



Official Publication and Recordkeeping Note

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Access for Individuals with Disabilities Policy

Policy Number: 9.0

Policy Owner(s): Office of Counseling and Accessibility Services; Office of Human Resources

Responsible Office: Office of Counseling and Accessibility Services; Office of Human Resources

Supporting Office(s): n/a

Original Issue Date: ----

Last Revised Date: April 6, 2026

Effective Date: May 1, 2026

Approved By: University President

Covered Individuals: Faculty, Staff, Students, Applicants, Visitors

Approver's Signature (if President):

A handwritten signature in black ink, appearing to be the initials "ASZ" or similar, written in a cursive style.

I. POLICY STATEMENT

Clark Atlanta University ("CAU" or "the University") is committed to maintaining an inclusive and accessible environment for all individuals at CAU, particularly for all qualified individuals with disabilities. Ensuring that members of the CAU community, including individuals with disabilities or impairments, have equal access to facilities, information, and services associated with administration, education, and other University functions is important for CAU's fulfillment of its mission.

CAU complies with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), the Fair Housing Act (FHA), and Georgia Code § 34-6A-4, Prohibited Discriminatory Acts. These laws prohibit discrimination against qualified individuals with disabilities in employment and education programs.

It is the policy of CAU to provide reasonable accommodations in the form of modifications to its programs, practices, and structures in order to make the University's activities accessible to qualified individuals with known disabilities or impairments. Such modifications will only be limited or not provided if they would fundamentally alter the nature of the University's services or programs or impose an undue hardship on CAU.

In no case will CAU discriminate against or subject to discrimination, including intentional or unintentional exclusion or disability harassment, any individual based on disability, perceived disability, or association with an individual with a disability. CAU further prohibits retaliation against any individual for requesting an accommodation or utilizing this policy.

2. SCOPE



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This policy applies to the following individuals while they are on University-controlled property or engaged in University activities:

- Faculty and staff
- Students
- Applicants for employment or admission
- Visitors and program participants

3. LEGAL AND REGULATORY FRAMEWORK

This policy is guided by, and intended to comply with, applicable federal, state, and local laws and regulations, including but not limited to:

- Americans with Disabilities Act (ADA)
- Section 504 of the Rehabilitation Act of 1973
- Fair Housing Act (FHA)
- Georgia Code § 34-6A-4
- Applicable federal and state regulations and guidance

4. DEFINITIONS

- **Academic Adjustment.** An academic adjustment is any necessary modification or addition related to University curricula, a program of study, or a service that enables a student with a disability to receive an equal opportunity to benefit from educational processes and does not constitute a Fundamental Alteration. Academic adjustments may include appropriate auxiliary aids and services, as well as accessible alternative arrangements or modifications to academic requirements as necessary to ensure equal educational opportunity. For example, a necessary modification to an exam might change the place and manner in which the exam is administered to ensure accessibility for students with disabilities. Examples of other adjustments are: arranging for priority registration; reducing a course load; substituting one course for another; providing recording devices, sign language interpreters, or extended time for testing or projects; and equipping school computers with screen-reading, voice recognition, or other adaptive software or hardware. An academic adjustment at the collegiate level does not typically include: attendants; individually prescribed devices; readers for personal use or study; or other devices or services of a personal nature.
- **Accommodation.** See “Reasonable Accommodations” below.
- **Accommodation Plan.** An accommodation plan is a document that outlines the specific modifications in the work or academic environment an organization will provide to enable an individual with a disability to perform essential functions or to participate in work, academic, and



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related activities. In an institution of higher education such documents, particularly for students, may also be referred to as **“Letters of Accommodation.”**

- **Disability.** As defined by the ADA, a disability is a physical or mental impairment that substantially limits one or more major life activities. A disability also includes having a history or record of such an impairment or being perceived by others as having such an impairment.
- **Disability Harassment.** Disability harassment is negative attitudes/actions towards an individual with a disability, including teasing/bullying, or singling out such individuals because of their disabilities.
- **Disability Services Professional.** A disability service professional is a physician, therapist, psychologist, psychiatrist, or other medical professional qualified by appropriate professional credentials, education, and experience to give a diagnosis related to a disability.
- **Fundamental Alteration.** A fundamental alteration is a change to a University service, program, or activity that significantly changes the essential function of that service, program or activity.
- **Major Life Activities.** Major life activities are those functions that are important to most people’s daily lives. Examples of major life activities are: breathing, walking, talking, hearing, seeing, sleeping, caring for oneself, performing manual tasks, and working. Major life activities also include major bodily functions such as immune system functions, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. A physical or mental impairment may substantially limit one or more of these activities.
- **Qualified Individual with a Disability.** These individuals are:
 - **Students** who have a physical or mental impairment related to one or more major life activities, or have a record of such impairment, or are regarded as having such impairment, who meet the academic and technical standards requisite for admission to or participation in the institution's educational programs with or without reasonable accommodation.
 - **Employees** who have a physical or mental impairment related to one or more major life activities, or have a record of such impairment, or are regarded as having such impairment, who have the skills, experience, education, and other requirements necessary for the job and can perform the essential functions of the position with or without reasonable accommodations.
- **Reasonable Accommodations.** Reasonable accommodations in the academic or work environment are any modifications or adjustments to that environment that will enable an individual with a disability to perform essential functions or to participate in work, academic, and related activities. Reasonable accommodations also include adjustments to assure that an



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individual with a disability has rights and privileges equal to those of individuals without disabilities.

- **Retaliation.** Retaliation as defined by the Equal Employment Opportunity Commission is any materially adverse action taken by an employer, manager, or supervisor at CAU against an individual for engaging in "protected activity" under ADA such as requesting a reasonable accommodation or complaining about disability discrimination or supporting a complaint regarding disability discrimination.
- **Undue Hardship.** An undue hardship is any action requiring significant difficulty for or expense to CAU when considered in light of a number of factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the University's operations.

5. POLICY REQUIREMENTS

5.1 Reasonable Accommodations and Academic Adjustments

CAU provides reasonable accommodations and academic adjustments to qualified individuals with disabilities in order to ensure equal access to educational programs, employment, services, and activities. Reasonable accommodations and academic adjustments may include appropriate auxiliary aids and services, accessible alternative arrangements, or modifications to academic or workplace requirements necessary to ensure equal opportunity.

CAU will not:

- Lower or substantially modify essential program or job requirements
- Change the substantive content of academic curricula
- Provide personal attendants, personal devices, or services of a personal nature
- Approve accommodations that impose undue hardship or fundamental alteration

5.2 Non-Retaliation

CAU prohibits retaliation against any individual for requesting or receiving an accommodation, filing a complaint of disability discrimination, or supporting another individual's use of this policy. Retaliation includes any materially adverse action taken because an individual engaged in activity protected under the ADA or this policy.

5.3 Confidentiality

CAU respects the confidential and private nature of medical, disability, and accommodation-related information. Such information will be treated as confidential and shared only with University officials who have a legitimate need to know in order to administer or implement accommodations or comply



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with legal obligations. All University personnel with access to such information are expected to maintain the utmost confidentiality regarding accommodation requests and reasons for the implementation of such accommodations if approved.

6. PROCEDURES AND GUIDELINES

6.1 Requesting Accommodations

- **Students.** Students seeking accommodations must submit a request to the Office of Counseling and Accessibility Services (OCAS), provide appropriate medical or professional documentation completed by a qualified Disability Services Professional, and written authorization permitting OCAS to communicate with that professional. IEPs or 504 Plans from elementary or secondary education may be considered but are not determinative at the postsecondary level.
- **Employees.** Employees seeking accommodations must submit a request to the Office of Human Resources, provide required medical documentation completed by a qualified Disability Services Professional, along with written authorization permitting HR to communicate with that professional.

6.2 Medical and Supporting Documentation Standards

Medical and related required documentation accompanying the accommodation request submitted by a student or an employee **must** be in the following format and provide the following information:

- Be completed by a Disability Services Professional (i.e., physician, therapist, psychologist, psychiatrist, or other qualified medical professional)
- Be submitted on the official letterhead of the Disability Services Professional
- Be signed and dated within the last three (3) years
- Establish the Disability Services Professional's credentials and qualifications
- A specific diagnosis of the individual's current physical or mental condition
- A summary of recent evaluations
- The expected duration of the condition
- Functional limitations resulting from the impairment
- The necessity of the requested accommodation(s)

Documentation may also address:

- Severity and duration of the impairment
- Current impact on academic, work, or living activities
- Suggested modifications or environmental adjustments



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The University is not required to pay for documentation. CAU may, at its discretion, conduct an independent assessment at its own expense.

6.3 Eligibility Review and Determination

CAU engages in an interactive, individualized, case-by-case review process with each individual who applies for a reasonable accommodation. The purpose of this process is to determine whether the individual's physical or mental impairment qualifies as a disability under applicable law and, if so, whether the requested accommodation can be reasonably provided without imposing an undue hardship or fundamentally altering a University program, service, or activity. The University may select from among various effective approaches to accommodation and is not required to provide the specific accommodation requested if an alternative accommodation is equally effective. Temporary accommodations may be provided in 30-day increments for temporary conditions.

6.3.1 Students

OCAS is responsible for reviewing student accommodation requests and supporting documentation. In reviewing requests, OCAS follows guidance from the Association on Higher Education and Disability (AHEAD) and applicable legal standards.

A. Determination of Eligibility for Student Requests:

- i. In determining eligibility, OCAS evaluates whether the student has a physical or mental impairment that substantially limits one or more major life activities and the student is otherwise qualified to participate in the University's academic programs, with or without reasonable accommodation.
- ii. OCAS determines both whether the student is eligible for accommodations and the specific accommodations or academic adjustments that are approved. As part of this review, OCAS may, at its discretion, consult with one or more of the following: Academic departments or faculty representatives, University administrators and Legal or Compliance representatives.
- iii. Except in circumstances requiring additional review time, OCAS will provide a written eligibility determination to the student within thirty (30) days of the student's submission of a complete application for eligibility determination.

B. Letters of Accommodation and Academic Adjustment Implementation

- i. Once a positive eligibility determination has been made, OCAS prepares a Letter of Accommodation (also referred to as an Accommodation Plan) outlining the approved academic adjustments.
- ii. Key provisions governing Letters of Accommodation include:
 - Students must request academic adjustments each academic term, preferably within the first week of the term.



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- Academic adjustments approved for one term do not automatically carry forward to future terms.
 - Academic adjustments are not retroactive to any date prior to OCAS approval and notification to faculty.
 - Students who elect to request accommodations later in the term will not receive adjustments for coursework or assessments that occurred prior to approval.
- iii. OCAS will electronically issue the Letter of Accommodation to the student within three (3) days of receiving the student’s request for the term. The student must electronically sign the Letter within three (3) days of receipt.
 - iv. OCAS will issue the Letter of Accommodation to the student’s faculty members regardless of whether the student has electronically signed the document. Faculty members are responsible for implementing the approved accommodations immediately upon receipt and must return their signed acknowledgment to OCAS within three (3) days.
 - v. Students who later choose to refuse an approved academic adjustment or request withdrawal of their Letter of Accommodation must complete the appropriate consent documentation with OCAS or the faculty member, as applicable.
 - vi. Faculty are required to implement accommodations upon receipt.

C. Substantive Limitations on Academic Adjustments

- i. In providing academic adjustments, CAU will not:
 - Lower or substantially modify essential academic requirements
 - Change the substantive content of instructional materials, examinations, or curricula
 - Provide personal attendants, individually prescribed devices, or services of a personal nature.
- ii. CAU will not approve any academic adjustment that would:
 - Fundamentally alter the nature of a course, program, or activity; or
 - Result in an undue financial or administrative burden on the University, as defined in this policy.

6.3.2 Employees

HR is responsible for reviewing employee accommodation requests. HR conducts this review in coordination with the employee’s supervisor and, at its discretion, may involve University administrators or Legal/Compliance representatives.

A. Determination of Eligibility for Employee Requests:

- i. In making an eligibility determination, HR considers whether the employee has a physical or mental impairment that substantially limits one or more major life



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- activities; whether the employee is qualified for the position; and whether the employee can perform the essential functions of the position with or without reasonable accommodation.
- ii. The review process will result in one of the following determinations:
 - Identification and approval of a reasonable accommodation that serves the needs of both the employee and the University; or
 - A determination that a requested accommodation is not reasonable because it would impose an undue hardship or would not preserve the essential functions of the position.
- iii. Except in circumstances requiring additional review time, HR will provide a written determination to the employee within ninety (90) days of receiving a complete accommodation request.
- iv. Both the employee and the supervisor are required to sign the determination letter or denial within ten (10) days of issuance.

B. Employee Accommodation Plans

- i. For employees with a positive eligibility determination, HR will issue an Accommodation Plan outlining the approved workplace accommodations.
- ii. HR may require employees to:
 - Update accommodation requests on an annual basis; or
 - Provide updated documentation if circumstances change or if the accommodation requires reassessment

Any updated request will be evaluated using the same criteria applied to the initial determination and may result in modification, continuation, or termination of the accommodation.

6.4 Appeals

Students may appeal accommodation determinations to the highest Student Affairs/Life official within thirty (30) days of receipt of a written determination. In reviewing the appeal, the official may consult with representatives from relevant University offices. The official issues a final written decision, which is not subject to further appeal.

Employees may appeal accommodation determinations to the highest HR official within thirty (30) days of receipt of a written determination. In reviewing the appeal, the official may consult with representatives from relevant University offices. The official issues a final written decision, which is not subject to further appeal.

Applicants for employment may file complaints through HR consistent with established procedures.

7. ROLES AND RESPONSIBILITIES



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7.1 Office of Counseling and Accessibility Services

OCAS is responsible for:

- The intake and administering of student accommodation requests
- Reviewing student documentation and determining eligibility
- Conducting the interactive process to determine reasonable accommodations
- Issuing determinations and managing Letters of Accommodation
- Coordinating with faculty, academic units, and Legal/Compliance on the implementation of approved accommodations

7.2 Office of Human Resources

The Office of Human Resources is responsible for:

- The intake and administering employee accommodation requests
- Reviewing employee documentation and determining eligibility
- Conducting the interactive process to determine reasonable accommodations
- Issuing determinations and managing accommodation plans
- Monitoring compliance with employment laws.

7.3 Faculty, Supervisors, and Departments

Faculty and supervisors are responsible for:

- Implementing approved accommodations promptly
- Maintaining confidentiality
- Participating in the interactive process
- Refraining from discrimination or retaliation

7.4 Individual Responsibilities

Individuals requesting accommodations must:

- Disclose the need for accommodation in a timely manner
- Provide required documentation
- Communicate with faculty or supervisors regarding implementation
- Understand that accommodations are not retroactive

8. RELATED RESOURCES

- Human Resources Website



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9. REVISION HISTORY

Date	Description
June , 2023	Original Issue Date
April 6, 2026	Revised
