



**Empower Federal Credit Union Policy:
Americans with Disabilities Act (ADA)
Compliance Policy for Members**



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A. Purpose and Overview:

The purpose of this policy is to affirm Empower Federal Credit Union's commitment to compliance with the Americans with Disabilities Act (ADA) and to prevent members from inadvertently experiencing the inability to access the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations provided by the Credit Union. Specific delineation of the Credit Union's ADA obligations to its employees and applicants is separately set forth within the Credit Union's Employee Handbook.

B. Scope of Policy

This policy applies to all Empower Federal Credit Union facilities and member-facing technology and software.

C. Accessibility of Facilities and Services

All Empower Federal Credit Union facilities and services are expected to comply with the level of accessibility as set forth in the [ADA Standards for Accessible Design](#). Construction, modification, and maintenance of physical locations should always be performed in the context of compliance with this standard within the permissibility of federal, state, and local building codes and regulations. Likewise, all member-facing technology and software should follow the expectations set forth in the [Web Content Accessibility Guidelines \(WCAG\)](#).

Reasonable Accommodations and Modifications

1. To comply with the Americans with Disabilities Act (ADA) the credit union will make accommodations or modifications that are deemed reasonable where doing such is readily achievable.
 - a. **"Reasonable Accommodations"** means making adjustments for the known physical or mental limitations of a disabled person unless the credit union can demonstrate that such adjustments are "unreasonable" or impose an "undue burden."
 - (i) "Undue burden" means that making the adjustment presents "significant difficulty or expense." Whether an adjustment entails significant difficulty or expense is tied to the concept of changes that are readily achievable.
 - b. **"Readily Achievable"** means an adjustment is "easily accomplished" and can be carried out without much difficulty or expense. Factors considered in determining whether an adjustment is readily achievable may include, but are not limited to the following:
 - (i) Nature and cost of the accommodation.



- (ii) Financial resources of the credit union.
 - (iii) Number of employees with the credit union.
 - (iv) Operations, composition, structure, and functions of the credit union's workforce.
- c. "Reasonable Modifications"** means that a change in a policy, practice, or procedure is done to offer equal access and equal opportunity for a person with a disability. Examples of "Reasonable Modifications" may include, but are not limited to the following:
- (i) Service Animals (defined as a dog that is individually trained to do work or perform tasks for a person with a disability) are permitted to accompany disabled individuals and are welcome at our Credit Union. Service animals should always remain with their owners.
 - (ii) Accessible Parking will be available at our Credit Union facilities.