



Commission on Education Technical Standards Template Ad Hoc Group

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Tuesday, April 1, 2025



Background

- Oct 2, 2024 ALC Presentation on Technical Standards and Disability Accommodations
- Idea to create a resource/guide for programs was generated



**Technical Standards and
Disability
Accommodations**

Academic Leadership Council's Meeting
October 2, 2024

Background

- Programs are currently inconsistent with Technical Standards
- Desire to formulate Tech Standards that are easily read and understood
- Create ease and efficiency for new programs and those who wish to update
- Limit confusion surrounding terms

COE Ad Hoc Committee

- *This is an initiative of the COE.*
- Goals is to create a workgroup to develop a guide for programs to use *if they choose*
- *These will be optional guides. Nothing has been created yet.*

Origin of Technical Standards

Section 504 of the Rehabilitation Act of 1973
“..... prohibits discrimination on the basis of disability in any program or activity receiving Federal financial assistance.”

<https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-84>

Definition

Technical standards “refers to all non-academic admissions criteria that are essential to participation in the program in question.”

Section 504 of the Rehabilitation Act of 1973 Federal Guidance, 45 C.F.R. pt. 84, App. A, p. 405 (1978).

Note: This is DIFFERENT from Essential Functions*

Under Section 504 and the ADA, "essential functions" are the fundamental, **crucial job duties an employee must be able to perform**, with or without reasonable accommodation, to be considered qualified for a position.

*These may be used by fieldwork site, but not by the university in place of technical standards

Purpose



Used both for students with disabilities and for non-disabled students;

Non-academic criteria essential for the student to participate in the program;

Include the attitudes, experiences, and physical requirements the student must possess in order to learn and perform the essential requirements of the program, and

Helps students with disabilities determine prior to admission if they have the technical skills needed to complete the program and whether they will need to seek accommodations.

**"73% of medical schools used
discriminatory language in their technical
standards, and only 13% included mention of
accommodating students with disabilities."
(Stauffer et al., 2022)**

Stauffer, C., Case, B., Moreland, C. J., & Meeks, L. M. (2022). Technical Standards from Newly Established Medical Schools: A Review of Disability Inclusive Practices. *Journal of Medical Education and Curricular Development*, 9. <https://doi.org/10.1177/23821205211072763>

Organic Technical Standards **versus** Functional Technical Standards

Requires the student to be **able to demonstrate certain physical, cognitive, behavioral, and sensory abilities** without assistance and emphasizes how a student goes about completing a task, over the skill- based competency.

Communication: A candidate should be **able to speak**, to **hear**, and to **observe** patients in order to elicit information, describe changes in mood, activity, and posture, and perceive nonverbal communications. A candidate must be able to communicate effectively and sensitively with patients.

Focus on skilled based **competencies**, with or without the use of accommodations or assistive technologies.

Communication: Students should be **able to communicate** with patients in order to elicit information, to **detect** changes in mood and activity, and to establish a therapeutic relationship. Students should be able to communicate effectively and sensitively with patients and all members of the healthcare team.

Requirements

There is NO federal **regulatory** requirement to have Technical Standards


Some **accreditors** require Technical Standards (e.g. Medicine) but ACOTE® does NOT.

Some **professional associations** publish Technical Standards (e.g. American College of Radiology) but AOTA does NOT.


Legal Implications

Section 504 requires that no “**otherwise qualified**” person with a disability be excluded from participation in any program that receives federal funds.

Students must be able to meet both the academic and technical requirements of the program to be considered “otherwise qualified.”



However, technical standards must not serve as an arbitrary barrier to students with disabilities.



Accommodations should be readily accessible, so that students with disabilities have the optimal chance to meet the standards.

“Technical standards that are available may utilize language that communicates a legalistic approach to working with students with disabilities. **In many technical standards, the communication is very clear and suggestive that students with disabilities are not welcome.**” (M. M. McKee et al, 2020 p195)

L. M. Meeks, L. Neal-Boylan (eds.), Disability as Diversity, Springer Nature Switzerland AG 2020 https://doi.org/10.1007/978-3-030-46187-4_9

Purpose of Committee Work

- Provide common language
- Ensure FUNCTIONAL Standards
- Provide optional resource for new programs or for revision for existing programs
- Ensure voices are heard from variety of programs and populations

Committee Composition

Chair: Ali Williams, AFWC

Liaison to COE: Rebecca Simon, ALC Chair

Committee Members: will be chosen to represent programs from various geographic regions, various sizes and types of programs

(most likely will have one template for OTA and one for OT, but will work together on this committee)

End product will be a GUIDE programs can CHOOSE to utilize, not a mandate from any source

INTERESTED?





American
Occupational Therapy
Association