Methods Addendum

The AI Disability Standard: Specification of the Three Questions and the National Acknowledgment

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1. Purpose

This addendum accompanies *The AIDA Act: A Legislative Framework for a National AI Disability Standard* (Document 3). It specifies what the Act would fix in law, which is the three questions, the recognition rule, and the privacy rule. It also sets out the docket of questions the Act would send to rulemaking. The addendum carries the full register of objections to the proposal as well, because a specification that hides its dissent cannot be reviewed.

The relationship between the Act and the Standard is the relationship between a statute and the system it directs. The AIDA Act is the bill, and the AI Disability Standard is the three questions, the acknowledgment, and the recognition rule the bill would establish. Congress is not asked to decide any person's accommodation. Congress is asked to fix the questions and the form so that every institution works from the same ones.

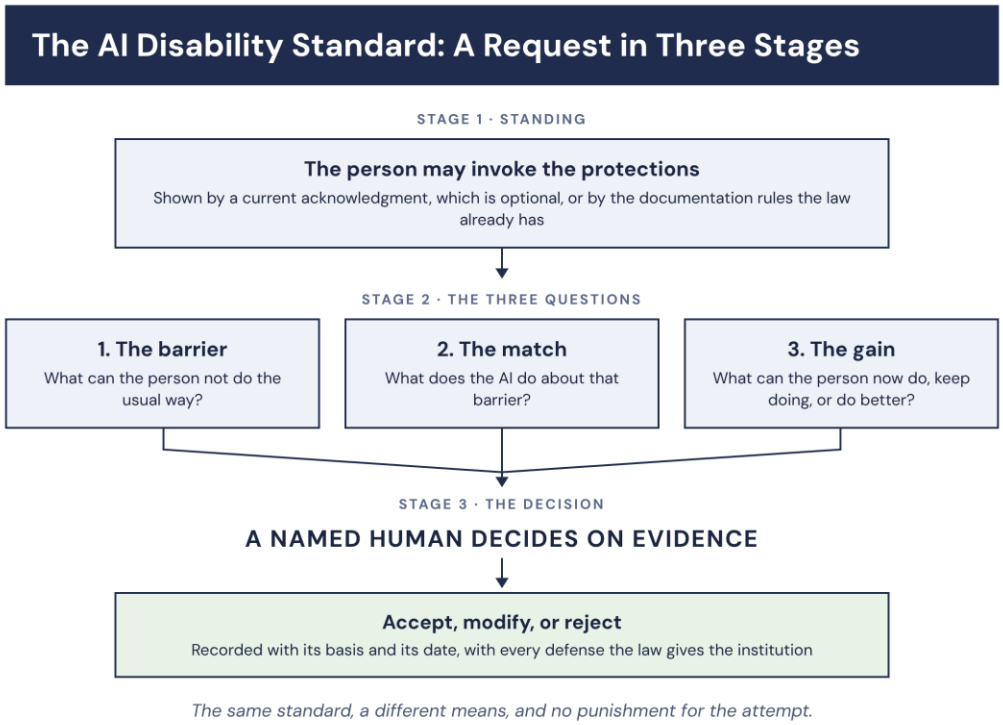


Figure 1. *A request moves through three stages, and the acknowledgment speaks to the first one only.*

1.1 Evidence discipline

This document separates what is established by others, what the author has built as working instruments, and what Congress is asked to do.

Tier	Contents	Language rule
Tier 1: Established by others	The statutes and regulations cited here are in force. The Assistive Technology Act defines an assistive device by its use. The ADA and Section 504 place accommodation and modification duties on covered recipients. The parking placard system operates under federal guidelines. Published research reports a trust and value penalty for disclosed AI use	Stated as established and cited to the primary source
Tier 2: Working instruments	The three-question functional test, the notice, the acknowledgment design, and the model clause. Each is published for review. The first paper works the test through seven cases it presents as hypothetical, and the third paper reports no outcome data on its notice	"Proposes," "would," and "is designed to." Never "proven" or "confirmed"
Tier 3: The ask	Set the three questions in law as a method for adoption. Direct a uniform system of acknowledgment with a privacy rule that binds, and choose a recognition model. Choose an issuer. Convene the rulemaking. Decide the Social Security question. Apply the Title I good-faith rule and offer other reasons to adopt	Framed as a request to Congress, with Phase 0 producing the first field data

1.2 Origin of the method

The Standard comes from three working papers published in 2026. The first asks when a use of AI is working as assistive technology (Puglisi, 2026a). The second asks what follows when an institution writes a rule against that use (Puglisi, 2026b). The third holds that the protections already exist and proposes a notice, an acknowledgment, and a record so that a person can invoke them (Puglisi, 2026c). The author drafted the papers with AI platforms as editor and researcher under his direction, with review rounds across multiple platforms, and decided every item.

2. The Three Questions, Specified

2.1 The root question

The three questions begin from the way federal law already defines the category. An assistive technology device is "any item, piece of equipment, or product system, whether acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with

disabilities" (29 U.S.C. § 3002(4)). The definition asks how the item is used and is silent on who made it. The root question for AI is therefore whether "the use fit a purpose that offsets a disability, physical or mental" (Puglisi, 2026c, Section 4.1).

The questions apply to every kind of disability, physical and mental. They set no single line and assign no score, because much of the range the Standard covers is gray area, and the law already asks for an individualized assessment in each case.

2.2 The three questions and the rule for each answer

Question	A sufficient answer names	An answer needs more when	Federal text behind it
1. The barrier. "A disability creates an identifiable functional barrier."	A function, such as "reading dense text, sustaining a keyboard session, holding sequence in working memory, or speaking in real time"	It states a diagnosis and no function	42 U.S.C. § 12102; 29 C.F.R. § 1630.2(j)
2. The match. "A particular AI capability directly reduces or bypasses that barrier."	The specific capability and the barrier it answers	It claims only that AI helps, or the AI supplies a capability no disability removed	29 U.S.C. § 3002(4)
3. The gain. "The intervention increases, maintains, or improves the person's functional capability."	What the person can now do, keep doing, or do better	No capability of the person is increased, maintained, or improved, or the output systematically changes meaning	29 U.S.C. § 3002(4)

The three questions are quoted from the first paper and would be adopted as written (Puglisi, 2026a, Section 6.1). The questions are neutral on the governance model. A tool with a human checkpoint qualifies, and so does an agent that carries out steps on the person's behalf, because "For some people the barrier is precisely the inability to perform the steps, and delegation to an agent is itself the accommodation" (Puglisi, 2026a, Section 6).

2.3 The four considerations

Consideration	Rule	Source
Sustain and cost	The question is whether the person can sustain the standard, and at what cost, never whether the person can perform the task once	Social Security Administration (n.d.-b); 29 C.F.R. § 1630.2(j)(4)(ii)
Comparator	Limitation is considered "as compared to most people in the general population"	29 C.F.R. § 1630.2(j)(1)(ii)

Consideration	Rule	Source
Domains	Physical function, and the four areas of mental functioning: understand, remember, or apply information; interact with others; concentrate, persist, or maintain pace; and adapt or manage oneself	Social Security Administration (n.d.-b)
Help already in use	Limitation is assessed without regard to the benefit of the tool. Good performance with the tool is evidence that the tool works	42 U.S.C. § 12102(4)(E)(i)

For the gray area the third paper proposes a working convention: the full working day is the reference point, and the case for the use grows with the distance between that day and what the person can sustain without the tool (Puglisi, 2026c, Section 4.1). The Social Security Administration describes sustained work as "a regular and continuing basis," meaning "8 hours a day, for 5 days a week, or an equivalent work schedule" (Social Security Administration, 1996). The Standard borrows that convention for sustained function and does not borrow the agency's eligibility level. How the gray area is considered is question 1 of the docket.

2.4 The functional chain

The first paper states the full chain the three questions follow:

Human capability → disability-related barrier → AI intervention → restored or expanded functional access → human action

The chain starts and ends with the person. A use in which the AI supplies the capability, and the person supplies none, breaks the chain at its first link.

2.5 What the three questions do not cover

The first paper works one case the three questions do not cover. A person with a documented disability asks AI to write a report on a subject the person has not studied and submits it unread. The use does not meet the second question, because the AI "answers the absence of subject knowledge, which no disability created," and it does not meet the third because no capability of the person is increased, maintained, or improved (Puglisi, 2026a, Section 6.3). That result rests on the use and passes no judgment on the person or the disability.

2.6 The separate governance screen

The first paper adds a two-part screen that asks who holds authority over consequential AI-mediated activity and whether the use produces an observable benefit. The screen does not decide assistive status:

"The screen is not a condition of assistive status, and a use that fails it is still assistive" (Puglisi, 2026a, Section 6.2). The Standard keeps the screen outside the three questions for that reason. The benefit "need not be proven in advance for every person, since a new accommodation is often tried before it is known to work" (Puglisi, 2026a, Section 6.2).

2.7 Seeing the gain

The first paper asks that research look at the human functional outcome, in the person, and not at a model's score (Puglisi, 2026a, Section 14). It lists outcomes to observe, which the optional pilot record in Section 8 would carry: independent task completion, reduction in physical effort, task initiation time, sustained productive periods, error reduction, successful communication, reduced dependence on another person, cognitive effort, the ability to change working position without losing the task, completion across interrupted sessions, user-reported autonomy, and retained decision authority.

3. The Record Specification

3.1 Four documents, each with one writer

Document	Who writes it	What it shows	What it never shows
The notice	The person	The three answers in the person's own words, the rule or action at issue, the protections that apply, the request, and the boundary the use keeps	The diagnosis
The certification, on the functional path	The person, with a clinician's diagnosis behind it	That the person certifies to what the Standard asks	The diagnosis, which the person keeps
The acknowledgment, where one exists	An issuer	An identification number, an expiration date, and the issuer's mark	A diagnosis or a disability symbol
The accommodation file	The recipient	The decision and its basis, as accept, modify, or reject by a named human	A detector flag or an impression recorded as a finding

3.2 Three layers of disclosure

"Disclosure runs in three layers, and the standard requires only the first" (Puglisi, 2026c, Section 4.4). The diagnosis is shown to the issuer at certification, and the acknowledgment shows the entitlement and nothing behind it. Past that point, disclosure is the person's choice, whether to an institution through the notice, to a reader, or to no one.

3.3 The decision and the flag

A decision on a request is recorded in the three terms Checkpoint-Based Governance supplies: accept, modify, or reject. The record names the human who decided, the basis, and the date. A detector score may be held as an unverified input, with the detector, its version, and the date. It is never held as a finding. The framework's canonical text explains why presence alone does not satisfy the rule: "Human in the loop means the person is present and participating. It does not require that the person holds authority or answers for the outcome" (Puglisi, n.d.).

3.4 The institution's minimum architecture

The second paper states the eight elements a disability-aware AI policy carries (Puglisi, 2026b, Section 16.1):

- an accommodation exception, or a cross-reference to the accommodation process
- individualized review
- documentation proportional to need
- approved secure alternatives
- confidential handling of accommodation information
- an appeal path
- separation of accommodation from ordinary AI enforcement
- human review before any adverse action based on detection or reports

The model clause puts the first element into policy language any institution can adopt:

> Nothing in this AI policy is intended to restrict the use of AI or AI-enabled functionality approved as a reasonable accommodation or other disability-related assistive technology. Requests for such use will be evaluated through the organization's applicable disability accommodation process, subject to legitimate requirements concerning essential functions, security, confidentiality, academic integrity, and fundamental alteration. (Puglisi, 2026b, Section 16.3)

The clause guarantees no request. "It guarantees that a request is treated as an accessibility question from the start" (Puglisi, 2026b, Section 16.3). Practice of this kind already exists at the Open University and at the United Kingdom's Department for Environment, Food and Rural Affairs (The Open University, 2025; Ede, 2026).

4. The Acknowledgment Specification

4.1 The face

Element	Specification	Model
Identification number	Present	23 C.F.R. § 1235.2
Expiration date	Present, with renewal	23 C.F.R. § 1235.4
Issuer's mark	Present	23 C.F.R. § 1235.2
Diagnosis	Never present	Placard face; TSA Notification Card
Disability symbol	Never present	The acknowledgment is read at arm's length by someone who knows the holder's name
Level or tier	Open. A visible tier would reveal how much the disability affects the person	Question 16 of the docket

Review of this package asked whether the face should also carry one line of scope, as the TSA card carries a line saying it exempts no one from screening. Any word added to the face is read at arm's length, so that question goes to the rulemaking beside question 16.

4.2 The two paths

Automatic. An SSDI award qualifies the person, and the path holds through the extended period of eligibility and extended Medicare coverage, as ABLE's does (ABLE National Resource Center, 2026). ABLE ties its route to a disability that began before age 46, and the Standard takes the route without the onset age (26 U.S.C. § 529A(e)). The rule governs the acknowledgment only, and the Social Security Administration's own rules on benefits are untouched.

Functional. The person certifies under penalty of perjury. The issuer sees the diagnosis at certification and keeps the certification, the functional domain, and the clinician's name and date. The person keeps the diagnosis and produces it only on request, as the ABLE account holder does under 26 C.F.R. § 1.529A-2(e)(1).

4.3 The range the Standard covers

The third paper holds that disability "runs from functional, to partial, to complete, and the standard covers the full range," and it offers a mapping "for public review, not a finding" (Puglisi, 2026c, Section 4.1). Readers of an earlier draft proposed three evidence pathways in its place: an administrative determination, a professional attestation, and a functional declaration. The specification carries both readings to the rulemaking and adopts neither.

4.4 Accessibility of the acknowledgment itself

A credential made for disabled people can be inaccessible to them. The European Disability Forum reported in August 2026 that the delegated act on the European Disability Card did not include its proposal for a tactile cue or a text alternative for the encoded data (European Disability Forum, 2026a). The acknowledgment's accessibility to its holder is therefore a specification requirement and a Phase 2 gate. Review of this package asked that the gate name at least one non-visual way for the holder to confirm the number, the expiration date, and the issuer's mark. It also asked that no step require a smartphone. Both points go to the Phase 2 specification.

5. The Recognition Rule, the Privacy Rule, and the Seven Conditions

5.1 The recognition rule and the privacy rule, with the source of each part

Part	Rule	Source in the series	Existing model
Optional	No one needs an acknowledgment to request an accommodation, and no recipient may demand one	Puglisi (2026c), Sections 4 and 7	The service-animal rule, which forbids a demand for documentation
Sufficient on standing	An adopting recipient accepts a current acknowledgment as evidence of standing without opening a medical file	Puglisi (2026c), Section 4	ABLE and vocational rehabilitation accept an SSDI award
Reciprocal	Every adopting recipient recognizes an acknowledgment from any authorized issuer	Puglisi (2026c), Section 4.4	23 C.F.R. § 1235.8
Private	Private presentation is the standard, and a public statement of the accommodation is the exception the institution must justify	Puglisi (2026c), Section 7	The ADA's separate confidential file
No inference	An acknowledgment is not evidence of capacity for work within the Standard	Puglisi (2026c), Sections 4.3 and 4.8	26 C.F.R. § 1.529A-2(e)(5)
Dated	The acknowledgment expires and renews, with a temporary tier	Puglisi (2026c), Section 4.4	23 C.F.R. §§ 1235.4, 1235.5
Privacy	The issuer keeps a minimum record, the recipient keeps a separate confidential file, use is limited to the accommodation decision, and no public label is compelled	Puglisi (2026c), Sections 3.1, 4.1, and 7	HIPAA's minimum necessary standard as the model, and 29 C.F.R. § 1630.14(c)(1)

The no-inference rule has a stated limit. It binds the issuer and the recipients who adopt the Standard, and the third paper is explicit that it "does not yet bind the Social Security Administration" (Puglisi, 2026c, Section 3.2). Whether Congress should bind the agency now sits on the legislative menu in

Document 3, Section 5.6, with the ABLE statute as one precedent (26 U.S.C. § 529A(e)(2)(B)). The rest of question 14 stays on the docket.

The privacy rule would bind every issuer and every recipient that receives an acknowledgment. How far recognition is required is a choice Document 3, Section 5.2 puts to Congress in two models. One is recognition by adoption, and the other is recognition required of the entities the ADA and Section 504 already bind.

5.2 The seven conditions

Condition	What the institution shows	Where the condition comes from
1. Accommodation path	Its AI policies carry the model clause or its equivalent	Puglisi (2026b), Section 16.3
2. The three questions	Requests are considered with the three questions and the four considerations	Puglisi (2026a), Section 6.1
3. The acknowledgment	A current acknowledgment is accepted as evidence of standing and is never demanded	Puglisi (2026c), Section 4
4. No action on a reading	No adverse action follows a detector score, a flag, or an impression until a named human decides on evidence	Puglisi (2026b), Section 16.1
5. The record	Each decision is recorded as accept, modify, or reject, with basis and date	Puglisi (2026c), Section 4.7
6. Confidential handling	The accommodation sits in a separate confidential file, and no public label is compelled	29 C.F.R. § 1630.14(c)(1)
7. Appeal	The person has a path to appeal	Puglisi (2026b), Section 16.1

The Act would write no new limit on damages. An employer that meets all seven would hold a record of the good-faith efforts the Title I damages provision already asks for, made in consultation with the person (42 U.S.C. § 1981a(a)(3)). For every other recipient the seven conditions are the test for the non-monetary paths in Document 3, Section 5.5. The record loses its value where the institution retaliates, discloses the accommodation, demands an acknowledgment as a condition, or acts on a reading alone.

The second paper supplies a test for whether the human review in condition 4 is real. Acceptance rates above 95 percent, or decision reversals below 2 percent, sustained across three consecutive cycles, trigger a mandatory audit under Checkpoint-Based Governance (Puglisi, 2026b, Section 16.1). Those thresholds are proposed and untested. An institution that relies on the seven conditions could apply the same test to its own reviewers.

6. The Rulemaking Docket

The Act would send the third paper's 28 questions to a rulemaking with the disability community at the table. One part of question 14, which asks who binds the Social Security Administration, goes to Congress instead. The paper states their status: "The paper asks them and does not settle them" (Puglisi, 2026c, Section 9). The table groups them by the paper's own reading guide and keeps its numbering and titles.

Group	Questions	At the table with the disability community
Eligibility and certification	1 Threshold. 2 Additional automatic qualifiers. 3 Who certifies. 10 Undiagnosed people. 12 Supported certification. 16 One credential or tiers	The lead agency, the Social Security Administration, and clinicians
The acknowledgment and its records	4 Who issues the credential. 5 Where records live and who protects them. 6 Temporary needs. 7 Reciprocity and adoption. 8 Misuse. 11 Another interpretation. 25 Protection without a card. 26 Misuse against minimum necessary	The lead agency, the issuer Congress selects, the states, and privacy advocates
Institutions and platforms	9 Platforms. 13 Acting on a reading. 20 Prior notice as a condition. 23 A right or a procedure. 28 Which register works	Employers, schools, courts, platforms, and publishers
Benefits	14 AI-enabled work and disability reviews. 15 General-purpose AI as a work expense. 17 Unpaid productive activity	The Social Security Administration, benefits specialists, and vocational rehabilitation agencies
Disclosure	27 Disclosure after the punishment ends	All participants
Devices	18 One sensor, two uses. 19 Blanket device bans. 21 Device classification. 22 Public hostility. 24 The defective device	Venues, courts, carriers, device makers, and bystander privacy groups

Four questions meet a choice the framework already makes, and the rulemaking would take them up with that choice on the record. On question 4, Congress selects the issuer from the menu in Document 3, and the rulemaking settles how the acknowledgment is made accessible. On question 7, Document 3 puts two recognition models to Congress, one by adoption and one required where the ADA and Section 504 already reach. On question 13, the seven conditions answer for adopters, and the question stands for everyone else. On question 14, Congress decides whether the no-inference rule binds the Social Security Administration, and the rulemaking keeps the question of how work done with the tool is read.

Review of this package raised sources and designs that go to the docket with the questions they inform. Question 2 gains a federal text that already gives "considerable weight" to past accommodations, and to an individualized education program or a Section 504 plan, in testing (28 C.F.R. § 36.309(b)(1)(v)). Question 5 gains retention and deletion periods, breach notice, and verification that works offline.

Question 25 gains a design with no central issuer, in which the specification is published and the public list names adopting institutions and never people.

The procedure sets two limits the Act would plan for. A committee holds 25 members unless the agency head finds that more are needed, and consensus means unanimous concurrence unless the committee agrees otherwise (5 U.S.C. §§ 562(2), 565(b)). The table above names 17 classes of participant beside the disability community. The Act would therefore state a minimum share of seats for people with disabilities and their organizations. It would also let the lead agency run the docket in tiers that follow the groups above.

Question 25 remains open in full. If the community rejects an acknowledgment, the three questions in Part 1 and the notice still stand without it, and the rulemaking would report to Congress what should stand in the acknowledgment's place.

7. The Dissent Register

The third paper carries eight objections to its own instrument and leaves each one standing. The Standard inherits all eight, and the rulemaking is where they are answered or sustained. Review of this package added three, and they are carried below the eight.

Objection, in the third paper's headings	A source that states it	What it puts at issue in the Act
Against the eligibility model	*Cleveland v. Policy Management Systems Corp.* (1999)	The automatic path rests on a definition built for total disability
Against certification and documentation	Macfarlane (2021; 2025); Committee on the Rights of Persons with Disabilities (2018)	The functional path requires a diagnosis that many people cannot obtain
Against the credential and the record	American Civil Liberties Union et al. (2025); California State Auditor (2017)	Any issuer record is a registry risk, and any credential invites misuse
Against private presentation and notice	Pierrès et al. (2025)	A person may have to disclose a disability to use the tool at all
Against the premise that AI is assistive technology	Autistic Self Advocacy Network (2025)	The tool makes errors its users cannot always detect
Against a credential overriding institutional rules	Puglisi (2026c), Section 8.6	A rule may assess the very thing the tool supplies
Against a disability-specific path at all	Springer Nature (2026); Sage Publishing (n.d.)	A function-based rule for everyone needs no card from anyone
The European Union's structural objection	Puglisi (2026c), Section 8.8	Outside the Act's reach, and carried for the comparison

Objection, in the third paper's headings	A source that states it	What it puts at issue in the Act
Against any limit on remedies, raised in review	American Civil Liberties Union (2018)	The Act adds no limit beyond the one Title I already has, and the objection stands against any later widening
That the Act asks too little, raised in review	Review of this package, November 2026	A statutory floor on what a person must show, and a separate claim for retaliation, would each be a new duty the framework does not propose
That Part 2 should wait, raised in review	Review of this package, November 2026	The acknowledgment would follow the Phase 0 evidence and the rulemaking's report on question 25

Two sources state the documentation objection with particular force. Macfarlane holds that a documentation requirement sorts people by their access to medical care. Obtaining documentation costs doctors' fees and time away from work that many people cannot spare (Macfarlane, 2021; 2025). Pierrès, Darvishy, and Christen warn that "Reducing GAI to an accommodation could force students to disclose their disability status to access it" (Pierrès et al., 2025). The specification answers neither. It records that the acknowledgment is optional, that the three questions work without it, and that the people who hold these objections are to be seated in the rulemaking.

8. Phase 0 Protocol and the Reporting Rubric

Phase 0 requires no appropriation. Volunteer agencies and institutions adopt the model clause and apply the three questions in the accommodation processes they already run. People who serve notice report what comes back.

The rubric is the third paper's, and a report carries its fields and nothing else: the recipient class, the date sent and the channel, the register used, the response and its date, whether a named person decided, the outcome, and any adverse action within six months (Puglisi, 2026c, Section 10). A report carries "no copy of the notice, no name, no diagnosis, and no institution named where naming it would identify the sender." Participation is voluntary, and the reports are read as the experience of those who sent notices, not as the prevalence of the problem.

Pilot sites may keep a second, optional record beside the rubric. It carries the functional outcomes of Section 2.7, the time from request to decision, and whether a person who showed standing once was asked to show it again. The record is aggregate and names no person, and it leaves the rubric as the third paper wrote it.

No identifiable notice or case file would be collected until a protocol with consent, redaction, access, retention, and withdrawal rules is published. The Department of Labor incident of 2026 shows what an accommodation file can expose when it leaves its office (Heckman, 2026b).

9. Alignment With Law in Force

No conformity assessment has been made, and the table describes design intent only.

Authority	What it requires	How the Standard aligns
ADA Title I, 42 U.S.C. § 12112	Reasonable accommodation, and medical information kept in a separate confidential file	The three questions give the individualized assessment a common form. The record rule follows the separate-file rule
ADA Title II, 28 C.F.R. § 35.130(b)(7)(i)	Reasonable modification of policies unless the change is a fundamental alteration	The model clause routes an AI rule to the modification process
ADA Title III, 28 C.F.R. § 36.302	The parallel duty for public accommodations	The same route, with the venue's defenses preserved
Section 504, 29 U.S.C. § 794	No exclusion from a funded program by reason of disability	The three questions apply wherever the funding reaches
Assistive Technology Act, 29 U.S.C. § 3002(4)	Defines the device by its use	The three questions apply that definition to AI
HIPAA, 45 C.F.R. § 164.502(b)	Minimum necessary disclosure by covered entities	The privacy rule takes the principle as its model and writes it as the Act's own
23 C.F.R. Part 1235	A uniform system with an entitlement-only face and reciprocity	The acknowledgment takes the mechanics and leaves the symbol and the public display
26 C.F.R. § 1.529A-2	Certification with the diagnosis retained, and a purpose limit	The functional path and the no-inference rule follow the pattern
Spain, Ley 4/2026	A right to use support products without forced deactivation	The three questions show when general-purpose software is such a product for a particular person
Section 508, 29 U.S.C. § 794d	Accessible technology when a federal department or agency develops, procures, maintains, or uses it	Federal agencies carry the accommodation path into the technology they procure
Assistive Technology Act, 29 U.S.C. § 3003	Grants to states for statewide assistive technology programs	The programs serve as a Phase 0 channel in every state and territory
ADA construction clause, 42 U.S.C. § 12201(b)	Leaves standing any law that gives greater or equal protection	The Act's savings clause follows it
ABLE statute, 26 U.S.C. § 529A(e)(2)(B)	Bars an inference from a disability certification for Social Security benefits	One precedent on the legislative menu for the no-inference rule

10. Known Limits

The specification does not settle how the gray area is considered, who certifies, who issues, or where records live. It has no field data. Its three questions have been applied to hypothetical cases, and its acknowledgment has no issuer. It does not bind a platform or a publisher, and it does not bind the Social Security Administration unless Congress chooses that. Its audit thresholds are proposed and untested. It does not reach a stranger in a public place. Each limit is stated in the third paper and carried here so that Congress reads the proposal at its true size (Puglisi, 2026c, Section 7).

11. Conclusion

Part 1 is three questions and four considerations, each taken from federal text already in force. The acknowledgment is an entitlement-only face, and the diagnosis stays with the person. The recognition rule is the placard's reciprocity applied to standing. The privacy rule is the minimum necessary principle written for this use. None of the parts is new, and the assembly is what the Act would fix.

What the specification leaves open is left open on purpose. The people who would hold the acknowledgment are the people who should design it, and the rulemaking is the place the Act gives them to do it. Phase 0 can begin with the resources agencies and institutions already have, and its record is the evidence every later phase would be judged against.

Related Documents

This Methods Addendum is part of the AIDA Act Congressional Package:

- Document 1: Summary Flyer (the ask in one page)
- Document 2: Same Standard, Different Means (the policy brief and the case for acting)
- Document 3: The AIDA Act (the legislative framework, the issuer menu, the recognition models, and the phases)
- Document 4: Methods Addendum (this specification, the rulemaking docket, and the dissent register)

This addendum states no appropriation figure. Congress retains full authority over the funding mechanism and the issuer, and Document 3 presents both as a menu, not a prescription.

References

Works by the author, with the sources supporting each

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Sources

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- Rehabilitation Act, Section 504, 29 U.S.C. § 794, and Section 508, 29 U.S.C. § 794d.
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- 42 U.S.C. § 1981a(a)(3).
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- 29 C.F.R. §§ 1630.2(j), 1630.14(c)(1).
- 45 C.F.R. § 164.502(b).

Canonical Definitions

AIDA = Artificially Intelligent Disability Assistance, the use of general-purpose AI as a disability tool. The acronym also named Canada's proposed Artificial Intelligence and Data Act, which died when Parliament was prorogued and has no tie to this work (Attard-Frost, 2025).

AIDA Functional Test = the three questions of Section 2.2: the barrier, the match, and the gain.

AIDA Act = the Artificially Intelligent Disability Assistance Act, the bill this package proposes.

AI Disability Standard = the three questions, the acknowledgment, and the recognition rule the AIDA Act would establish.

Acknowledgment = optional evidence of standing that shows entitlement only, with no diagnosis and no disability symbol.

Standing = that a person may invoke the protections the law already gives. Standing decides no accommodation.

Recipient = an employer, school, agency, court, venue, platform, or publisher that receives a notice or an acknowledgment. Section 504 uses the same word more narrowly, for a program that receives federal funds.

Adopting recipient = a recipient that has adopted the Standard.

Issuer = the body Congress selects to provide acknowledgments.

Artificial intelligence = the term as Congress defined it at 15 U.S.C. § 9401.

Checkpoint-Based Governance = the author's framework for human authority over AI-mediated decisions, in which the human decision is accept, modify, or reject.

Disclaimer

The author is not a lawyer, and this addendum does not provide legal advice. It is policy analysis based on public sources, cited materials, and human-AI review. It is not bill text, a legal opinion, or a compliance determination, and a reader considering legislation or a notice should consult qualified counsel.

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