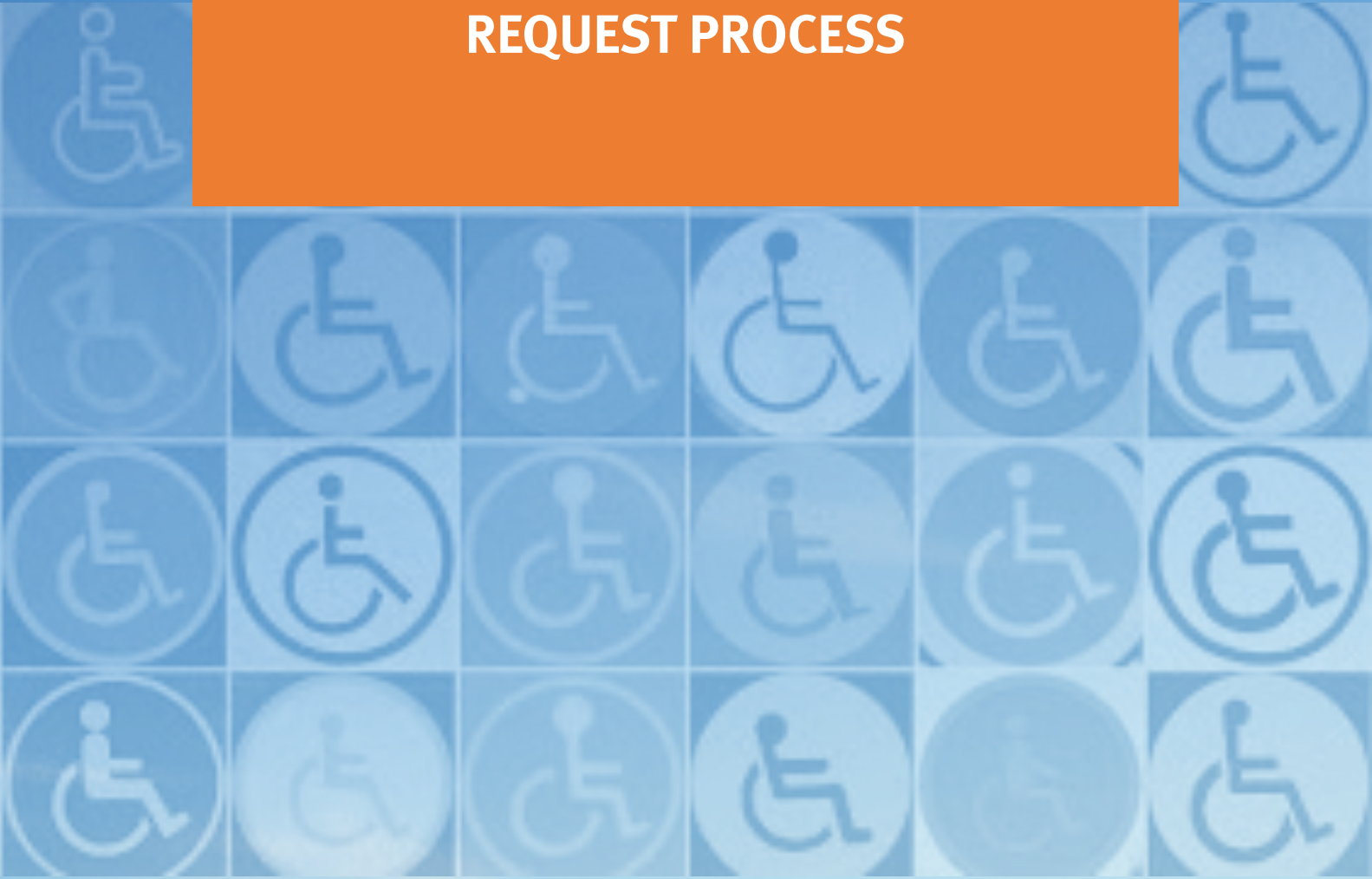


ADA ACCOMMODATION REQUEST PROCESS



ADA Accommodation Request Process Through the Center For Disability Services for Enrolled Students

Kaplan University is committed to providing opportunities for higher education to students with disabilities and to making the online programs, activities, and facilities at the University accessible to students with disabilities. All accommodations for students with disabilities are handled via the Center for Disability Services (CDS), a division of the Academic Success Center (ASC).

To benefit from the protection of the Americans With Disabilities Act (ADA) and Section 504 of the Rehabilitation Act, it is the student's responsibility to self-disclose a disability to the CDS and request an accommodation. Kaplan University requires the student to provide supporting documentation, which must verify the existence of the disability and the subsequent need for an accommodation.

Kaplan University has an obligation to maintain confidentiality regarding a student's disability. Any information collected is strictly utilized for the benefit of the student. Disability-related information is collected and maintained separately from the student's University record and housed within secure files with access limited to staff members of the CDS.

If a student determines the need for an accommodation, the student must submit an Accommodation Request Form and supporting documentation to Kaplan University's CDS. An accommodation cannot be provided until the student's disability has been verified by a qualified medical professional or other appropriate health care professional. Once the required documentation is submitted to the CDS, the manager of the CDS reviews the file and communicates with the student and respective instructors accordingly.

Because the CDS balances the rights and responsibilities of students and those of Kaplan University, reasonable accommodations will not lower the academic standards of a course nor alter essential degree requirements. Instead, the accommodations will give Kaplan University students better opportunities to demonstrate their academic capabilities. Examples of reasonable accommodations provided are: extended time for assignments



and assessments; textbooks in alternate format; assistive technology (i.e., Dragon Naturally Speaking, ClaroRead, Zoomtext); closed captioning for online audio seminars; and Interpreters for ground-based classes. Please note this is not an exhaustive list and each accommodation request is reviewed on a case-by-case basis.

Accommodations are not retroactive and will remain in effect until the student is no longer an active enrollee at Kaplan University. In-class extended time accommodation deadlines are for each respective week and cannot be accumulated and added into other units. A letter outlining approved in-class accommodations, such as extended time, is drafted and issued through email to each respective instructor(s) upon approval (if a term is currently in session) and on the first day of every new term. Students are always blind-copied on their letter of accommodation, should they desire a copy for their personal records.

In addition to online student accommodations, Kaplan University ground facilities are compliant with code. The name, address, and telephone number of the Disabilities Coordinator for each campus are posted on the University website at <http://www.kaplanuniversity.edu/academic-support/disability-services-center.aspx>, are posted in the Admissions Office, and can be obtained from the Campus President/Executive Director.

Information regarding Kaplan University's accommodation process can be located on the external Kaplan University marketing site: <http://www.kaplanuniversity.edu/academic-support/disability-services-center.aspx>. Students also have access to this information through their online student home page (KU Campus).

Public Accommodations for Public-Facing Content and Facilities

Kaplan University is consistently working to improve the accessibility of its public-facing website and its publicly available content. Title III of the ADA requires that no individual be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, etc. of any place of public accommodation by any private entity providing or owning those goods, services, facilities, etc. In other words, the law provides that a no entity shall deny an individual the opportunity to participate in any publicly available goods or services on the basis of that person's disability. For Kaplan University,



as for most institutions, this law impacts the delivery of its external “marketing” website and any publicly consumable content such as videos or articles it chooses to share openly. Although there is some debate on the application of the “public accommodation” requirement to public web content, in February 2015 the Department of Justice (DOJ) issued its Proposed Final Rule for the accessibility of websites for federal contractors and for state and local governments. With this, the DOJ finally announced that it had chosen a standard — Web Content Accessibility Guidelines 2.0, Level AA (“WCAG 2.0 AA”) — by which it was proposing that websites should be governed. The DOJ indicated that it would engage in rulemaking to address the applicability to private nonfederal contracting entities but that rulemaking has been repeatedly delayed.

Regardless, a number of private and government actions have challenged the accessibility of higher education institutions’ public web content. Kaplan previously engaged RISE as a contractor to update the University’s main public marketing website. Although we feel that our websites meet the public accommodation requirements as the law currently requires (in particular accessibility of video and legal/privacy notice content), as part of the website renovation, at the direction of the legal team we evaluated the website’s compliance with the proposed WCAG 2.0 AA standards by engaging both internal and external experts. We found that, like most public websites in and out of the education sector, some of the website content needed to be addressed to continue to bring the entire site into compliance with the proposed standards. Due to new technologies and dynamic and changing content, complete compliance with these WCAG standards is a moving, and difficult, target to hit. However, Kaplan tasked RISE with addressing and implementing the WCAG requirements as they updated the site. This is an iterative and ongoing process that we estimate will take 18 months through a series of updates to review and update all areas. Additionally, at the direction of the legal team, Kaplan is in the process of engaging a vendor to provide additional ADA training and website assessment so that we can further ensure all of our public-facing content is accessible and we can identify any additional areas where improvements can be made.