
COLUMBUS STATE UNIVERSITY

Policy Name:	ADA Reasonable Accommodation Policy
Policy Owner:	Chief Human Resources Officer
Responsible University Office:	Human Resources Office
Approval Date:	November 24, 2025
Effective Date:	November 24, 2025
Related Policies:	<u>University System of Georgia Human Resource Administrative Practice Manual, Employment Americans with Disabilities Act</u> <u>U.S. Equal Employment Opportunity Commission Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA</u> <u>U.S. Department of Labor Office of Disability Employment Policy</u>

I. POLICY PURPOSE STATEMENT

This policy informs Columbus State University (CSU) employees and job applicants that the University complies with the Americans with Disabilities Act (ADA), as amended by the Americans with Disabilities Act Amendments Act of 2008 (ADAAA). This policy outlines procedures to assist job applicants and CSU employees, including faculty, staff, and student employees, with requesting reasonable accommodations.

II. BACKGROUND

The ADA, as amended by the ADAAA, prohibits workplace discrimination based on disability and requires employers to provide reasonable accommodations to qualified individuals with disabilities unless doing so would cause an undue hardship. CSU’s Non-Discrimination Policy also prohibits discrimination on the basis of disability. Unless providing a reasonable accommodation would create undue hardship, CSU must provide an accommodation that enables a qualified applicant or employee to perform the essential functions of the position.

III. SCOPE (WHO IS AFFECTED)

All CSU employees, including faculty, staff, and student employees, and all applicants for employment.

IV. DEFINITIONS AND ACRONYMS

- **Applicant:** An individual pursuing an employment opportunity with the University by submitting a completed application for a specific, vacant position.
- **Employee:** Any faculty member, staff member, or student employed by CSU, including hourly, salary, part-time, and full-time employees.
- **Essential Function(s):** The ADA generally defines essential functions to mean the fundamental job duties of the position the individual with a disability holds or desires. This term does not include the marginal functions of the position. A job function may be considered essential because for any of several reasons, including, but not limited to, the following: (1) the function may be essential because the reason the position exists is to perform that function; (2) the function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed; and/or (3) the job function is highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.
- **Disability:** Defined by the ADA as a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
- **Human Resources (HR):** CSU Office of Human Resources.
- **Major Life Activities:** Identified by the ADA to include, but not limited as, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, and the operation of major bodily functions.
- **Major Bodily Functions:** Identified by the ADA to include, 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:** A modification or adjustment to the job application process, or the work environment, that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions.
- **Substantial Limitation (Substantially Limiting):** Defined by the ADA as the inability of an individual to perform a major life activity as compared to most people in the general population.

An impairment that substantially limits one major life activity need not limit other major life activities in order to be considered a disability.

An impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active.

The determination of whether an impairment substantially limits a major life activity shall be made without regard to the ameliorative effects of mitigating measures such as medication, medical supplies, equipment or appliances, low-vision devices (which do not include ordinary eyeglasses or contact lenses),

prosthetics, including limbs and devices, hearing aids and cochlear implants or other implantable hearing devices, mobility devices, or oxygen therapy equipment and supplies; use of assistive technology; reasonable accommodation or auxiliary aides or services; or learned behavioral or adaptive neurological modifications.

- **Qualified Individual with a Disability:** An individual with a disability (*see definition above*) is qualified if he or she possesses the requisite skills, education, experience, and other job-related requirements of the position the individual holds or desires and, with or without reasonable accommodation, can perform the essential functions of such position. An applicant must satisfy the minimum qualifications for the job for which he or she is applying in order to be considered qualified.
- **Undue Hardship:** The ADA defines undue hardship as significant difficulty or expense incurred by an employer, with respect to the provision of accommodation. Hardship also refers to an accommodation that is unduly extensive, substantial, or disruptive; or one that would fundamentally alter the nature of the position or operation of the business. Factors considered in determining whether accommodation is an undue hardship may include cost of the accommodation, size of the employer, financial resources, and the nature and structure of the operation.

V. POLICY

Columbus State University will provide reasonable accommodations to qualified individuals with disabilities so they can perform essential job functions unless doing so creates an undue hardship for the University or the accommodation creates a direct threat to the health or safety of the individual or others and the threat cannot be eliminated through reasonable accommodation.

VI. ASSOCIATED POLICIES/REGULATIONS

- University System of Georgia *Human Resource Administrative Practice Manual*, Employment
- Americans with Disabilities Act
- U.S. Equal Employment Opportunity Commission Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA
- U.S. Department of Labor Office of Disability Employment Policy

VII. PROCEDURES ASSOCIATED WITH THIS POLICY

A. Requesting an Accommodation: Applicants

- Applicants who need an accommodation during any part of the hiring or selection process should contact the Office of Human Resources at hr@columbusstate.edu or [706-507-8920](tel:706-507-8920) as soon as possible to ensure timely coordination of reasonable accommodations.

B. Requesting an Accommodation: Employees

- Employees seeking a reasonable accommodation should follow CSU's ADA Accommodation Process and Procedures.
- The ADA Accommodation Process and Procedures is available on the Human Resources website or may be requested by contacting HR directly.
- Human Resources is responsible for administering the ADA Reasonable Accommodation process, including determining eligibility, initiating the interactive process, assessing undue hardship or direct threat issues, and issuing determinations (approval, denial, or amendment).
- Employees may not always receive their preferred accommodation; however, CSU will provide an effective accommodation that enables the employee to perform the essential job functions. Determinations are made on a case-by-case basis consistent with the ADA, USG policies, and CSU policy.

VIII. APPEALS

Employees may appeal a denial or amendment of an accommodation by submitting a written request to the University's Chief Human Resources Officer (CHRO) within 15 calendar days of receiving the determination. The CHRO will review the decision for compliance with CSU's ADA policy, process, and procedures. The CHRO's decision is final.

IX. CONFIDENTIALITY

Only designated Human Resources or Legal Affairs employees will have access to confidential medical information provided during the accommodation process. While supervisors may be informed of an employee's functional limitations or necessary work-related restrictions, they will not receive medical diagnosis or documentation.

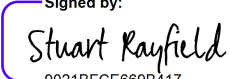
Confidential medical information will be disclosed only as permitted by law, which may include:

- informing supervisors of necessary restrictions or accommodations;
- informing first-aid or safety personnel if a disability may require emergency treatment;
- providing information required for compliance reviews or audits.

Human Resources may contact an employee's healthcare provider, with the employee's signed authorization, to obtain information necessary to evaluate an accommodation request.

X. VIOLATIONS

Employees, supervisors, or administrators who violate this policy (including failure to participate in the interactive process, failure to provide approved accommodations, unauthorized disclosure of confidential information, or retaliation) may be subject to corrective action up to and including termination.

APPROVED:  Signed by:
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