



Approving University Official(s): Vice President and Chief Financial Officer; Vice President for Operations and Chief Operating Officer, Provost
Responsible Office: Provost; Human Resources; Student Affairs; Office of Civil Rights and Title IX Compliance
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REASONABLE ACCOMMODATION POLICY

Policy Statement

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act (ADA), the Pregnant Workers' Fairness Act (PWFA), Title IX of the Education Amendments of 1972 (Title IX), Title VII of the Civil Rights Act of 1964 (Title VII), and applicable state laws, Northwestern University will reasonably accommodate students, employees and job applicants, and third parties who require accommodations on the bases of disability, pregnancy and lactation, and religion, unless a fundamental alteration or undue hardship applies.

Purpose

This Policy: (1) names responsible offices overseeing accommodation requests for specific subsections of the University community, and clarifies the responsibilities of each office regarding confidentiality and reporting; and (2) provides instructions for requesting each type of accommodation and outlines the expected process.

Audience

This policy applies to all University community members, as well as third parties who request accommodations under this Policy.

Definitions

AccessibleNU ("ANU"): An office within the Division of Student Affairs that provides accommodations to students with disabilities.

Accommodation: A modification or adjustment to a program, service, job, or application process that makes it possible for the following to enjoy equal opportunities: (1) individuals with disabilities; (2) individuals with pregnancy or related conditions; and (3) individuals observing sincerely held religious beliefs.

Disability: A physical or mental impairment which substantially limits one or more major life activities such as walking, seeing, hearing, breathing, bending, lifting, learning, speaking or sitting.

Employee: For purposes of this Policy, “employee” means all full-time and part-time faculty, University staff, student employees, wage employees (including temporary employees), professional research staff, and post-doctoral fellows.

Fundamental alteration: A change to an academic program, service, or activity that significantly changes the essential nature of the program, service, or activity.

Human Resources (“HR”): An office at the University that oversees employee performance, resources, benefits and related policies.

Individual with a Disability: An individual who has: (1) a physical or mental impairment which substantially limits one or more major life activities such as walking, seeing, hearing, breathing, bending, lifting, learning, speaking or sitting; (2) a record of such an impairment; and/or (3) is regarded as having such an impairment.

Job Applicant: An individual who submits an application for a vacant position at the University.

Office of Civil Rights and Title IX Compliance (“OCR”): An office that serves as a University-wide resource on disability- and accessibility-related information, procedures and services for the University community. This office oversees disability accommodations for employees, student employees, and third parties; pregnancy accommodations for employees, student employees and students; and religion accommodations for employees.

Office of the Provost: An office that serves as the University’s central authority on academic policies, procedures, and standards governing the educational enterprise. This office assists deans and faculty members in responding to students’ academic religious accommodation requests,

Pregnancy: Pregnancy means (1) pregnancy, childbirth, termination of pregnancy, or lactation; (2) medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; (3) recovery from pregnancy, lactation, or related medical conditions.

Residential Services: An office that oversees student residences at the University. Residential Services manages the Housing and Dining Accommodation Request portal in conjunction with ANU and Dining Services. Students can submit housing and dining religious accommodation requests through this portal.

Student: An individual who has gained admission to the University, or has attended or is attending Northwestern University; and whose records are in the files of the University. Attendance is defined as the date of the first enrollment at the University or participation in a University sponsored program or activity, whichever occurs earlier.

Student Employee: This term includes the following:

- (1) Undergraduate students¹ employed in student-worker positions; and
- (2) Graduate students and Ph.D candidates who are employed as Teaching Assistants or Research Assistants.

Third Party: An individual who is neither a student nor an employee as defined under this Policy, and who utilizes University services and/or attends a University program or event. This includes visitors to campus; contractors; and individuals participating in University investigatory and misconduct processes.

¹ Accommodation requests related to undergraduate students who serve as Resident Assistants, while not employees of the University, should follow the guidance for Employees, Student Employees and Job Applicants as outlined in this policy.

Undue hardship: A change to the work environment that would impose significant operational difficulties and/or financial strain.

Policy Implementation

I. Disability Accommodations

A. Students

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the student has provided written consent for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies or unless otherwise authorized/required by law.

b. Responsibilities

- i. **Students:** Students who are seeking or receiving a disability accommodation are responsible for taking the following steps in a timely manner: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
- iii. **Individuals receiving disclosure of possible accommodation need:** Students may disclose possible accommodation needs to employees. In such cases, employees should refer students to the appropriate accommodation office for further assistance. Employees who receive disclosures are not required to report such potential needs directly to the respective accommodation office. Employees should keep such disclosures confidential.

c. Academic Accommodations

- i. **How to request academic accommodations:** Students who wish to request disability accommodations for academic purposes should register online through [ANU's website](#). For registration assistance or questions, students should contact ANU at accessiblenu@northwestern.edu or 847-467-5530. Students who are enrolled at the Qatar campus who wish to request disability accommodations should contact ANU-Q at accessible@qatar.northwestern.edu.
- ii. **Basic overview of accommodation process:** ANU will conduct an interactive process as needed with the student, their healthcare provider(s), and the relevant

departments. ANU reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in a fundamental alteration. ANU is the final decisionmaker for academic accommodation requests.

d. Housing and Dining Accommodations

- i. **How to request a housing and/or dining accommodation:** Students who wish to request disability accommodations for University housing and meal plans should register online through [ANU's website](#). For registration assistance or questions, students should contact ANU at accessiblenu@northwestern.edu or 847-467-5530.
- ii. **Basic overview of accommodation process:** ANU, in consultation with Residential and Dining Services, will conduct an interactive process as needed with the student, their healthcare provider(s), and the relevant departments. ANU reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in a fundamental alteration of a program, service, or activity. Housing assignments are based upon space availability at the time of the request. All housing accommodation requests are processed in the order they are received. ANU is the final decisionmaker for University housing and dining accommodation requests.

B. Employees, Student Employees and Job Applicants

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies, the employee or job applicant has provided written consent for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies, or unless otherwise authorized/required by law.

b. Responsibilities

- i. **Employees, Student Employees and Job Applicants:** Employees, student employees and job applicants who are seeking or receiving a disability accommodation are responsible for taking the following steps in a timely manner: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.

- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
 - **For offices overseeing hiring processes:** Such offices are responsible for developing internal procedures to respond to accommodation requests from job applicants in a timely manner.
- iii. **Individuals receiving disclosure of possible accommodation need:** Employees and job applicants may disclose possible accommodation needs to their colleagues, supervisors, and/or persons overseeing the job application process. In such cases, the employee or job applicant should be referred to the appropriate internal contact overseeing the hiring process and/or accommodation office for further assistance. Persons to whom the potential need is disclosed should keep the disclosure confidential. Persons receiving the disclosure do not need to report it to OCR, unless further assistance from OCR is necessary to facilitate the accommodation process.

c. Employee Accommodations

- i. **How to request employment accommodations:** Faculty, staff and student employees who wish to request disability accommodations should contact OCR at accommodations@northwestern.edu or 847-467-6165. Faculty, staff and student employees can also fill out the [Reasonable Accommodation Request Form](#) located on the OCR [Disability Accommodations webpage](#).
- ii. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the faculty or staff member, their healthcare provider(s), and relevant departments (including HR). OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship. OCR is the final decisionmaker for faculty and staff employment accommodation requests.
- iii. **Coordination with ANU (for student employee requests):** If a student is already registered with ANU, the student can sign an authorization to share ANU's information with OCR, for greater ease of documentation in the employee accommodation process. OCR and ANU will also coordinate as necessary if the student employee's accommodation request involves housing and dining as it relates to the student's Residential Services employment duties.
- iv. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the student employee, their healthcare provider(s), and relevant departments (including HR). OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine

whether a requested accommodation would result in an undue hardship. OCR is the final decisionmaker for student employee accommodation requests.

d. Job Applicant Accommodations

- i. **How to request accommodations:** Job applicants who wish to request disability accommodations should contact the Human Resources contact listed in the application form, or OCR at accommodations@northwestern.edu or 847-467-6165.
- ii. **Basic overview of accommodation process:** The HR representative overseeing the application process, in consultation with OCR, will conduct an interactive process as needed with the job applicant. While most accommodation requests related to a job application process are expected to be reasonable on their face, HR and/or OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in an undue hardship.

C. Third Party Accommodations

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the third party has provided written consent for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies, or unless otherwise authorized/required by law.

b. Responsibilities

- i. **Third Party:** Third parties who are seeking or receiving a disability accommodation are responsible for taking the following steps in a timely manner: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
 - **Units and departments that host events:** Such units and departments are responsible for developing internal procedures to respond to accommodation requests in a timely fashion.
- iii. **Individuals receiving disclosure of possible accommodation need:** Third parties disclosing a potential accommodation need should be referred to the

appropriate accommodation office for further assistance. Persons to whom the potential need is disclosed should keep the disclosure confidential. Reporting the individual's potential accommodation need to the accommodation office is not required for disability accommodation requests, unless that office's assistance is necessary to facilitate the accommodation process.

c. Third Party Accommodations

- i. **How to request accommodations:** Third parties who wish to request disability accommodations for an event should contact the event coordinator. Event attendees may also contact OCR at accommodations@northwestern.edu or 847-467-6165. OCR may then coordinate with the event coordinator and/or other entities as needed. All other third parties can contact OCR to request accommodations.
- ii. **Basic overview of accommodation process:** The event coordinator and/or OCR will conduct an interactive process as needed with the third party, their healthcare provider(s), and relevant departments. While most accommodation requests related to an event are expected to be reasonable on their face, the event coordinator and/or OCR reserve the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in an undue hardship.

II. Pregnancy and Lactation Accommodations

- a. **Confidentiality:** Offices handling information received in the course of a pregnancy and related conditions, including lactation, accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the requestor has provided written consent for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies, or unless otherwise authorized/required by law..
- b. **Reporting obligations:**
 - i. If an **employee** indicates that they may need an accommodation related to pregnancy or related conditions, they can be provided OCR's contact information to request accommodations.
 - ii. If a **student** discloses their pregnancy or related conditions to a University employee, that employee should provide OCR's contact information to the student, and let the student know that OCR can assist the student with their accommodation request.
- c. **How to request pregnancy and related conditions (including lactation) accommodations:** The Title IX Coordinator or their designee is responsible for all pregnancy- and related conditions accommodation requests. To request an accommodation, individuals can contact OCR at accommodations@northwestern.edu,

847-467-6165. Individuals can also complete the [Reasonable Accommodation Request Form](#).

- d. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the individual, their healthcare provider(s), and relevant departments. Though documentation will generally not be required for common impacts of pregnancy and lactation, as most pregnancy- and lactation-related accommodation requests will be presumed reasonable, OCR reserves the right to request additional clarifications if it is necessary to assess reasonable accommodations for a given individual. OCR will be the final decisionmaker on pregnancy accommodation requests.
- e. **Lactation resources:** The University will provide clean, private lactation spaces to students and employees. Students and employees who need to request access to the lactation spaces and related resources should utilize the lactation support resources in Human Resources at lactation@northwestern.edu. OCR will refer requests for lactation space usage and related resources to HR and will coordinate with them as needed on lactation accommodation requests. OCR will be the final decisionmaker on lactation accommodation resources that go beyond the simple provision of resources readily available through HR.

III. Religion Accommodations

- a. **Confidentiality:** Offices handling information received in the course of a religion accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the requestor has provided written consent for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies, or unless otherwise authorized/required by law.
- b. **Responsibilities**
 - i. **Employees and students:** Employees and students who are seeking or receiving a religion accommodation are responsible for taking the following steps in a timely manner: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
 - ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
 - iii. **Individuals receiving disclosure of possible accommodation need:** Employees who receive a potential accommodation need from students, other employees under their supervision, and/or third parties should refer individual to the appropriate accommodation office for further assistance. Employees who receive disclosures are not required to report such potential needs directly to the respective accommodation office. Employees should keep such disclosures confidential.

c. Student Religion Accommodations

- i. **How to request academic accommodations:** Students who wish to request religion accommodations that impact their academic programs (i.e. classes or exams) should submit their request in writing to the faculty member within the first two weeks of the term.
- ii. **Basic overview of academic accommodation process:** The faculty member, in consultation with their Dean's office and the Office of the Provost as needed, will decide whether to grant the accommodation. If there is any uncertainty about the reasonableness of a religion accommodation, the faculty member should contact the Office of the Provost for assistance. The Office of the Provost will then conduct an interactive process as needed with the student, the faculty member, and/or relevant departments. The Office of the Provost reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship.
- iii. **Requesting housing accommodations:** Students who wish to request housing accommodations due to their religious beliefs and practices can submit requests through the Housing Portal. Residential Services will process the request within 4 weeks. Student employees working as RAs who need to request religion accommodations for housing should follow the process laid out in Section III(d) of this Policy.

d. Employee, Student Employee and Job Applicant Religion Accommodations

- i. **How to request accommodations:** Employees, student employees and job applicants who wish to request religion accommodations should contact OCR at accommodations@northwestern.edu or 847-467-6165.
- ii. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the student and relevant departments. OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship. OCR is the final decisionmaker for employee, student employee and job applicant religion accommodation requests.

IV. Grievances

- a. Individuals who experience the following may file a grievance:
 - i. Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
 - ii. Disagreement with a determination made on an accommodation request, and/or
 - iii. Concerns about discriminatory treatment during the interactive accommodation process.

- b. Grievances should be filed as soon as the individual becomes aware of the alleged violation.
- c. After a grievance is received, OCR or the Vice President for HR, or their designee, will acknowledge receipt of grievances in a timely manner.
 - i. Grievances overseen by OCR will be handled according to the procedures laid out in the Policy on Discrimination, Harassment and Sexual Misconduct.
 - ii. Grievances overseen by the Vice President for HR's office will be handled according to HR investigative procedures.
- d. **Contacts for filing grievances are as follows:**
 - i. **Student disability grievances for academic and housing/dining accommodation:**
 - 1. ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
 - 2. In the case of a grievance involving academic, housing, and dining accommodations, students are encouraged to first follow ANU's accommodation appeal process before filing a grievance with OCR. However, students may opt to go straight to OCR. ANU's appeal process is available for review on [ANU's Appeal and Grievance Procedures webpage](#).
 - ii. **Employee disability accommodations:**
 - 1. ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
 - 2. If the grievance concerns a determination made by the ADA Coordinator's office on an accommodation process, the employee or job applicant may instead contact:
 - a. Vice President for Human Resources
1800 Sherman Ave., Suite 4100
Evanston, IL 60201
Phone: (847) 467-1466
Officeofhumanresources@northwestern.edu
 - iii. **Third party disability accommodations:**
 - 1. ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University

1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

iv. Student and employee pregnancy accommodations:

1. Emily Babb
Associate Vice President for Civil Rights and Title IX Compliance
Title IX Coordinator
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
titleixcoordinator@northwestern.edu

v. Student religion accommodations:

1. Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

vi. Employee religion accommodations:

1. Vice President for Human Resources
1800 Sherman Ave., Suite 4100
Evanston, IL 60201
Phone: (847) 467-1466
Officeofhumanresources@northwestern.edu

- vii. Individuals can also submit a grievance through the Discrimination and Harassment Report Form which is located on the NUhelp Share a Concern webpage.

Consequences of Violating this Policy

Failures to fulfill the reporting obligations set forth in this policy will be referred to the appropriate office for corrective action.

Related Information

[Policy on Discrimination, Harassment and Sexual Misconduct](#)
[Policy on Digital Accessibility](#)
[Policy on Service, Assistance, and Other Animals at Northwestern](#)

Contacts

The following office can address questions regarding this Policy:

Office of Civil Rights and Title IX Compliance

1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
titleixcoordinator@northwestern.edu

History

Supersedes policy dated September 1, 2025.

Policy URL:

<https://www.northwestern.edu/civil-rights-office/policies-procedures/policies/reasonable-accommodation-policy-2025-2026.pdf>