



Americans with Disabilities Act (ADA) Compliance Program

Office of Civil Rights Investigations and Compliance

October 2023

About the Program

The ADA Compliance program facilitates the inclusion of people with disabilities in all education, employment, healthcare, and research services provided by OHSU. The program is housed in the Office of Civil Rights Investigations and Compliance (OCIC) and is managed by the ADA Coordinator.

Through the program, the ADA Coordinator is charged with coordinating and monitoring OHSU's compliance with all federal and state laws, regulations, and other mandatory requirements related to people with disabilities.

The Coordinator also upholds a culture of accessibility and inclusion at OHSU in close collaboration with organizational partners, including the Center of Diversity and Inclusion (CDI), the Office of Student Access (OSA), the Office of Employee Accommodations (OEA), and the Patient Relations Office.

Program Mission

To embed organizational best practices for disability access, inclusion, and anti-discrimination across all OHSU missions through strong compliance with civil rights regulations and proactive use of universal design principles.

Universal Design

The design of products, programs, buildings, and environments that are accessible for people regardless of age, disability, or other factors.

Among other qualities, universally designed systems or products should support equitable access, be flexible and adaptable to meet a range of needs, be simple and intuitive to use, and be easily understood.

Program Values

The ADA Compliance program centers the four core values of OHSU – quality, transparency, service excellence, and diversity – through the lens of disability inclusion.

Quality

OHSU strives to be a standard bearer for quality and is committed to pursuing excellence in its mission areas and integrity in behavior. The ADA Compliance program reflects this commitment by supporting OHSU in its aspiration to be a disability-inclusive organization and achieving full compliance with disability regulations.

Transparency

Understanding that there is no trust without transparency, the ADA Compliance program aims to be both transparent and accountable regarding its purpose, objectives, and activities. This includes a commitment to recognizing the times when the program succeeds in meeting its goals and the times when it falls short, and using feedback and input from stakeholders to continually strive for program improvement.

Service Excellence

Remembering that OHSU's reputation is made and remade every day one encounter at a time, the ADA Compliance program aspires to support OHSU in adopting a people-centered approach to organizational policies and processes that impact students, employees, patients, and visitors. This includes empowering OHSU community members with an understanding of how to apply trauma-informed principles¹ when engaging people with disabilities, such as supporting physical and psychological safety, transparency in decision-making, managing power dynamics, and mitigating implicit bias.

Diversity

Disability is a critical component of diversity, and OHSU aims to build a diverse, equitable environment where all can thrive and excel. The successful inclusion of people with disabilities is the foundation on which the ADA Compliance program is built upon. The program also aims to center the intersection of disability with other lived experiences (e.g., race, ethnicity, gender identity, sexual orientation, socioeconomic status, veteran status) and honor people with intersectional identities who often have unique histories, traumas, and barriers related to research, education and healthcare.

¹ Additional information on trauma-informed systems change at OHSU can be found here: <https://o2.ohsu.edu/covington-response/trauma-informed-systems-change>

Legal and Policy Framework

The ADA Compliance program supports and monitors OHSU’s compliance with all federal and state regulations related to civil rights, access, and anti-discrimination for people with disabilities. Below is an overview of essential laws, policies, and standards that guide the ADA Compliance program’s work.

Category	Applicable Regulations
Federal Laws	Americans with Disabilities Act of 1990 , as amended Rehabilitation Act of 1973, Section 504 and Section 508 Patient Protection and Affordable Care Act, Section 1557
State Laws	ORS 182.109 ORS 353.210 ORS 410.710 ORS 441.049 ORS 535.210 ORS 659A.103 through 659A.136 ORS 659A.142 ORS 659A.143
OHSU Policies	<p>OHSU Students Equal Access for Students with Disabilities (02-01-002) Technical Standards (02-70-010) Change in Scheduled Exam and other Assessments (02-70-045) Exam Proctoring (02-70-050) Discrimination, Harassment and Retaliation Policy (03-05-048) Service Animals (07-90-060)</p> <p>OHSU Employees Employee Rights and Responsibilities Affirmative Action Goals (03-05-025) Discrimination, Harassment and Retaliation Policy (03-05-048) Accommodations Policy (03-05-055) Service Animals (07-90-060)</p> <p>OHSU Community Code of Conduct – <i>under revision</i> Access for Members of the Public to OHSU Programs, Services, and Activities (08-01-005) Physical Access Committee Policy (08-01-006) Accessibility of Digital Information Policy (08-01-010) OHSU Social Media (08-10-015)</p> <p>OHSU Patients Patient Rights and Responsibilities (HC-PRM-108-POL) Patient Visitation Policy (HC-PRM-109-POL) Interpreters (HC-PRM-125-POL) Support Persons for Patients with Disabilities (HC-PRM-140-POL) Patients Reasonable Accommodation Policy (HC-PRM-146-POL) Service Animals (HC-PRM-100-DOC) Auxiliary Aids and Services – <i>pending</i></p>
OHSU Standards	Respect for All Inclusive Language Guide Accessibility Resource Center – <i>Sakai</i>

Program Areas of Work

Physical Accessibility

Coordinate OHSU compliance with laws and regulations pertaining to physical accessibility for people with disabilities, e.g., ADA Title II and Oregon state law requirements. This includes close partnership with the Physical Access Committee, Wayfinding Committee, and OHSU departments that support the physical environment, such as Facilities, Design & Construction, Campus Access and Commute Services, and Campus Planning & Real Estate.

Digital Accessibility

Coordinate OHSU compliance with laws and standards related to digital accessibility, e.g., Web Content Accessibility Guidelines (WCAG). This includes partnering with the Information Technology Group (ITG) and media stakeholders to ensure OHSU-produced websites, mobile apps, videos, podcasts, documents, and other digital outputs are usable and accessible by people with disabilities.

Access to OHSU Services

Promote disability access to all OHSU programs, services, and activities. This includes aligning OHSU practices with standards mandated by ADA Title II, e.g., effective communication standards and the use of auxiliary aids such as Augmented and Alternative Communication (AAC), plain language, captioning, and tactile aids. This also includes assisting OHSU community members in developing culturally informed practices to better serve students, employees, patients, and visitors with disabilities from diverse backgrounds.

Accommodation System Support

Strengthen OHSU's existing ADA and Section 504 accommodation systems through alignment of related policies, streamlined processes, and coordinated training and resource development for OHSU community members. As needed, this includes providing high-level guidance for stakeholders (e.g., OSA, OEA, Patient Relations, Visitor & Volunteer Services) regarding complex disability accommodations or recurring access needs at OHSU.

Disability Data

Use data analysis to monitor OHSU compliance with federal and state laws. Work with partners to establish consistent implementation of data collection and privacy standards for disability-related demographics, accommodations, and complaints, including guidance regarding aggregation and disaggregation of potentially identifying data.



ADA Compliance Objectives Fiscal Years 2024 - 2026

Four major ADA compliance objectives have been prioritized for the three-year fiscal period from July 2023 to June 2026, with an emphasis on supporting OHSU in achieving and maintaining baseline compliance with disability-related federal and state laws:

1. Reorient and Redevelop ADA Compliance Program
2. Facilitate Physical Access Efforts and Advocacy
3. Initiate Coordinated Effort to Improve Digital Access
4. Refine Existing Accommodation Systems

Related projects and activities for each objective are described in the following pages. This information is subject to change depending on factors such as legal updates that necessitate a shift in priorities or ongoing availability of resources. Some projects will be complex multi-year efforts and are likely to extend into fiscal year 2027 and beyond.

Objective 1: Reorient and Redevelop ADA Compliance Program

OHSU Accessibility Self-Evaluation

- Identify existing accessibility resources at OHSU, including programs, staffing, trainings, policies, processes, procedures, and statements.
- In partnership with OHSU program stakeholders, identify service gaps and opportunities for improved access for students, employees, patients, and visitors.
- Solicit feedback from people with disabilities on the accessibility of OHSU's programs, services, and activities.
- Compile findings into an updated OHSU Self-Evaluation document.
- Use gap analysis to prioritize projects based on timing, need, and impact.

Program Partnerships

- Build partnerships with OHSU stakeholders, e.g., employee resource groups, university representatives, and central services departments.
- Regularly gather feedback from program partners and use input to refine compliance projects and activities.
- Collaborate with stakeholders to coordinate organizational efforts on disability inclusion and accessibility, e.g., training plans or policy revisions.

Program Communications and Messaging

- Solidify and communicate ADA Compliance program's purpose.
- Update OCIC public webpage on the ADA Compliance program.
- Provide clear, updated guidance on the ADA Coordinator's role and responsibilities within the ADA accommodation system at OHSU.
- Provide annual updates on the work of the ADA Compliance program.

OHSU Disability Vision

- Convene representative group of stakeholders to collaborate on the development of a unified disability inclusion vision for OHSU.
- Develop and deliver training on creating an organizational vision.
- Gather and use input from OHSU community members to create a coordinated vision for disability inclusion at OHSU. Include identification of roles and responsibilities.

Objective 2: Facilitate Physical Access Efforts and Advocacy

Physical Access Committee

- Clarify committee purpose and mission.
- Update OHSU's policy to clarify roles, responsibilities, and accountability.
- Review membership requirements and strategically recruit new members.
- Reinstate and update the committee webpage.
- Develop and provide introductory training for new members on the committee's purpose, values, and processes.
- Conduct process improvement for triaging physical access barrier requests, e.g., updated barrier reporting form, clearer guidance on types of requests that can be made, updated tracking mechanism, updated decision matrix.
- Collaboratively develop, prioritize, and implement committee project list.
- Coordinate with OHSU partners such as the Design & Construction Department, the Wayfinding Committee, and the Ability Resource Group.
- Promote committee involvement and input in design phase for new building projects, e.g., OHSU Hospital Expansion Project.
- Work with members and other stakeholders to develop and implement accessibility standards for new construction.
- Draft and produce annual committee report.

Physical Access Roadmap

- Confirm funding mechanisms for ADA physical accessibility assessment of OHSU's facilities at Marquam Hill, South Waterfront, and the West Campus.
- Work with Facilities and other stakeholders to define scope of ADA physical accessibility assessment.
- Facilitate an RFP process to select a qualified contractor.
- Serve as main project contact for contractor throughout multi-year assessment.
- Use assessment findings to develop a Physical Accessibility Roadmap (also known as a transition plan) to describe the process and timeline for physical accessibility barrier removal.

Objective 3: Initiate Coordinated Effort to Improve Digital Access

Digital Access Committee

- Support ITG partners in defining the purpose and role of a new Digital Access Committee.
- Work with ITG partners to identify and recruit potential members.
- Collaboratively develop, prioritize, and implement projects with members.
- Discuss and define responsibility for Digital Access Reporting Barrier Form.

Digital Accessibility Resources

- Identify existing OHSU resources for digital access (e.g., Sakai) and how often resources are used effectively.
- Gather information on the accessibility of existing systemic software and platforms (e.g., Epic, MyChart, O2, Ethics Point) through VPATs and similar status reports.
- Identify and help register vendors who can offer remediation services for digital content such as accessible websites, PDFs, and Microsoft Office documents.

Digital Accessibility Processes and Practices

- Advocate for ADA review within OHSU software procurement process.
- In partnership with the Digital Access Committee and ITG, develop a digital accessibility resource webpage for OHSU members with disabilities (e.g., tips for navigating internal online platforms when using screen-readers).
- Partner with OSA to support faculty in producing accessible course materials to comply with Section 504 and ADA Title II requirements.
- Partner with media and ITG teams to integrate and/or confirm accessibility requirements for OHSU communications to the public and to employees.

Objective 4: Refine Existing Accommodation Systems

Accommodation Appeals Process

- Develop an accommodation appeals process for students and employees who would like to appeal a decision made about their disability, pregnancy, and/or religious accommodation request.
- Solicit feedback from legal advisors, OCIC, OSA, OEA, and other stakeholders on the appeals process.
- Finalize the appeals process into an OHSU policy.
- Update the OCIC website to provide guidance to students and employees seeking to appeal an accommodation decision.

Alignment of Accommodation Policies and Processes

- Review existing OHSU accommodation policies for students, employees, patients, and members of the public to identify potential opportunities for alignment and shared standards on documentation, record retention, privacy, and funding.
- Support consistent language, understanding, and use of ADA Flag feature for patient files in Epic software.
- Update process for ADA accommodations related to OHSU public events.
- As needed, propose updates to accommodation-related policies with relevant stakeholders and support strategic revision of policies.

Accommodation Funding and Procurement Model

- Determine current funding model for student, employee, and patient accommodations.
- In partnership with OHSU stakeholders, assess whether a centralized accommodation fund would be useful, and in which context(s) if so.
- If needed, develop a proposal for a centralized accommodation fund in partnership with OSA, OEA, and others.

Targeted Accommodation Trainings

- Review input and data collected by OSA, OEA, Patient Relations, Language Services, and others to identify potential areas of need for training.
- Support OSA, OEA, and Patient Relations in developing and delivering accommodations-related training for OHSU missions and departments.
 - Focus on frontline staff and managers/supervisors.
 - Review legal requirements and organization values; relevant policies, processes, funding available; documentation and privacy.

Project Opportunities for Fiscal Year 2027 and Beyond

These projects are potential future opportunities for the ADA Compliance program. While not top priority during the FY24-26 period, some projects below may be initiated or supported during this time as capacity allows.

- **Disability-Inclusive Recruitment and Selection Processes.** Partner with OEA and the Talent Acquisition Team to review recruitment, selection, and promotion processes to mitigate or remove potential barriers for people with disabilities. Support the development of a clear accommodation process for job applicants with disabilities.
- **Disability-Inclusive Safety and Emergency Planning.** Work with Public Safety and other campus partners to review existing safety and emergency preparedness plans through a disability lens.
- **Enhanced Maps and Wayfinding.** Support the Wayfinding Committee and partners in developing safe, trustworthy text directions and visual maps for patients and visitors with vision, physical, and cognitive disabilities, using models such as those from the [University of Montana](#). Support Visitor & Volunteer Services department in marketing its volunteer hospitality program to offer wayfinding services to patients and visitors with disabilities. Explore the use of other accessibility tools such as tactile maps or indoor wayfinding mobile apps.
- **Disability Allyship / Anti-Ableism Training.** Partner with CDI and the disability employee resource group to develop and deliver disability allyship and anti-ableism training for healthcare providers. Emphasize historical context, biases, and barriers to healthcare, and offer practical guidance for providers on how to mitigate and remove barriers.
- **OHSU Census.** Partner with OEA and others to conduct campus-wide census to offer voluntary opportunity for employees to update or share demographic status. Includes substantive educational campaign to explain definition of “disability,” robust communication plan, and transparency as to how data is stored, accessed, and used. Collaborate with employee resource groups to secure intersectional support and buy-in.
- **University Disability Competency Requirement.** At least one elective disability-related course is currently offered by the OHSU University Center for Excellence in Developmental Disabilities (UCEDD), but there is potential for expansion of course options related to disability in healthcare. Section 5307 of the Patient Protection and Affordable Care Act provides legislative authority for the Secretary of Health & Human Services to fund the development and to disseminate model curricula for cultural competency, prevention, public health proficiency, reducing health disparities, and

aptitude for working with individuals with disabilities training for use in health professions schools and continuing education programs. Section 5307 does not, however, mandate adoption and implementation of such curricula. This is an opportunity for OHSU to be a leader in adopting and implementing disability-inclusive health care curricula.

- **Expanded Disability Resources for OHSU Community.** For example, coordinating strategic trainings on supporting specific communities (e.g., neurodiversity, deafness, intellectual and developmental disabilities), or developing a public resource webpage for patients and visitors with disabilities in partnership with Patient Relations.
- **Exploration of Disability-Inclusive Healthcare Services for Potential Application at OHSU.** For example, connecting with counterparts to learn more about the [Deaf Access Program](#) at Mt. Sinai Hospital in Chicago and the [Center for Women with Disabilities](#) at the University of Pittsburgh Medical Center, as well as potential community partnerships with organizations such as the [Oregon Spinal Cord Injury Connection](#).