

# UNIVERSITY OF SCIENCE AND ARTS OF OKLAHOMA

## MINUTES OF THE BOARD OF REGENTS REGULAR MEETING

**Thursday, September 11, 2025**  
1727 W. Alabama Avenue, Chickasha, OK 73018

1. **Call to Order:** Chair Diane Ming called the meeting to order at 1:00 p.m.
2. **Announcement of the Filing of Meeting Notice and Posting of Agenda in Accordance with the Open Meeting Act:** President Hale announced the filing of the meeting notice and posting of agenda was done in accordance with the Open Meeting Act.
3. **Roll Call** was taken. Regents in attendance were Amanda Conley, Chet Hitt, Diane Ming, Suzanne Reynolds, Cale Walker and Kelly Wilkerson. JJ Francais was absent.
4. **The Pledge of Allegiance** was recited by those in attendance.
5. **Introductions:** President Hale introduced and welcomed Kyle Shifflett, deputy general counsel for the Attorney General's office and counsel for USAO and Associate District Judge Joseph Young, who was on hand to administer the oath of office for Mr. Hitt.
6. **Presentations:** Judge Young administered the oath of office for Mr. Chet Hitt, who joins the USAO Board of Regents and will serve a seven-year term to be completed June 2032. President Hale welcomed Regent Hitt to the board.
7. **Discussion and vote to approve/disapprove the minutes of the June 16, 2025, Special Meeting:** The minutes of the June 16, 2025 special meeting were presented. Having no additions or corrections, Regent Walker made a motion to approve the minutes as presented. Regent Reynolds seconded the motion. Roll call was taken with Regent Ming voting yes, Regent Reynolds voting yes, Regent Walker voting yes, and Regent Wilkerson voting yes to approve the minutes. Regent Conley and Regent Hitt abstained from voting. The motion carried with 4 yes votes.
8. **Discussion and vote to approve/disapprove the minutes of the July 23, 2025 special meeting:** The minutes of the July 23, 2025 special meeting were presented. Having no additions or corrections, Regent Walker made a motion to approve the minutes as presented. Regent Reynolds seconded the motion. Roll call was taken with Regent Ming voting yes, Regent Reynolds voting yes, Regent Walker voting yes, and Regent Wilkerson voting yes to approve the minutes. Regent Conley and Regent Hitt abstained. The motion carried with 4 yes votes.
9. **Communications to the Board On Upcoming Events and Special Programs:**  
President Hale made aware the following announcements and upcoming events:
  - Renaming of the Student Center to the Katie Neill Student Union
  - New federal standards on ensuring accessibility and compliance for online courses
  - Employee performance evaluations are completed for FY25**Upcoming Events:**  
9/12/25 USAO Alumni Night at OKC Comets game. 7:00 pm–10:30 pm. Chickasaw Bricktown Ballpark.  
9/19/25 Men's Soccer vs MidAmerican Christian University. 3:30 pm. McLaughlin Field.  
Volleyball vs Southwestern Christian University. 6:00 pm. Fieldhouse.

Young Conductors Symposium. 8:00 am – 5:00 pm. Te Ata Memorial Auditorium.  
9/20/25 Women's Soccer vs Stephens College. Noon. McLaughlin Field.

Volleyball vs Oklahoma City University. 3:00 pm. Fieldhouse.

9/26/25 Men's Soccer vs Southern Nazarene University. 7:00 pm. McLaughlin Field.

9/27/25 Women's Soccer vs John Brown University. 4:00 pm. McLaughlin Field.

Men's Soccer vs John Brown University. 6:30 pm. McLaughlin Field.

9/29/25 Men's Soccer vs Oklahoma Wesleyan. 7:00 pm. McLaughlin Field.

9/30/25 Women's Soccer vs Oklahoma Wesleyan. 5:00 pm. McLaughlin Field.

Men's Soccer vs Oklahoma Wesleyan. 7:30 pm. McLaughlin Field.

**10. Reports from Association Representatives:** Reports were submitted in advance from the Faculty Association, Alumni Association and Staff Association for updates to those areas.

**11. Presentation of Monthly Financial Statements:** Controller David Smith presented the financial statements to the Board. No other action was necessary. See appendix A., pp.6-8

**12. Presentation of Report on Financial Aid for FY 2024-25:** Financial Aid Director Robyn Rogers presented the annual Financial Aid report for the University. No action was necessary.

**13. Discussion and vote to approve/disapprove the Americans With Disabilities Act of 1990 (ADA) and USAO Employee Accommodations Policy and Procedure:** The Policies and Procedures Committee met earlier in the day to review and discuss the ADA and Employee Accommodations Policy and Procedure. On recommendation from committee, Regent Conley made a motion to approve the policy as written. Regent Wilkerson seconded the motion and the motion carried by unanimous vote.

See appendix B, pp 9-15

**14. Discussion and vote to approve/disapprove Personnel Actions:** Personnel actions included new appointments, changes in status, resignations, retirements and newly added adjunct appointments for Fall 2025. Regent Walker made a motion to accept the personnel actions as listed. Regent Wilkerson seconded the motion and the motion passed with a unanimous vote.

**A. APPOINTMENTS:**

Conner King, effective June 3, 2025; Security Officer

Laura Barrantes, effective June 3, 2025; Assistant Women's Soccer Coach

Caleb Stuckey, effective July 21, 2025; Groundskeeper (PT)

Malik Mohammed, effective July 9, 2025; Head Men/Women's Reserve Soccer Coach (PT)

Shaleia Jamison, effective July 1, 2025; Assistant Women's Basketball Coach (PT)

Ashton Callahan, effective July 1, 2025; Accounting Clerk

Shelby Hurst, effective July 7, 2025; Director of Development

Don Morris, effective July 17, 2025; VP of Business and Finance

Reece Reading, effective July 28, 2025; Assistant Baseball Coach (part-time)

Hannah Thompson, effective August 1, 2025; Public Relations Coordinator

Keely Kingsley, effective August 1, 2025; Assistant Softball Coach JV (PT)

Kyle Cox, effective August 4, 2025; Administrative Assistant to the School of Arts and Humanities

Alexa Sevenstar, effective August 4, 2025; Custodian

Josh Price, effective August 13, 2025; Maintenance Office Assistant

Jaycee Foust, effective August 14, 2025; Groundskeeper (PT)

Riley Merrill, effective August 22, 2025; Recruitment & Admissions Specialist  
Jared Halphin, effective August 21, 2025; Assistant Professor of Business Administration  
Reza Gheibi, effective August 21, 2025; Instructor of Computer Science  
Kevin Jennings, effective August 21, 2025; Assistant Professor of Social Studies  
Samantha McLendon, effective August 21, 2025; Assistant Professor of Early Childhood and Special Education  
Sara Baird, effective August 21, 2025; Visiting Instructor of Technical Theatre  
Jessica Mason, effective August 21, 2025; Instructor of Deaf Education

**B. CHANGE IN STATUS:**

Jordan Vinyard, effective July 1, 2025; Dean of the School of Arts and Humanities  
Blakely Flores, effective August 1, 2025; Administrative Assistant to Nash Library  
Brenda Brown, effective August 1, 2025; Associate Dean of the School of Arts and Humanities  
Emily Schumacher, effective September 1, 2025; Assistant Professor of Anthropology & Interdisciplinary Studies  
Adelina Flores, effective August 18, 2025; Program Coordinator for the Neill-Wint Center for Neurodiversity

**C. RESIGNATIONS:**

JP Audas, effective June 30, 2025, Sr. VP of External Relations/Executive Director for USAO Foundation  
Allen Kaulaity, effective July 25, 2025; IT Tech I  
Brian Tyler, effective July 29, 2025; Custodian  
Jennifer Reeves, effective July 31, 2025; Director of Operations USAO Foundation

**D. RETIREEES:**

None

**E. FALL 2025 ADJUNCT LIST – Newly added**

**School of Arts & Humanities:**

|                 |                              |
|-----------------|------------------------------|
| Tamara Powell   | Adjunct of IDS               |
| Bryan Dick      | Adjunct of Theatre Arts      |
| Cady Wollenburg | Adjunct of Public School Art |
| Corey Hubbard   | Adjunct of Music Composition |

**School of Social Sciences & Business:**

|                  |                       |
|------------------|-----------------------|
| Elizabeth Peters | Adjunct of Psychology |
| Amanda Coldiron  | Adjunct of Psychology |

**School of Science and Kinesiology:**

|               |                                               |
|---------------|-----------------------------------------------|
| Elsie Schafer | Adjunct of Kinesiology; Adjunct of Psychology |
|---------------|-----------------------------------------------|

**School of Education and Speech-Language Pathology:**

|                 |                      |
|-----------------|----------------------|
| Brittanie Neito | Adjunct of Education |
|-----------------|----------------------|

**15. President's Report:**

President Kayla Hale noted the sudden passing of long time and current faculty member, Dr. Linda McElroy. Dr. McElroy recently completed 30 years of service to the School of Education. Her presence will be greatly missed. The University also just learned of the death of former retired faculty member, Dr. Frank Dorman. Dr. Dorman taught physics as USAO from 1967 until 2011.

Other topics of the President's report included:

## **New Revenue**

- Undergraduate credit hour production has increased 8% = \$250,000
- Minerals lease with Haggard Land Co. = \$350,000 and 1/5<sup>th</sup> royalties
- Notable private gifts to the USAO Foundation

## **Fundraising Progress**

### **Notable Recent Gifts and Commitments**

- Billye Cheatum (OCW '55) - \$100,000 estate gift commitment
- Jesse Kinley Trust - \$65,000 for an existing endowed IDS chair
- Hazel Evans Trust - \$40,000 for Deaf Education scholarships
- OSRHE - \$40,000 for micro-credential development
- Kelly Nunn - \$30,000 for an endowed scholarship in education
- Krista Jones, Kathy Black and Mo Anderson - \$17K for a new softball scoreboard

### **Year-to-date cash in the door**

- FY26 to date: \$258,860
- 84% increase from this time last year (\$116,970)
- 1908 Society Members: 58 (\$13K annually unrestricted)

## **Safety and Security**

### **Campus Safety and Security**

- New cameras installed with focus on maintenance facility
- New DVRs purchased to ensure long-term image capture
- Talks underway with CPD to expand officer visibility on campus
- Multifactor Authentication went into effect on 9/8/25
- Keyless building access being explored

## **USAO's Economic Impact**

### **Report from the Economics Center (FY24)**

- \$49.5M in economic output
- Supported 593 jobs with wages equaling \$28.2M
- In FY24, every \$1 in state appropriations to USAO generated \$7.34

## **Partnerships Update**

- OU College of Nursing – Campus visit on 9/9
- UALR Clinton School of Public Service – Campus visit on 9/18
- OU School of Engineering – Conversations over the summer. Multiple graduate degree pathways for physics, chemistry, mathematics

- Rose State College – Art student recruitment focus
- Chickasha High School – Establishment of internship opportunities in art and theatre
- Rogers State College – Pathway to a MS in Cyber studies

#### **Academic Affairs**

- Update on the Interdisciplinary Studies project
- Assessment and Higher Learning Commission report
- Academic Calendar reform
- Prior Learning Assessment changes

#### **Enrollment Management and Student Affairs**

##### **Campus Composite**

- Nearly 1,100 students from 35 states and 66 countries
- 93% receive scholarships or financial aid
- 13:1 student to faculty ratio
- 47% of USAO students graduate with no debt

**16. Time and Place of Next Meeting – Thursday, November 13, 2025, 1:00 p.m., USAO, Student Center, Regents Room, 1727 W. Alabama Ave., Chickasha, Oklahoma 73018.**

**17. Discussion and vote to adjourn.** Having no other business, Regent Reynolds made a motion to adjourn, and Regent Walker made the second. The motion passed by unanimous vote and the meeting adjourned at 2:10 p.m.

UNIVERSITY OF SCIENCE AND ARTS OF OKLAHOMA  
STATEMENT OF CURRENT FUND EXPENDITURES AND BALANCES  
EDUCATION AND GENERAL BUDGET, 2025-26  
FOR PERIOD ENDING AUGUST 31, 2025

| FUNCTION              | E&G<br>BUDGET<br>2025-26 | FISCAL YEAR<br>TO-DATE<br>EXPENDITURES | FISCAL YEAR<br>TO-DATE<br>ENCUMBRANCES | FREE<br>BALANCE | % OF<br>BUDGET<br>EXPENSED<br>2025-26 |
|-----------------------|--------------------------|----------------------------------------|----------------------------------------|-----------------|---------------------------------------|
| Instruction           | 5,864,116.00             | 975,251.82                             | 745.72                                 | 4,888,118.46    | 20%                                   |
| Research              | 201,945.00               | 41,372.33                              | 1,277.00                               | 159,295.67      | 27%                                   |
| Public Service        | 5,000.00                 | -                                      | -                                      | 5,000.00        | 0%                                    |
| Academic Support      | 1,680,543.00             | 333,605.73                             | 307,612.80                             | 1,039,324.47    | 62%                                   |
| Student Services      | 1,606,585.00             | 281,993.20                             | 134,910.40                             | 1,189,681.40    | 35%                                   |
| Institutional Support | 2,643,736.00             | 404,544.81                             | 204,674.05                             | 2,034,517.14    | 30%                                   |
| Physical Plant        | 2,559,055.00             | 420,870.75                             | 862,133.84                             | 1,276,050.41    | 101%                                  |
| Scholarships          | 728,048.00               | -                                      | -                                      | 728,048.00      | 0%                                    |
| TOTAL E&G             | 15,289,028.00            | 2,457,638.64                           | 1,511,353.81                           | 11,320,035.55   | 34%                                   |

UNIVERSITY OF SCIENCE AND ARTS OF OKLAHOMA  
EDUCATION AND GENERAL INCOME STATEMENT  
FOR PERIOD ENDING AUGUST 31, 2025

| INCOME CATEGORY                                            | ESTIMATED<br>INCOME FOR<br>2025-26 | YTD<br>INCOME   | INCOME AS<br>A % OF<br>2024-25 |
|------------------------------------------------------------|------------------------------------|-----------------|--------------------------------|
| STATE APPROPRIATIONS                                       | 7,107,257.00                       | 1,125,323.00    | 16%                            |
| STUDENT TUITION & FEES, net                                | 8,172,685.00                       | 4,758,547.50    | 58%                            |
| TOTAL FEES AND STATE APPROPRIATIONS                        | 15,279,942.00                      | 5,883,870.50    | 39%                            |
| ORGANIZED ACTIVITIES RELATED<br>TO EDUCATIONAL DEPARTMENTS | 20,000.00                          | 3,250.00        | 16%                            |
| REIMBURSEMENTS, CONTRACTS, OTHER                           | 1,382,538.00                       | 116,883.68      | 8%                             |
| TOTAL INCOME                                               | \$ 16,682,480.00                   | \$ 6,004,004.18 | 36%                            |

UNIVERSITY OF SCIENCE AND ARTS OF OKLAHOMA  
INCOME STATEMENT  
FOR PERIOD ENDING AUGUST 31, 2025

|                                     | REVENUES               | EXPENSES               | REVENUE (LOSS)         |
|-------------------------------------|------------------------|------------------------|------------------------|
| <b>AUXILIARY SYSTEMS OPERATIONS</b> |                        |                        |                        |
| RESIDENCE HALLS                     | 1,597,903.00           | 354,769.68             | 1,243,133.32           |
| FOOD SERVICE                        | 1,240,899.73           | 109,412.62             | 1,131,487.11           |
| STUDENT CENTER                      | 20,644.50              | 8,672.00               | 11,972.50              |
| BOOKSTORE                           | 50.14                  | -                      | 50.14                  |
| PRINTING SERVICE                    | 3,966.52               | 1,339.10               | 2,627.42               |
| <b>TOTAL</b>                        | <b>2,863,463.89</b>    | <b>474,193.40</b>      | <b>2,389,270.49</b>    |
| <b>AUXILIARY ENTERPRISES OTHER</b>  |                        |                        |                        |
| ATHLETICS                           | -                      | 305,837.46             | (305,837.46)           |
| STUDENT ACTIVITIES                  | 137,630.00             | 15,905.87              | 121,724.13             |
| <b>TOTAL</b>                        | <b>137,630.00</b>      | <b>321,743.33</b>      | <b>(184,113.33)</b>    |
| <b>RESTRICTED FUNDS</b>             |                        |                        |                        |
| STUDENT AID                         | 252,433.50             | 292,181.00             | (39,747.50)            |
| GRANTS                              | 22,044.58              | 25,263.82              | (3,219.24)             |
| <b>TOTAL</b>                        | <b>274,478.08</b>      | <b>317,444.82</b>      | <b>(42,966.74)</b>     |
| <b>AGENCY ACCOUNTS</b>              |                        |                        |                        |
| OTHER INCOME/EXPENSE                | 128,852.19             | 90,300.93              | 38,551.26              |
| USAOF                               | 44,629.69              | 85,006.57              | (40,376.88)            |
| STUDENT ORGS                        | 179,089.00             | 4,711.73               | 174,377.27             |
| <b>TOTAL</b>                        | <b>352,570.88</b>      | <b>180,019.23</b>      | <b>172,551.65</b>      |
| <b>TOTAL AUXILIARY</b>              | <b>\$ 3,628,142.85</b> | <b>\$ 1,293,400.78</b> | <b>\$ 2,334,742.07</b> |



### **University of Science and Arts of Oklahoma**

#### **ADA and Employee Accommodations Policy and Procedure**

Effective Date: 09/01/2025

Last Modified:

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#### **1.0 POLICY STATEMENT**

The University of Science and Arts of Oklahoma (USAO) is committed to providing equal employment opportunities and fostering an inclusive and accessible work environment for all qualified individuals, including those with disabilities. In compliance with the Americans with Disabilities Act of 1990 (ADA), as amended by the Americans with Disabilities Act Amendments Act of 2008 (ADAAA), and other applicable federal and state laws, USAO prohibits discrimination against qualified individuals with disabilities in all aspects of employment, including recruitment, hiring, promotion, training, compensation, benefits, and termination.

USAO will make good faith efforts to provide reasonable accommodations to qualified applicants and employees with disabilities, enabling them to perform the essential functions of their positions unless doing so would impose an undue hardship on the university or fundamentally alter the nature of the employment. The university is also committed to engaging in an interactive process with individuals requesting accommodations to determine effective and appropriate solutions. This policy also prohibits harassment or retaliation against any individual who requests an accommodation, files a complaint, or participates in an investigation related to disability discrimination.

#### **2.0 THE AMERICANS WITH DISABILITIES ACT**

The Americans with Disabilities Act of 1990 (ADA) and the Americans with Disabilities Act Amendment Act of 2008 (ADAAA), prohibit discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications.

Qualified individuals are protected from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment.

Disability discrimination includes failing to reasonably accommodate the known physical or mental limitation(s) of an otherwise qualified individual with a disability who is an applicant or employee, except when the requested accommodation would create an undue hardship.

### 3.0 DEFINITIONS

For this policy, the following definitions apply:

- **Disability:** As defined by the ADA, a person with a disability is an individual who:
  - Has a physical or mental impairment that substantially limits one or more major life activities (e.g., caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working).
  - Has a record of such an impairment.
  - Is regarded as having such an impairment (even if no actual impairment exists).
- **Qualified Individual with a Disability:** An individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.
- **Essential Functions:** The fundamental job duties of the employment position the individual holds or desires. A job function may be considered essential for several reasons, including but not limited to:
  - The reason the position exists is to perform that function.
  - There are a limited number of employees available among whom the performance of that job function can be distributed.
  - The function is highly specialized, and the incumbent is hired for his or her expertise or ability to perform that particular function.
- **Major Life Activity:** Major life activities include but are not limited to caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. A major life activity also includes the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.
- **Reasonable Accommodation:** Any modification or adjustment to the work environment, or to the manner or circumstances under which a position is customarily performed, that enables a qualified individual with a disability to perform the essential functions of that position. Examples may include, but are not limited to:

- Making existing facilities readily accessible and usable by individuals with disabilities.
- Job restructuring.
- Part-time or modified work schedules.
- Reassignment to a vacant position (if qualified).
- Acquisition or modification of equipment or devices.
- Adjustments or modifications of examinations, training materials, or policies.
- Providing qualified readers or interpreters.
- **Undue Hardship:** An action requiring significant difficulty or expense when considered in light of factors such as the nature and cost of the accommodation, the overall financial resources of the specific facility or institution involved, the overall financial resources of the university, and the type of operation of the university.
- **Interactive Process:** A collaborative discussion among the employee, their supervisor, and a designated university representative within the Office of Human Resources, Institutional Equity & Title IX (HR) to determine the nature of the limitations and explore effective, reasonable accommodations.

## 4.0 ROLES AND RESPONSIBILITIES

### 4.1 Employee/Job Applicant Role

- **Initiating a Request:** An employee or job applicant who believes they need a reasonable accommodation to perform the essential functions of their job or to participate in the application process should initiate a request. Requests can be made verbally or in writing to their immediate supervisor or, preferably, directly to the Office of Human Resources, Institutional Equity & Title IX. While a formal request form is not always required to initiate the process, it is always recommended to clearly communicate the need.
- **Providing Documentation:** The employee may be asked to provide appropriate medical documentation from a qualified healthcare professional that:
  - Verifies the existence of a disability.
  - Explains how the disability substantially limits a major life activity and impacts the employee's ability to perform essential job functions.
  - Suggests potential accommodations that would enable the employee to perform the essential functions of their position.
  - The university reserves the right to request additional documentation if the initial information is incomplete or insufficient to determine the need for accommodation or to identify an effective accommodation.
- **Engaging in the Interactive Process:** The employee is expected to actively participate in the interactive process with HR and their supervisor. This includes discussing the nature of their limitations, exploring possible accommodations, and evaluating the effectiveness of proposed solutions.

## 4.2 Supervisor Role

- **Receiving Requests:** If a supervisor receives an accommodation request, they should immediately notify and consult with HR. Supervisors should not attempt to determine eligibility or implement accommodations independently.
- **Collaborating with HR:** Supervisors will work collaboratively with HR to identify the essential functions of the employee's position, discuss the impact of the disability on job performance, and explore potential reasonable accommodations.
- **Implementing Accommodations:** Once an accommodation is determined and approved by HR, the supervisor is responsible for implementing the agreed-upon accommodation in a timely manner.
- **Maintaining Confidentiality:** Supervisors must maintain the confidentiality of all medical and disability-related information. Such information should only be shared with individuals on a "need-to-know" basis, as authorized by HR and applicable laws.

## 4.3 Office of Human Resources, Institutional Equity, and Title IX (HR) Role

- **Central Point of Contact:** HR is the designated office responsible for managing and coordinating all employee accommodation requests.
- **Interactive Process Facilitation:** HR will engage in a confidential, interactive process with the employee and their supervisor to:
  - Review the accommodation request and supporting documentation.
  - Determine if the employee is a "qualified individual with a disability" under the ADA.
  - Identify the essential functions of the position.
  - Explore potential reasonable accommodations.
  - Assess whether a proposed accommodation would create an undue hardship for the university.
- **Decision Making:** HR will make the final determination regarding reasonable accommodations. The decision will be communicated to the employee and the relevant supervisor.
- **Documentation and Record Keeping:** HR will maintain all medical and disability-related documentation in secure, confidential files separate from the employee's personnel file.
- **Training and Guidance:** HR will provide guidance and training to supervisors and employees regarding this policy and ADA compliance.

## 5.0 INTERACTIVE PROCESS

The interactive process is a flexible, informal process between the employee, their supervisor, and HR to identify the precise limitations resulting from the disability and potential reasonable accommodations that could overcome those limitations. This process may involve:

- Analyzing the particular job involved and its essential functions.
- Consulting with the individual with a disability to ascertain the precise job-related limitations imposed by the individual's disability and how those limitations could be overcome with a reasonable accommodation.
- Identifying potential accommodations and assessing the effectiveness each would have in enabling the individual to perform the essential functions of the position.
- Considering the preference of the individual with a disability and selecting the accommodation that is most appropriate for both the employee and the university.

## **6.0 CONFIDENTIALITY**

All information and records regarding an employee's disability, medical condition, or accommodation request will be treated as confidential and maintained in the Office of Human Resources, Institutional Equity & Title IX in files separate from general personnel files. This information will only be disclosed to individuals on a strict "need-to-know" basis (e.g., supervisors who need to be informed of necessary restrictions or accommodations, first aid/safety personnel if the disability might require emergency treatment, or government officials investigating compliance with the ADA).

## **7.0 DISCRIMINATION AND RETALIATION**

Section 504 of the Rehabilitation Act (Section 504) prohibits discrimination on the basis of disability in programs receiving federal financial assistance. Both the ADA and Section 504 prohibit retaliation for seeking protection of one's rights under these acts.

USAO strictly prohibits any form of retaliation against individuals who:

- Request a reasonable accommodation.
- File a complaint of disability discrimination.
- Assist in an investigation related to a disability discrimination complaint.
- Exercise any rights protected by the ADA or this policy.

Any employee found to have engaged in retaliation may be subject to disciplinary action, up to and including termination of employment.

## **8.0 ACCOMMODATIONS REQUEST PROCEDURE AND IMPLEMENTATION**

### **1. Requesting an Accommodation:**

- Employees submit a request by completing the Employee Accommodation Request Form and submitting it to the Office of Human Resources, Institutional Equity, and Title IX.
- If an employee initially makes a verbal request, they will be provided with the form and assistance if needed to ensure timely submission.

- The completed form should include a description of the condition, and the specific accommodation(s) requested.
- 2. Documentation Requirements:**
  - Medical documentation may be required to verify the disability and the need for accommodation.
  - The employee's healthcare provider must also complete the ADA Medical Inquiry Form as part of the documentation process.
  - Documentation must be from a licensed healthcare provider and verify that the individual has a qualifying disability under the ADA and explain functional limitations requiring an accommodation.
  - The scope of information requested will be limited to what is necessary to determine the existence of a disability and the necessity of the accommodation.
  - All documentation will be kept confidential and stored separately from personnel files.
- 3. Interactive Process:**
  - Upon receiving a request, HR will initiate the interactive process with the employee or applicant.
  - This process includes discussing the individual's needs and identifying potential accommodations.
  - The interactive process will typically begin within ten (10) business days of receiving the request and documentation.
- 4. Determination and Implementation:**
  - HR, in consultation with the supervisor and the employee, will determine if the request is reasonable.
  - A written decision will be provided to the employee within fifteen (15) business days of completing the interactive process.
  - Approved accommodations will be implemented as promptly as possible.
  - If the request is denied, the employee will receive a written explanation and may appeal the decision.
- 5. Grievance Procedure:**
  - Employees who disagree with the outcome of an accommodation request may file a written grievance within ten (10) business days of the decision.
  - Grievances should be submitted to the Chief Human Resources Officer.
  - The grievance will be reviewed by a designated ADA Compliance Officer or alternate administrator who was not involved in the initial decision.
  - A final written determination will be issued within ten (10) business days of the grievance submission.

## **9.0 SIGNIFICANT RISK OF HARM**

- USAO is not required to employ an individual who poses a significant risk of harm to the health or safety of self or others and who cannot perform the job at a safe level even with reasonable accommodation.

- In determining whether an individual poses a significant risk of harm, the university will make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or the best available objective evidence, to ascertain:
  - The nature, duration, and severity of the risk;
  - The imminence of the risk;
  - The probability that the potential injury will actually occur; and
  - Whether reasonable modification of policies, practices, or procedures will mitigate the risk.

## **10. SUPPORT SERVICES AND TECHNOLOGIES AVAILABLE**

USAO provides a wide range of services and assistive technologies to support employees, both faculty and staff, with disabilities. For more information and/or a list of available services and technologies, contact:

University of Science and Arts of Oklahoma  
Office of Human Resources, Institutional Equity and Title IX  
Troutt Hall, Room 306  
1727 W Alabama Ave, Chickasha, OK 73018  
Phone: 405-574-1350  
Email: [equalopportunity@usao.edu](mailto:equalopportunity@usao.edu)