

ADA Title I: Then and Now – How Have Things Changed

A high-level overview

Overview

- Purpose of ADA Title I
- Who it covers
- Key protections for applicants and employees
- General perspective: Then vs. Now

ADA Title I: Then

- Established in 1990 as part of the Americans with Disabilities Act
- Focused on preventing discrimination against qualified individuals with disabilities
- Initial challenges with compliance and awareness
- Limited employer understanding of accommodations
 - 2008 ADA Amendments Act (ADAAA) broadened definition of disability

ADA Title I: Now

- Greater awareness of disability inclusion
- Improved accommodation processes
- More robust training and policy development
- Growing emphasis on interactive processes
 - Modern rulings (e.g., Stanley v. City of Sanford, 2025) refine who is protected

Key Changes Over Time

- Broader interpretation of what qualifies as a disability
- More consistent accommodation standards
- Stronger enforcement and accountability
- Increasing focus on workplace accessibility and culture
 - Updated EEOC/DOJ guidance and regulatory refinements

Employer Responsibilities

- Provide reasonable accommodations
- Engage in the interactive process
- Avoid discrimination in hiring, promotion, and employment actions
- Maintain medical privacy and confidentiality

Employee Rights

- Right to request reasonable accommodations
- Protection from discrimination based on disability
- Right to confidentiality
- Right to equal opportunity in employment

Best Practices

- Document the interactive process
- Train managers and supervisors
- Standardize accommodation procedures
- Promote a culture of inclusion

Conclusion

- ADA Title I has evolved significantly since 1990
- Shift from basic compliance to proactive inclusion
- HR plays a central role in supporting employees
- Ongoing commitment improves workplace equity

ADAAA Impacts (2008)

- Expanded definition of disability
 - Greater coverage of physical and mental impairments
 - Redefined major life activities
 - Reduced burden on employees to prove disability

Supreme Court: Stanley v. City of Sanford (2025)

- Clarified ADA Title I applies only to current workers or job seekers
 - Retirees are not covered for post-employment benefits issues
 - Reinforces the need to define “qualified individual” clearly

EEOC & DOJ Updates

- Periodic updates to ADA Title I guidance
 - 2025 DOJ withdrawal of legacy ADA guidance docs
 - Increasing focus on AI-driven hiring and impact on protected groups

Modern Implications

- Policies must reflect ADAAA and new legal rulings
 - Documented interactive processes are critical
 - Training must address evolving case law and AI considerations

Case Review

Beasley v. O'Reilly Auto Parts (2023)

- Eleventh Circuit ruling
- Refusal to accommodate alone is not enough—must show adverse employment action
- Creates circuit split with other jurisdictions

Montague v. USPS (2023)

- Fifth Circuit decision
- Remote work/commuter assistance can be reasonable accommodation
- Focus on essential job functions

EEOC v. Charter Communications (Marlo Spaeth, 2023)

- Seventh Circuit decision
- Employee with vision impairment sought safer commute schedule
- Court emphasized broad view of reasonable accommodations

EEOC v. Walmart (2024)

- EEOC enforcement case
- Walmart removed medically necessary cart accommodation
- Resulted in settlement, training requirements, policy updates

Questions?

Thank you!