



## EVENT ACCESSIBILITY AND REASONABLE ACCOMMODATION POLICY

### **PURPOSE:**

To articulate the requirements for making University of New Haven sponsored events and externally sponsored events occurring on campus meaningfully accessible to individuals with disabilities.

### **BACKGROUND:**

The University of New Haven is required under federal and state disability laws to make its programs meaningfully accessible to individuals with disabilities. This policy is written in keeping with the spirit of federal and state laws to outline the University's process for campus events to honor and incorporate reasonable accommodations by the University. The ultimate goal is aimed at improving access to events, removing barriers to meaningful participation in events, and modify policies, practices or procedures related to scheduling and attending University sponsored or approved events as necessary to afford access, unless doing so would result in undue financial and administrative burdens or fundamentally alter the nature of the event or activity.

### **DEFINITIONS:**

**Title III Americans with Disabilities Act Amendments Act:** 12131–65. Title III prohibits discrimination on the basis of disability in the activities of places of public accommodation (businesses that are generally open to the public and that fall into one of 12 categories listed in the ADA, such as restaurants, movie theaters, schools, day care facilities, recreation facilities, and doctors' offices) and requires newly constructed or altered places of public accommodation—as well as commercial facilities (privately owned, nonresidential facilities such as factories, warehouses, or office buildings)—to comply with the ADA Standards. 42 U.S.C. 12181–89.

**Event:** a planned, organized public or social activity or program sponsored by the University of New Haven open to the University community and/or the public. Events include, but are not limited to, conferences, seminars, forums, colloquiums, receptions, athletic events, athletic camps, youth programs, gallery exhibits, theatre and music performances, and graduation ceremonies. Events sponsored by external entities that occur on campus are included within this definition. Excluded from this definition are events that occur outside of the United States of America that are not approved or sponsored by the University of New Haven and are not held on university owned or leased properties.

**Event Organizer:** the member of the University community, academic unit, department, student organization, other unit/group, or external entity organizing the event.

**Access:** the opportunity for individuals with disabilities to meaningfully participate in, utilize, benefit from and enjoy the facilities, programs, and services.

**Physical Accessibility:** the opportunity for individuals with disabilities to have equal physical access and engagement to participate within events/activities. A physically accessible space will include, but is not

limited to accessible parking, an accessible route from parking to the event, accessible entrances, accessible restrooms, elevators, ramps and/or lifts.

**POLICY APPLIES TO:**

This policy applies to all faculty, staff, students, visitors, guests, and external entities, on any property owned, leased, or managed by any entity or component of the University of New Haven.

**POLICY STATEMENT:**

Diversity, Equity and Inclusion are among the core values of the University of New Haven. Therefore, our goal is to create a campus climate that is inclusive of and accessible, and to proactively plan events free of physical, communication and/or other barriers so all individuals may meaningfully participate in campus activities and events.

**Required Access Event Notification:**

All institutional and departmental publications that describe or invite public participation or attendance in programs at the University, and all University-sponsored events held off campus, are required to contain an Accessibility Statement (See examples or use the statement below):

*"Individuals with disabilities are encouraged to attend University of New Haven sponsored events. If you require a reasonable accommodation in order to participate in this event, please contact \_\_\_\_\_ [insert: the sponsoring department or contact person] by \_\_\_\_\_, 20 \_\_\_\_ at [insert: telephone number, email, fax number]."*

***If an accommodation has already been secured, such as a closed captioning, sign language interpreter or specific equipment, note that as well. For example:***

- ***Closed Captioning is available for this event.***
- ***Frequency Modulation (FM) amplification systems are available.***
- ***Sign language interpreting will be provided at the April 15<sup>th</sup> performance.***

If space on the event publication does not permit the required event notification above, a shorter notification statement may be substituted (See examples or use the statement below):

*"If you require a reasonable accommodation in order to participate in this event, please contact \_\_\_\_\_ [insert: the sponsoring department or contact person] by \_\_\_\_\_ 20 \_\_\_\_ at [insert: telephone number, email, fax number]."*

**Event Accommodation:**

The event organizer is responsible for making the event meaningfully accessible and providing requested reasonable accommodations, which includes paying for any associated expense of an accommodation. No accommodation shall be required if the accommodation would fundamentally alter the nature of the event or result in undue financial or administrative burdens. Prior to denying an accommodation request, event planners must consult the Director of the Accessibility Resources Center

or the University's 504/ADA Coordinator. The Director/ University ADA Coordinator must approve denial of an accommodation request. The Director of Accessibility Resources Center can be reached by phone (203) 932-7331 or by email at [lcopneyokeke@newhaven.edu](mailto:lcopneyokeke@newhaven.edu). The University's 504/ADA Coordinator is Dr. Ophelie Allen-Rowe and she can be reached at (203) 932-7328 or by email at [orallen@newhaven.edu](mailto:orallen@newhaven.edu).

#### **External Entity:**

External entities are required to include the event notification identified in this policy or a similar notification in all publications that announce or invite public participation or attendance in an event held at University of New Haven facilities. External individuals, organizations or entities must provide written assurances to the University that their event held at a University of New Haven facility will be meaningfully accessible. The accessibility assurances may be contained in the written agreement for use/rental of University of New Haven facilities. Such agreements will require the external entity to ensure accessibility and provide reasonable accommodations.

#### **Health and Safety:**

This policy does not require an event organizer to permit an individual to participate in an event when that individual's participation poses a direct threat to the health or safety of others. It would be a rare occurrence for an individual's participation to pose a direct threat to the health or safety of others. In determining whether an individual poses a direct threat to the health or safety of others, the event organizer, in consultation with the Director of the Accessibility Resources Center or ADA Coordinator must make an individualized assessment to ascertain the nature and severity of the risk; the probability of potential injury; and whether reasonable modifications to the event or the provision of auxiliary aids or services will mitigate the risk.

#### **Event/Activity Space:**

The University will make every effort to schedule all events/activities in an accessible space per ***Appendix A: Checklist for Planning Accessible Events***. Student related events/activities will be given priority scheduling to ensure students with disabilities can participate in events/activities on campus. University-sponsored public events held on campus will occur in physically accessible spaces. University-sponsored events/activities off campus, or in a non-university facility will be held in facilities accessible to and useable by persons with disabilities as required by Title III of the Americans with Disabilities Act, unless the facility is an integral part of the event that cannot otherwise be accommodated. Event organizers should also make every effort to assure accessibility for those activities open only to students, faculty and/or staff (i.e. the university community) when possible. If for any reason a university community event/activity is scheduled in a space that is not accessible, and the event/activity organizer receives a request for an accommodation from an individual with a disability, the event/activity organizer must work to find an alternate location that is accessible and/or assess alternative accommodations.

#### **Lodging:**

If lodging is coordinated through the event, an opportunity must be provided to request accommodations related to lodging.

When talking to hotels:

- Check with hotels to ensure they understand the level of their accessibility and have procedures for providing access to their facilities
- Determine an alternative plan for meeting rooms or facilities that are not accessible.

**Requesting Assistance from Accessibility Resources Center:**

The Accessibility Resources Center is available for consult if assistance is needed with accessibility considerations or appropriate accommodations when planning an event or activity. The Accessibility Resources Center will work with the activity/event organizer and requester to determine the most appropriate and available accommodations whenever possible. ARC can be reached at (203) 932-7332 or [ARC@newhaven.edu](mailto:ARC@newhaven.edu) if assistance is needed.

**NOTE: It is not necessary to include considerations for accessibility regarding routine or standing meetings for established small groups of individuals prior to date this policy is enacted, when it is known that none of the individuals needs an accommodation. If membership in the committee changes, then accessibility of the new members should be addressed per this policy.**

Approved by Facilities Planning Committee April 7, 2022

## **Appendix A**

### **Checklist for Planning Accessible Events**

#### **Accessible Advertising:**

- Is advertising information about the event accessible to a broad range of participants (visual – includes closed captioning if digital, auditory – accessible by a screen reader if digital)?
- Have funds been allocated in the budget to cover the cost of accommodations, if requested?
- All advertising, invitations, and brochures include an access statement that includes multiple forms of contact.

*Accommodation requests related to a disability should be made to (sponsoring department, contact person, phone number and email address). See Sample Statements Attached in Appendix B.*

**NOTE: It is not necessary to include an accessibility notice in communications regarding routine or standing meetings for small groups of individuals when none of the individuals needs an accommodation.**

#### **Enabling Accommodations/Universal Design Considerations:**

- Can participants request accommodations through a registration form or other mechanism?
- Is there a section on the RSVP form for attendees to specify if they have dietary restrictions/food allergies?
- If you are offering snacks or catering at the event, have you ensured that that foods meet a variety of diets including vegetarian, vegan, gluten-free?
- Have presenters been asked if they wish to request accommodations?
- Have presenters been informed of ways to make presentations accessible to your proposed audience?
- Have videos/films been sourced with open or closed captions provided? If not, have you ensured that closed or open captions can be made available?
- If the event is live, are assistive listening devices (ALD) available?
- Is the staff knowledgeable about communicating with people with various disabilities?
- Do all publications state that they are available in alternate formats?

#### **Ensuring Accessible Locations:**

**EMS** – Accessibility features of every bookable space is identified in EMS.

#### **Meeting rooms**

- Are meeting rooms on accessible route of travel (no stairs or has elevator access)?
- Is there a clear pathway through the room (at least 36" wide) and 5ft x 5ft area for safe turning radius?

- If there is a stage or elevated area, is it wheelchair accessible if needed for the presenter or participants?
- The acoustics in the room are good, and in rooms where audio will be amplified (microphones), are there assistive listening devices available for participants who are hard of hearing?
- Is there reserved seating available near the front for participants who are Deaf or hard of hearing?
- Does the room have movable seating to make room for a wheelchair?
- Is there plenty of space to maneuver around tables in the room?
- Is there adequate lighting for persons with low vision or if a sign language interpreter is needed?

### **Entrances and doors**

- Is at least one of the primary entrances to the building accessible (if there are stairs, there must also be a ramp or lift; The door has a lever style handle (not a knob) and is relatively light, if the door is not automatic or held open)?
- If the main entrance to the building is not accessible, is there signage indicating the location of an alternate accessible entrance?
- Is the main entrance to the room accessible? If not is there signage indicating the location of an alternate accessible entrance?

### **Parking and Pathways**

- Are there accessible parking spaces near the accessible entrance?
- Is there an accessible route from parking/drop-off to the entrance?
- Is there an accessible route from the building entrance to the room?
- Is there adequate lighting at nighttime in the parking areas?
- Are the parking areas paved?

### **Public Restrooms and Drinking Fountains**

- Are there accessible restrooms and drinking fountains located along an accessible route of travel and on the same floor as your meeting space?
- Is there appropriate signage indicating which restrooms are accessible and if not, does signage at non-accessible restrooms direct people to accessible restrooms?

## **Appendix B**

### **Sample Access Statements:**

***General statement for registration of event:*** The University of New Haven encourages all individuals to participate in its programs and activities. If you anticipate needing any type of accommodation or have questions about the access provided, please call [insert program/event contact] a week in advance of your participation or visit. "

***Sample standard statements for general campus event access:*** To request accommodations that will facilitate your full participation in this [event, activity, conference, etc.], please contact [insert program/event contact] at [insert program/event contact's email address] or [insert program/event contact's phone number] by [insert date, typically the day registration for the event closes]. To request an accommodation for this event, please contact [insert program/event contact] at [insert program/event contact's email address] or [insert program/event contact's phone number] by [insert date, typically at least one week in advance].

***General statement on catalogs, brochures, other publications:*** To request this information in an alternate format, please contact [insert departmental/event contact] at [departmental/event contact's email address] or [departmental/event contact phone number].

***Abbreviated statement (space constraints):*** All participants are welcome. For questions regarding access and accommodation, please contact [insert program/event contact] in advance of the program.