

University Policy: Disability Access Policy

Policy Category: AU Community

Subject: Disability Access and Inclusion

Responsible Executive: Vice President for Inclusive Excellence

Office(s) Responsible for Review of this Policy: Office of Inclusive Excellence

Supplemental Documents: Section 504/ADA Grievance Procedures; ASAC Webpage: Registering for Accommodations; University Procedure: Procedure for Disability and Accessibility Accommodations for Faculty & Staff; HR Webpage: ADA and Workplace Reasonable Accommodations

Related University Policies: Digital Accessibility Policy; and Discrimination, Harassment, Retaliation, and Sexual Misconduct Policy and Grievance Procedures

I. SCOPE

This Disability Access Policy (“Policy”) applies to students, faculty, and staff of American University (“AU” or “the University”) and others (such as applicants for admission, applicants for employment, and visitors) who participate in or access University Programs or Activities.

This Policy states the University’s responsibilities to address barriers that impede equal access for individuals with disabilities to University Programs or Activities.

This Policy is distinct from and operates in coordination with the University’s Discrimination, Harassment, Retaliation, and Sexual Misconduct Policy (“Discrimination Policy”), which addresses allegations of discrimination or discriminatory conduct. Nothing in this Policy limits an individual’s right to pursue a concern through the University’s Discrimination Policy.

II. POLICY STATEMENT

The University is committed to making University Programs or Activities accessible to qualified individuals with disabilities. The University will provide reasonable accommodations, through an interactive process, to qualified individuals with disabilities, unless doing so would cause an undue hardship.

This resolve is grounded in applicable federal and District of Columbia disability access laws and standards, including the Americans with Disabilities Act of 1990, as amended (“ADA”), Section 504 of the Rehabilitation Act, as amended, and the DC Human Rights Act, and the University’s commitment to equity and the inclusion of all members of the AU Community.

III. DEFINITIONS

ADA/504 Coordinator: The designated University official responsible for coordinating the University's compliance with applicable legal authorities, including Section 504 of the Rehabilitation Act, the ADA, and the DC Human Rights Act.

AU Community: Students, faculty, and staff of American University and others (such as applicants for admission, applicants for employment, and visitors) who participate in or access University Programs or Activities.

Auxiliary Aids and Services: Services or devices that enable qualified individuals with disabilities to participate in, and enjoy the benefits of, University Programs or Activities. Auxiliary aids and services include but are not limited to qualified sign language interpreters on site or through video remote interpreting, real time computer aided transcription services, audio recordings, or Braille materials.

Digital Content: Any type of media (e.g., video, audio, etc.) created, stored, and distributed in a digital format as part of the online services, University Programs or Activities, or as part of or in support of any other services, programs or activities (e.g., classroom instruction, athletics and other activities open to the general public or members of the campus community).

Disability: With respect to an individual, a physical, or mental impairment that is not both transitory and minor that substantially limits one or more major life activities; a record of such an impairment; or being regarded as having such an impairment, whether or not the impairment limits a major life activity.

Employee: A person employed by the University either full- or part-time, including student employees, faculty, and staff, when acting within the scope of their employment.

Essential Requirement: A job duty or function, or program eligibility standard or criteria, which is fundamental to the nature or purpose of a University Program or Activity that cannot be eliminated, waived, or substantially modified, without materially altering the University Program or Activity.

Grievance: A written or oral communication describing a dispute related to a reasonable accommodation with respect to accessing or participating in a University Program or Activity. The ADA/504 Coordinator or designee investigates grievances under the Section 504/ADA Grievance Procedures.

Interactive Process: An individualized, good faith, and timely dialogue between the University and the individual requesting a reasonable accommodation, in which both parties exchange relevant information about the disability-related functional needs and barriers, to identify and evaluate potential effective reasonable accommodations.

Qualified Individual with a Disability: A person with a disability who meets and can perform the essential requirements of a University Program or Activity with or without reasonable accommodation.

Reasonable Accommodation: A modification or adjustment to policies, practices, procedures, and/or the environment, which enables a qualified individual with a disability to enjoy an equal opportunity to participate in and benefit from University Programs or Activities. Reasonable accommodations may include the provision of auxiliary aids and services.

Undue Hardship: Significant difficulty or expense when considered in light of the University's overall resources, operational needs, and nature of the accommodation requested. Accommodations that are excessively costly, unduly extensive, substantially disruptive to University operations, or that fundamentally alter the nature or operation of the University Program or Activity constitute an undue hardship and are not required.

University Information and Communications Technologies: An umbrella term used to describe all information and communications technologies purchased, developed, deployed, or used for University business, including but not limited to, the internet, wireless technologies, web-based sites and applications, online instructional content, software, computers, video conferencing, mass communications tools, and other media applications and services.

University Program or Activity: An event, program, activity, or similar circumstance where the University serves as a sponsor and exercises substantial control over the context.

IV. POLICY

- A.** Individuals responsible for the planning and implementation of University Programs or Activities must do so in compliance with this Policy to ensure qualified individuals with disabilities are afforded an opportunity to participate in an equally effective and integrated manner, with substantially equivalent ease of use, as those without disabilities.
- B.** The University will address disability access concerns with respect to University Programs or Activities. As part of this commitment, the University will provide qualified individuals with disabilities reasonable accommodations to participate in and benefit from University Programs or Activities. This Policy applies to students, employees, and others (including, applicants for admission, applicants for employment, and visitors) seeking to access or participate in University Programs or Activities.

C. Provision of Reasonable Accommodations

- 1. Employees and Applicants for Employment** may request a reasonable accommodation from the University through the Office of Human Resources ("HR").
 - a. The HR website maintains information related to employee accommodations and accommodations for applicants for employment.
 - b. HR maintains procedures for how employees or applicants may request reasonable accommodations. HR will engage the employee or applicant in the interactive process.
 - c. To request an accommodation or for more information, employees or applicants for employment should contact HR by calling (202)885-2607 or emailing employeerelations@american.edu.

2. Enrolled Students and Prospective Students may request a reasonable accommodation from the University through the offices listed below.

a. Enrolled Students

- i. The Office of Student Disability Support (“OSDS”) website maintains information related to student reasonable accommodations.
- ii. OSDS will engage the student in the interactive process.
- iii. To request an accommodation or for more information, students should contact OSDS by calling (202)885-3360 or emailing DisabilitySupport@american.edu.

b. Prospective students

- i. The Office of Admissions assists prospective students.
- ii. To request an accommodation or for more information, prospective students with disabilities should contact the Office of Admissions by calling (202)885-6060 or emailing admissions@american.edu.

3. Others seeking to participate in or access University Programs or Activities may request a reasonable accommodation from the program or activity.

4. Selection of Effective Reasonable Accommodations: The University has the ultimate discretion to choose between effective reasonable accommodations.

D. Responsible Offices for Disability Access Issues

Individuals with questions about disability access issues at the University may contact the following individuals:

- 1. ADA/504 Coordinator:** The ADA/504 Coordinator or designee provides guidance and education, refers matters to the appropriate University units, addresses grievances related to reasonable accommodations, and monitors the University’s progress in advancing disability access.
 - a. Contact information: 3201 New Mexico Avenue, NW, Suite 251, Washington, DC 20016; Telephone: (202)885-1366; Email: ADA504Coordinator@american.edu.
- 2. Digital Accessibility Program Manager:** The Digital Accessibility Program Manager or designee receives reports and coordinates the resolution process regarding accessibility of Digital Content and University Information and Communications Technologies.
 - a. Contact information: digitalaccessibility@american.edu.

E. Confidentiality

1. The University will maintain as confidential any personal medical information

provided during the reasonable accommodation process in accordance with legal requirements and University policies.

F. Section ADA/504 Grievance Procedures

1. The University has adopted a grievance process for AU Community members who wish to grieve a dispute related to a reasonable accommodation.
2. AU Community members may file a grievance with the ADA/504 Coordinator. AU Community members are encouraged to first attempt to resolve their concerns informally in the unit in which the accommodation request is made.
3. If resolution efforts at the unit level fail or are impracticable, the AU Community member may use the Section 504/ADA Grievance Procedures.

G. Retaliation Prohibited

1. Retaliation against an individual for raising an access concern, requesting an accommodation, or participating in the grievance process is strictly prohibited.

H. Regulatory Agency Information

1. Additional information, including information about filing a complaint, may be directed to the District of Columbia Office of Human Rights, the U.S. Department of Education, Office for Civil Rights, or the U.S. Equal Employment Opportunity Commission.

V. EFFECTIVE DATE AND REVISIONS:

This Policy is effective as of June 1, 2026.