. Integration means that, while a chapter may only need one accessible sleeping room for a member, that member cannot be segregated from the rest of the house. While the goal, and the most inclusive outcome, would be for all rooms to be accessible, one acceptable option could be to provide multiple sleeping rooms clustered together – so that students with disabilities have at least a comparable experience, as close as possible to that of non-disabled members.

The chapters will be expected to work with OSU staff to review any renovation plans. It is much more efficient to find and address issues in planning than after they are built.

In the next section we will lay out potential steps each chapter may need to take based on the disability of the potential member.

Accommodations

Chapters will also need to arrange for processes to ensure students with disabilities have an avenue for requesting accommodations during all stages of membership. Chapters must have someone designated as the point person for coordinating requests for reasonable accommodations and working as a liaison with Disability Access Services (DAS). The point person will assume responsibility for arranging reasonable modifications of the chapter's operations, at the chapter's expense, to enable otherwise qualified individuals to participate fully in its programs, services, and activities in the most integrated setting possible.

This information should be documented in the Accessibility Plan for each chapter.

While it is not possible to give a complete list of all accommodations that may need to be provided, as it is always case-by-case, examples of some possible accommodations are:

- sign language interpreters for events,
- alternative formats for important documents/materials,
- wheelchair accessible rooms,
- accessible rooms with communication features (strobe alarms, doorbells, etc.)
- single rooms,
- dining plan exemptions/modifications,
- allowing service and assistance animals, and
- physical modifications.

As mentioned in the barrier removal section, the physical environment of the recruitment process should be proactively accessible for wheelchair users, thus providing some level of access for others with mobility disabilities as well. There may also need to be modifications for any member who is deaf, blind, or who has an invisible disability. Disability Access Services will assist with all of those potential needs. Chapters will just need to ensure that the student is connected to DAS.

Monitoring

As the legal landscape changes, modifications may need to be made to programs of the university. Each chapter must remain open to shifting policies and procedures as this happens. OSU stays fully informed of these changes, and will engage with the chapters if any changes affect the program.

Additionally, programs change over time, so chapters and OSU will need to jointly monitor the impact of changes to the programs that may necessitate further barrier removal. An example of this may be bylaw changes for a chapter – we would need to jointly ensure that those changes do not negatively affect people with disabilities.