Assessment Accommodations Policy

Bioscience Core Skills Institute

Effective Date:	May 2026, updated September 2026
Supersedes:	Version 1.1
Approved By:	Angela Consani, CEO and Co-Founder
Review Cycle:	Annual or upon material change to applicable law
Applies To:	All BCSI credentialing assessments administered directly by BCSI staff or through authorized partner institutions

1. Purpose and Scope

The Bioscience Core Skills Institute (BCSI) issues performance-based digital credentials that certify a candidate has demonstrated specific laboratory skills to a documented standard under observed conditions. The value of a BCSI credential rests on its consistency: it must mean the same thing regardless of who holds it, which institution issued it, or where the assessment occurred.

This policy establishes BCSI's framework for responding to requests for assessment accommodations from candidates with disabilities. It is grounded in the following principle: BCSI will provide reasonable accommodations that allow equal opportunity to demonstrate a skill, while preserving the safety expectations and integrity of the performance standard that defines the credential.

This policy applies to all BCSI credentialing assessments administered by BCSI staff or through authorized partner institutions, including colleges, secondary schools, employer sites, and workforce training programs.

2. Legal Basis

BCSI operates as a national 501(c)(3) credentialing body. Its assessment activities are subject to the following legal frameworks:

- Title III of the Americans with Disabilities Act (ADA), which applies to places of public accommodation and organizations offering examinations or courses related to professional or occupational certification.
- Section 504 of the Rehabilitation Act, which applies when BCSI assessments are conducted through partner institutions receiving federal financial assistance.
- ADA Title II, which applies to public institutional partners, including community colleges and secondary schools that administer BCSI assessments, rather than to BCSI directly; those partners carry independent Title II obligations that BCSI's accommodation determinations do not satisfy or replace.

Under these frameworks, BCSI is required to provide reasonable accommodations in testing unless doing so would fundamentally alter what is being measured. The phrase "fundamentally alters what is being measured" is central to how this policy distinguishes between accommodations BCSI can provide and modifications it cannot. Approval of accommodations in a school or classroom environment does not automatically qualify a candidate for the same accommodations during BCSI credential assessments.

BCSI is not a covered entity under Title I of the ADA (employer obligations) and does not make employment decisions. This policy governs credential issuance only.

3. Core Principle: The Credential Must Be Consistent

A BCSI credential certifies that a person performed a specific skill to a specific standard. The rubric criteria, conditions of performance, and critical failure definitions attached to each badge are derived from employer job requirements and verified through BCSI's assessment development process. They are not arbitrary thresholds; they are the operational definition of job readiness for that skill.

Performance standards include technique, safety, procedural compliance, and where applicable, time-to-completion. Time requirements embedded in BCSI assessments reflect validated industry expectations for production, clinical, and regulated laboratory environments, where the ability to perform a skill within required timeframes is itself a component of job-ready competency.

This has a direct implication for accommodations. An accommodation is appropriate when it changes the conditions under which a candidate demonstrates the skill. An accommodation is not appropriate when it changes the standard to which the skill is judged, or when it removes a step that is itself the skill being assessed.

BCSI's credential metadata is public, machine-readable, and embedded in the badge. Employers, institutions, and workforce systems rely on that metadata to interpret what the credential means. Issuing a credential under materially different standards, without disclosure, would constitute misrepresentation to those downstream parties. BCSI will not do this.

4. Accommodation Categories

BCSI categorizes all accommodation requests into one of two categories. This framework governs all review and determination decisions.

Process Accommodations modify the conditions under which a candidate accesses or demonstrates a skill without altering the performance standard itself.

Standard Modifications alter the performance standard itself, including the criteria, thresholds, or essential functions the credential certifies. Standard Modifications are not approvable under this policy.

Category	Examples	BCSI Position
Process Accommodations	Extended time for written components Verbal rather than written responses for knowledge questions Rest breaks during multi-step assessments Large-print or screen-reader-compatible instructions Employer-equivalent adaptive equipment (e.g., ergonomic pipettors)	Reviewed and approved on a case-by-case basis. These modifications change how a skill is demonstrated, not what is demonstrated. Approval is presumed unless BCSI identifies a conflict with critical failure criteria or job-readiness standards.

Category	Examples	BCSI Position
Standard Modifications	Waiving or substituting a step designated as a critical failure criterion Removing a safety or regulatory compliance requirement Altering the performance standard to which a skill is judged Permitting assistance that would not be available in a comparable workplace setting	Not available. Modifications in this category fundamentally alter what the credential certifies. BCSI's legal and ethical obligation is to the integrity of the credential itself, which must mean the same thing regardless of who holds it.

The determination of whether an accommodation constitutes a Process Accommodation or a Standard Modification depends on whether the step or criterion at issue is designated as a critical failure criterion in the relevant assessment rubric. Critical failure criteria are documented in BCSI rubrics and represent actions or omissions that would result in specimen failure, safety violation, data integrity breach, or disqualifying regulatory non-compliance in a professional setting. They are not modifiable under this policy.

Time-to-completion is embedded in all BCSI assessment rubrics as an employer-validated performance standard, and currently functions as a critical failure criterion across all credentials. Requests to modify time requirements are reviewed individually against the specific credential rubric and relevant industry context. BCSI's ongoing engagement with employer and industry partners informs determinations about whether any credential-specific flexibility is appropriate. Where the industry basis for the time standard does not support modification, such requests will be treated as Standard Modifications and denied.

5. Adaptive Equipment

Requests to use adaptive or assistive equipment during BCSI assessments require individualized analysis. BCSI evaluates such requests against two questions:

- Is equivalent equipment reasonably available in comparable employer workplaces where BCSI credentialed candidates are likely to be placed?
- Does use of the equipment change the underlying skill being assessed, or change the conditions under which that skill is demonstrated?

If the answer to the first question is yes and the second is no, the accommodation is presumptively approved. If the equipment functions as a fundamental substitute for the skill itself (for example, automated equipment that performs a manual technique the badge certifies), BCSI will treat the request as a Standard Modification and decline it. BCSI will work with the requesting party to identify alternative credentialing pathways where they exist.

6. Request and Review Process

Step	Action
1. Request	Candidate or institutional partner submits BCSI Accommodation Request Form no later than 10 business days prior to the scheduled assessment date.

Step	Action
2. Documentation	Request must include: (a) documentation from a qualified professional identifying the functional limitation; and (b) a description of the specific accommodation sought. BCSI does not require a diagnosis; functional limitation documentation is sufficient.
3. Review	BCSI reviews the request within 5 business days. Review applies the two-category framework in Section 4. If the requested accommodation is a Process Accommodation and does not conflict with any critical failure criterion, it is approved. If review reveals a potential conflict, BCSI may request a meeting with the candidate and/or institutional partner to discuss alternatives.
4. Determination	BCSI issues a written determination to the requesting party. Approvals specify the exact accommodation to be implemented. Denials state the basis, citing the specific critical failure criterion or standard at issue.
5. Appeal	Candidates may appeal a denial within 10 business days of the determination. Appeals are reviewed by BCSI leadership not involved in the original decision. The appeal determination is final.

BCSI will make reasonable efforts to maintain confidentiality of accommodation documentation. Accommodation status is not disclosed to employers or third parties in badge metadata or credential records. The credential record reflects only that the candidate met the applicable performance standard.

7. Appeals

Candidates who receive a denial or partial approval may appeal the determination by submitting a written request to BCSI within 10 business days of notification.

An appeal must:

- identify the specific accommodation request and determination being challenged;
- state the basis for the appeal; and
- include any new or clarifying documentation from a qualified professional that was not part of the original submission.

Appeals will be reviewed by BCSI leadership not involved in the original determination. BCSI may consult subject matter experts or legal counsel as appropriate to the nature of the appeal.

Appeal outcomes may include:

- affirmation of the original determination;
- approval of the requested accommodation;
- approval of a modified or alternative accommodation; or
- remand for additional review with a request for further documentation.

BCSI will notify the candidate of the appeal outcome in writing within 10 business days of receiving a complete appeal submission. Appeal decisions are final.

Candidates who believe their rights under the ADA or Section 504 have been violated may contact the U.S. Department of Justice or the U.S. Department of Education Office for Civil Rights regardless of the status of any appeal with BCSI.

8. Institutional Partner Responsibilities

Partner institutions that administer BCSI assessments are responsible for:

- Informing enrolled candidates of their right to request accommodations under this policy prior to assessment enrollment.
- Facilitating transmission of accommodation requests to BCSI within the required timeframe.
- Implementing approved accommodations in coordination with BCSI staff or authorized evaluators.
- Maintaining documentation of the accommodation process consistent with their own Title II and Section 504 obligations.

BCSI's issuance of an accommodation determination does not relieve the institutional partner of its independent legal obligations to candidates under applicable federal and state law. Institutions with questions about their responsibilities should consult their own legal counsel.

BCSI does not make disability determinations or provide legal guidance to candidates or partner institutions.

9. Documentation and Recordkeeping

BCSI retains accommodation requests and determinations for a minimum of five years from the date of assessment. Records are maintained separately from credential issuance records and are not included in badge metadata. Access is limited to BCSI staff with operational need and to legal counsel.

10. Policy Review

This policy is reviewed annually and updated when material changes occur in applicable law, BCSI assessment rubrics, or credentialing scope. The CEO and Co-Founder is responsible for policy maintenance. Questions regarding this policy may be directed to info@bcsi.bio.

11. Definitions

Term	Definition
Accommodation	A modification to the process or conditions of an assessment that allows a candidate with a disability equal opportunity to demonstrate the skill being assessed, without altering the performance standard.
Critical Failure Criterion	A rubric-designated action or omission that results in automatic non-demonstration of competency, regardless of other performance. Critical failure criteria are tied to safety, regulatory compliance, specimen integrity, or data validity requirements in employer settings.
Functional Limitation	A documented impairment in a physical, sensory, cognitive, or psychological capacity that materially affects the candidate's ability to participate in an assessment under standard conditions.

Term	Definition
Performance Standard	The defined level of skill execution, including all required steps and critical failure criteria, that must be demonstrated for a BCSI credential to be issued.
Process Accommodation	An accommodation that changes how a skill is demonstrated without altering what is demonstrated or the standard to which it is judged.
Standard Modification	A change that would alter the performance standard, waive a critical failure criterion, or otherwise change what the credential certifies. Standard Modifications are not available under this policy.