

Creating Access: Internships and Field Experiences

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Tip Sheet

Overview

Field experiences, such as internships, practicums, and clinicals, offer students the opportunity to gain the real-world knowledge and skills they need to become gainfully employed. Deaf students have a right to these opportunities and experiences in the same manner as their hearing peers. Such experiences have the most rewarding outcomes when all parties—service providers, placement coordinators, and disability services professionals—work together to ensure an accessible placement for deaf students.

What legal mandates apply to field experiences as they relate to deaf individuals?

Just as it is discriminatory and unlawful to deny admission to a postsecondary institution based on disability, it is unlawful to deny participation in an internship based on disability. In fact, those responsible for selecting students for sites cannot inquire about disabilities as a part of the placement process. All qualified students should have access to the same options and choices.

Under the Americans with Disabilities Act (ADA), a qualified individual with a disability is a person who meets the qualifications for performing the essential functions of a position, whether accommodations are needed or not. For example, if the clinical site requires all applicants to complete a certain number of credit hours prior to applying for an internship, all individuals with or without a disability should be afforded the opportunity to meet this criterion. If the individual has a disability and meets the criteria, or qualifications, for the position, then the internship coordinator or employer can consider whether the individual can perform the essential functions with a reasonable accommodation once the individual discloses the need for accommodations.¹

Under Section 504 of the Rehabilitation Act and the ADA, universities that receive any federal funding have a responsibility to provide accommodations for students with disabilities during internship, practicum, or clinical experiences. Title III of the ADA applies to private educational institutions. In accordance with these laws, educational institutions are responsible for the cost of accommodations when field experiences are part of the academic program.

Title I of the ADA requires that employers with 15 or more employees provide qualified individuals with disabilities the same opportunities as their nondisabled peers in all stages of the recruitment, hiring, and employment process. Employers are also required to provide reasonable accommodations unless it creates undue hardship. Undue hardship is determined on a case-by-case basis, whereby the overall resources of the organization are taken into account when determining if the accommodation will create an undue burden.² In accordance with Title I, accommodations for field experiences that are offered by the employer are the responsibility of the employer.

Who is responsible for arranging accommodations?

All sponsored programs, activities, and services must be made accessible by the hosting entity, whether it is a school, employer, or organization. More specifically:



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- If the field experience is considered part of the academic program, the institution is responsible for providing and paying for requested accommodations.
- If the opportunity is offered by an organization or employer, the organization or employer may be responsible. If the intern is considered an employee, the intern is eligible for the same protections afforded other employees under the ADA.

What are the first steps in planning for internships/field experience accommodations?

When an individual participates in a field placement, it is recommended that the school and host site collaborate to provide effective accommodations. It is crucial that the deaf individual be involved in the process. Title II (which applies to state and local governments) and Title III (which applies to commercial facilities and private entities) of the ADA both state that primary consideration needs to be given to the individual making the request. As you move forward, consider doing the following:

- **Be informed.** Learn more about the institution's policies and responsibilities in providing accommodations for internships or field placements. Connect with others who have experience providing accommodations in specific settings.
- **Be proactive.** Begin conversations with all parties, including the individual, in advance of the placement or internship. Create a plan, including establishing important contacts and defining the role of the service provider in the placement.
- **Be flexible.** There are no hard and fast rules about accommodating field placements. Rather, determinations should be made on a case-by-case basis. Be prepared to explore alternative options if needed.

Related Resources

- Szymanski, C. A. (2010, November). An open letter to training directors regarding accommodations for deaf interns. *APPIC E-Newsletter*. Retrieved from www.tinyurl.com/appic2010
- Americans with Disabilities Act (ADA): www.ada.gov

Additional resources on this subject may be available at www.nationaldeafcenter.org/resources.

References

- ¹ The U.S. Equal Employment Opportunity Commission. (1997). *The ADA: Questions and answers*. Retrieved from www.eeoc.gov/facts/adaqa1.html
- ² The U.S. Department of Justice. (2015). *Fighting discrimination in employment under the ADA*. Retrieved from www.ada.gov/employment.htm



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Additional resources can be found at www.nationaldeafcenter.org