

The Section 503 Compliance Checklist Appendix

This document serves as an appendix to the Disability:IN Section 503 Checklist. It is for general informational purposes only and does not constitute legal advice and should not be relied upon as such. For more insights and guidance on these topics, join Disability:IN's Inclusion Works.

Disability:IN Inclusion Works

DISABILITY:IN disabilityin.org/what-we-do/inclusion-works/

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Checklist for Digital Accessibility

- 1. Ensure all digital products are accessible and usable by individuals with disabilities. This includes websites, apps, products, services, experiences, training, presentations, documents, etc.**

This can be achieved through a combination of:

- Adopting the most recent and relevant industry guidelines and best practices, for example, W3C Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. <https://www.w3.org/TR/WCAG21/>
- Providing documentation of successful user acceptance testing by users with disabilities with and without assistive technology. <https://www.w3.org/TR/maturity-model/>

- 2. Identify an internal or external digital accessibility expert(s) for your company who can resolve accessibility and compatibility issues necessary for employees with disabilities to use internally facing digital products.**

This includes any party that your company interfaces with as part of your business.

- For example, you have an employee resource center or IT help desk for employees with disabilities. Any type of centralized communications/support center is acceptable.

- 3. Your company has support people/teams with processes in place to handle requests for accessible formats.**

This should include communications with either external and/or internal sources that your business engages.

- For example, if a client, customer, or employee needs large print or Braille materials, or captioning on a video clip, ensure there is a process in place to handle such requests.

- 4. Before purchasing digital products, your procurement team requires vendors to complete a vendor accessibility questionnaire.**

Disability:IN has created the Procure Access Questionnaire. By working with these questions, you join a global business community committed to buying and selling accessible products and services that employees, customers, and the public with disabilities can use: <https://disabilityin.org/resource/accessible-procurement-questions/>

Tips for a Successful Disability Focused Business Resource Group (BRG)*

**For the purposes of this paper, the term Business Resource Group (BRG) includes other similar terminology such as Affinity Group or Employee Resource Group*

Introduction

Many companies have expressed an interest in establishing or refreshing a Business Resource Group (BRG) to help further their disability inclusion efforts. BRGs should have a business focus, e.g., attracting customers with disabilities who tend to be brand loyal, recruiting talent with disabilities, etc., and should have an executive sponsor who is a member of the executive leadership team. Companies just forming disability focused BRGs should review how their company has established other BRGs. There are many similarities to BRGs for other constituency groups; however, there are also some important differences.

Organizations seeking to enhance inclusion should engage individuals from that constituency to lead and inform their outreach and inclusion strategies. As an example, an initiative focused on enhancing career opportunities for women is not likely to be informed primarily by men. People with disabilities need to be fully included as leaders in developing and implementing a successful disability inclusion strategy.

Disability BRGs should ensure that employees with disabilities are represented. This may mean the BRG has two co-chairs, one representing employees with disabilities and the other co-chair representing family members/caregivers. All allies should be welcomed.

This may result in subcommittees so that employees with disabilities are able to contribute on issues impacting them specifically, for example: easily accessed accommodations policies for applicants and employees, career ladders & opportunities for professional development, and creating a disability-friendly brand to attract talent and customers with disabilities. To ensure maximum participation, organize virtual and off-shift meetings so hourly and workers in other locations can participate.

Here are common questions companies ponder when considering a disability focused BRG:

1. Do we have enough people with disabilities to merit/support a BRG?

According to the latest research:

- 1 in 4 Americans has a disability in the U.S. This is approximately 61 million people, or 25 percent of the population (Centers for Disease Control (CDC), 2022)
- 70-75% of disabilities are non-apparent (U.S. Census Bureau)
- Depression is the leading cause of disability worldwide (World Health Organization) and the leading cause of disability in the United States for people ages 18-44 (National Institute of Mental Health).

Many people do not realize that the ADA's definition of disability is comprehensive and includes individuals experiencing metabolic conditions like cancer, heart disease and diabetes, as well as people with learning, attention and sensory conditions.

Given these statistics and the broad definition of disability, it is very likely that you have more than a sufficient number of individuals with disabilities to form a BRG. The challenge is getting people to believe it is safe and career enhancing to identify as a person with a disability.

2. We seem to have more family members and caregivers interested in starting a BRG than people who identify as having a disability, how should we address this?

The needs and interests of family members and caregivers of persons with disabilities and people who have disabilities have similarities and distinct differences. Family members and caregivers tend to focus on enhancing health care benefits for their dependents and encouraging the organization to support philanthropic events to raise funds for research and broader societal acceptance.

Individuals with a disability, like employees from other diverse constituencies, are usually more interested in enhancing the company's internal workplace practices and culture, and career development opportunities.

Family members and caregivers are more likely to feel comfortable having coworkers know they are aligned to this community, as well as advocating for their loved ones' needs. They do not perceive the same potential risks associated with having others know about their relationship to disability. They can therefore sometimes dominate the BRG.

It is important that both groups feel heard and understood as the company develops the organization's overall disability inclusion strategy. To this end, it may be useful to have co-chairs serve as the leaders of your BRG: one representing those with a disability, and the other family members and caregivers.

Over time, you may end up decoupling the two groups into separate BRGs that come together to collaborate; however, when getting started it is usually necessary to combine them in order to have enough critical mass to get tasks accomplished and better engage the broader workforce in events.

3. What else can we do if employees with disabilities are reluctant to get involved?

Communicate a robust business case reinforcing the reasons why your company values people with disabilities as customers and employees. Connect the case to your self-identification survey, if your company is a federal contractor.

Some companies have used corporate communications to establish an internal communications plan to attract members. Be sure to communicate that top leadership supports disability inclusion and the formation of your BRG.

Asking executives, managers and employees at all levels of the company to tell their stories related to their own or a family member's or loved one's disability will make it easier for employees with disabilities to join the BRG.

A strategy that many organizations have utilized to stand up a BRG, and/or to refresh a team that has become stalled, is to ask a team to evaluate and help refine the process your company uses for reasonable accommodation.

An outcome of the experience of working on such a project may be a strong BRG team emerging or a BRG that is revitalized and able to address other disability inclusion opportunities. Other companies have engaged their BRGs by encouraging them to take the lead on developing, planning, implementing and promoting the company's self-identification campaign.

4. What if we have traditionally had a more philanthropic and/or medical approach when we talk about disability in our organization?

In keeping with what is normative in U.S. culture, most Americans and American companies have historically thought of disability as an area to focus their charitable giving and/or as a medical issue. This has impeded efforts to view individuals who have a disability as talent that can help make the organization more competitive, or view customers with disabilities and their stakeholders as a source of significantly greater revenue opportunities and market share. It is therefore suggested that one of the roles your BRG plays is to help the organization shift to a social model for disability, which is very similar to understanding the civil rights and social justice history associated with the other dimensions of diversity and inclusion.

Disability:IN has many resources to support this approach including webinars, an annual global conference, consultative resources, a Section 503 Self-Evaluation Tool, and the signature Disability Index. To learn more please go to <https://disabilityin.org/>.

5. How do we ensure the BRG is aligned with our business?

The BRG should establish a group business plan with realistic goals and present it to senior executives, an executive sponsors, and other leaders. The plan should include goals that dovetail with business priorities, e.g., new customers, recruitment, development/refinement of the self-identification campaign, review of reasonable accommodations policies and practices, and an overall inclusive culture. The plan should include goals with metrics to evaluate the BRG's effectiveness on a semi-annual or annual basis.

The following is an excellent example of one company's BRG business alignment Focus Areas:

Employment & Recruiting

- Create & Promote Employment Models across the company
- Support Recruitment and Hiring of Qualified Candidates with Disabilities

Employee Engagement & Support

- Increase Employee Awareness, Enabling Self ID & Network Engagement
- Continue Development and Expansion of Mentorship Program
- Employees with Disabled Dependents (EwDD) – Continue to Thrive
- Facilities, Resources & Tools – Support Universal Accessibility for ALL

Market Place & Partnerships

- Expand Network to Other Regions
- Participate in Industry/External Forums to Share & Reapply Best Practices
- Drive Consumer Demographic Awareness and Market Size Opportunities Within the BRG

6. What value would a BRG contribute to our business objectives?

The areas where BRG's have added value include, but are not limited to:

- a) Enhancing the efficiency and effectiveness of the company's reasonable accommodations process and communications.
- b) Sourcing talented candidates with disabilities.
- c) Encouraging people with disabilities to self-identify, as required under Section 503 of the Rehabilitation Act for federal contractors.
- d) Raising disability inclusion awareness by hosting speakers, training, and demonstrations of enabling technologies.
- e) Demonstrating true inclusion by engaging the BRGs from the other constituency groups at the company through joint projects.
- f) Enhancing the company's external brand and product and service portfolio for customers/clients who have a disability and/or who are family members/caregivers.
- g) Understanding and better addressing the needs of employees with disabilities or those who are caregivers/family members.
- h) Retaining and developing employees with a disability.
- i) Delivering a return on investment with overall enhancements in productivity, retention, returning to work after medical leave, safety, and employee engagement.

Conclusion: Individuals with disabilities represent America's largest minority group; disability touches all other dimensions of diversity. Having a strong disability focused BRG will aid your company in creating and expanding a culture of inclusion that contributes to your business success.

Strategies for an Effective Self-Identification Campaign

Introduction

In March 2014, the US Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) finalized the revised rule for Section 503 of the Rehabilitation Act of 1973 (as amended). The rule requires covered federal contractors to invite applicants and employees to inform the contractor whether they are an individual with a disability, as well as many other compliance requirements.

Non-federal contractors are not required to launch self-identification initiatives, but many companies have decided to move forward with self-identification, so they have a better understanding of their workforce's needs.

Recommendations for Effective Self-ID Campaigns

Based on research conducted by the Disability:IN team, the following are recommendations aimed at improving the effectiveness of self-id campaigns and creating a culture of belonging for applicants and employees with disabilities.

Why Are You Asking and What is in it for Employees to Self-Identify?:

Gaining an understanding of why your company is asking, why the information is important, and what you hope to learn will help you frame your messaging. Finally, why should employees self-identify? What is in it for them.? The best way to learn this information is to ask employees with disabilities through informal conversations or organized listening sessions. Disability Business/Employee Resource Groups (B/ERGs) can be especially helpful to the planning of your self-id initiatives.

Executive Commitment:

As with any initiative, executive support is crucial to success.

Develop a Communication Plan with Deadlines and Assignments:

One company developed a detailed communication plan that outlined every step of the upcoming self-id campaign. Another ensured that its leaders/supervisors/people managers understood why and how the company was requesting employees to self-identify *before* they asked. If your company has a Disability Business/Employee Resource Group (B/ERG), encourage its members to become involved in developing & launching the plan.

Consider Creating a Memorable Campaign with a Catchy Slogan:

One company's intranet featured a video and article about a popular veteran who recently identified as an individual with a disability. He did not disclose his disability, which makes it clear to other employees that you do not have to reveal the type of disability when you check the box 'yes'. Regularly featuring talented employees with disabilities as the face of the campaign sends a positive message. Encouraging

employees at all levels of the organization, from the C-Suite to the frontline, to openly state that they have a disability will reinforce the message and make it relatable to your employees.

Communicate Why the Company is Asking and Assure Confidentiality:

Frame the request to self-id in a way that employees realize there is a benefit to them and others. For example, "Self-identifying will help our company gain a greater understanding of the make-up of our workforce and help us to be more responsive to the needs of employees with disabilities." Ensure that employees with disabilities understand they are vital to the company's growth as members of the country's largest minority group, e.g., "Inclusion of people with disabilities is essential to the well-being of our company because it fosters creativity and innovation." Be sure to also communicate how the information will be used and protected.

Develop a Frequently Asked Questions (FAQs) Document and Use it to Create Awareness Among People Managers:

In most cases, employees will reach out to their manager to ask questions about self-id. To ensure that managers can easily answer questions and are committed to encouraging employees to respond to the self-id request, develop a frequently asked questions document that can be easily circulated to managers and employees.

Raise Awareness of the ADA's Definition of Disability:

Many people are not aware that what they have is a disability. Use your FAQ document to outline what is a disability. Using the definition of disability from the American with Disabilities Act (ADA) outlined in Section 503 and listing out examples of the most common disabilities will foster understanding.

Provide Training and Resources to Improve Disability Awareness:

This is critical for talent acquisition teams who are responsible for identifying prospective employees and for supervisors/hiring/people managers who will be working with more employees with disabilities. Create training with an open dialogue that permits leaders to safely ask questions. Making staff feel more comfortable will pave the way for successful inclusion of existing and new employees with disabilities.

Reasonable Accommodations & Adjustment (RA) Guidebook Example

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This sample reasonable accommodations policy and procedures provided in this guidebook are intended to assist Disability:IN corporate partners in establishing or enhancing their reasonable accommodations program.

- Note that this sample policy/guide was written for the USA. There are state and country specific local laws that the organization must also be aware of and have the responsibility of knowing. Implementation of these suggestions will necessarily need to be adjusted based on requirements of the local laws, culture, and norms.

Overview

[ORGANIZATION] is committed to providing qualified job candidates and employees who have disabilities with reasonable accommodations/adjustments upon request, unless the accommodation would pose an undue financial and/or operational hardship for [ORGANIZATION].

Individuals may request a reasonable accommodation/adjustment (RA) to participate in the application process, perform the functions of their job, or enjoy the benefits and privileges of employment with [ORGANIZATION]. An interactive process is used to determine the best type of accommodation in each situation and whether the requested accommodation is reasonable.

When [ORGANIZATION] provides RAs to its candidates and employees, it removes barriers that prevent individuals from applying for jobs or performing jobs for which they are qualified, and it expands the pool of qualified workers. [ORGANIZATION] benefits from the talents of people who might otherwise be arbitrarily barred from employment.

Making Requests

Requests for an RA can be made verbally or in writing. All requests must be documented on the Reasonable Accommodation Request Form (see Appendix). If an initial request is made verbally, the individual should then complete the Request Form. If the employee needs assistance filling out the form, they can ask their HR representative for assistance.

If a disability is visible or already known as the requesting employee has recently been promoted or transferred to a different role and they had an accommodation in place previously, the organization may elect to forego some type of medical form being supplied by a health care provider as proof of disability and the nature of the accommodation is not needed to fulfill the request.

Requests usually come from an employee (existing or prospective), their supervisor or hiring manager, or someone in HR/Talent Acquisition. In some cases, a family member, health professional or other representative acting on the individual's behalf may make a request (e.g., notifying HR that someone has been hospitalized and an expected return-to-work date, a request for interpretive services).

Keep in mind that employees or job candidates may not use the specific words "reasonable accommodation" to initiate a request for an RA; they might refer to the issue they're experiencing. This must be treated as a request. For example:

- "I'm having trouble getting to work on time because of my medical treatment."

Employer Note Regarding Key Roles

Reasonable Accommodations / Adjustments Coordinator (RAC)

HR should identify and train at least one employee to serve as a designated Reasonable Accommodations Coordinator – a role that may be full or part time, depending on the size of the organization. Back-up personnel should also be identified and trained in the event the RAC is not available when needed.

Reasonable Accommodations / Adjustments Appeals Manager

Someone in either HR or Legal should be designated to handle the reasonable accommodation appeals process. While such appeals are rare, the process must be transparent and described in the policy.

- “My wheelchair can’t fit under the desk.”
- “Is there flexibility regarding the time allocated to take this test?”
- “I have a weekly counseling appointment with my therapist.”
- “I am running out of energy which is causing me to have trouble focusing.”
- “I am distracted by things going on at home (parents, family, children etc.)”

Role of the Reasonable Accommodations Coordinator

The designated Reasonable Accommodations Coordinator’s (RAC) role is to:

- Review and process all requests for RAs
- Act as the primary decision maker and arbiter for any requests
- Request and review medical documents, as needed, to confirm that an applicant or employee requesting an RA is an “individual with a disability” and whether the requested accommodation is necessary to:
 - Enable the person to participate in the selection process for a job
 - Perform the essential functions of a position
 - Access the normal benefits and privileges of employment
- Collaborate with external subject matter experts and/or appropriate internal staff (e.g., managers/supervisors, HR, Facilities, DEI, Disability E/BRG, Finance, Legal, Safety, Security, IT) to make informed decisions regarding approval or denial of an RA.
- Collect and track information regarding the RA process at each key step (e.g., initial request, nature of accommodation, time to fulfill, cost of accommodation, satisfaction level of all parties) and provide a quarterly report to [NAME OF FUNCTION].
- Serve as primary contact for individuals with disabilities, managers and supervisors, and any other parties involved on a need-to-know basis throughout the process
- Provide an on-going assessment of the RA program.

The RAC is responsible for all recordkeeping and tracking related to RA requests, including:

- Number of RA requests through the job application and selection process and whether those requests are granted or denied
- Number of RA requests from employees and prospective employees and whether those requests are granted or denied
- Job titles for which RAs have been requested
- Number and types of RA requests for each job that have been approved and denied
- Reasons for denials of RA requests
- Timeframe for processing each RA request

- Sources of technical assistance consulted in trying to identify possible reasonable accommodations.

Role of Managers and Supervisors

The more actively engaged and supportive managers/supervisors are in this process, the better. They should work closely with the RAC to implement all aspects of the RA policies and guidelines.

The role of a manager/supervisor in this process is to:

- Consult with HR if they observe or learn about a candidate's or employee's need for an RA
- Determine whether the individual can perform the essential job functions and, where necessary, assess whether an RA can be made to enable the individual to safely perform these functions (see the Reasonable Accommodations Assessment Form in the Appendix)
- Identify the individual's abilities and limitations and collaborate with the person on finding potential accommodations
- Work with HR, when requested, to obtain medical information regarding the disability and the individual's functional limitations. (Note: Managers will not request or have access to medical information provided by health care professionals. HR will make such requests and store this information consistent with Healthcare Privacy regulations).
- It is imperative that the Manager understands that any accommodations provided and/or disability related self-disclosure information is held as highly confidential and should not be shared beyond a "need-to-know" basis to implement the accommodation. Any inquiries of this nature should be redirected to focus on the needs of the person who is asking about the individual with a disability and a firm reminder that we honor all employee's privacy. The leader can speak with the employee and HR to discuss if there is any need to address the accommodation with the rest of the team, and what, if anything the employee is comfortable sharing. The employee's privacy is most important, but we want to encourage a dialogue to ensure alignment.
- Leaders are likely to have a number of different perspectives given their geographic location/country they are currently in. Education and awareness for inclusion of people with disabilities is most definitely needed in all locations that is customized/culturally appropriate to each site.

Note: It is a violation of [ORGANIZATION]'s policies to discriminate or retaliate against qualified job candidates or employees because they need, or may need, a reasonable accommodation for a disability. Violations of this policy may be subject to disciplinary action.

Making the Process Interactive

The RA process should be an interactive one that involves the mutual sharing of information and ideas between the individual with a disability, that person's manager and the RAC. "Interactive" is characterized by direct, candid and mutually cooperative communication that helps the RAC make a well-considered and informed decision to either grant or deny the RA request.

The process is an opportunity to:

- Obtain and exchange information regarding what a person with a disability needs to contribute to his/her fullest potential
- Consider accommodation alternatives that meet both the business and personal needs of the parties involved
- Consult, if needed, with internal and/or external subject matter experts. (e.g., the Job Accommodation Network)

Communicating About RAs

HR should communicate that a description of [ORGANIZATION]’s reasonable accommodation procedures and any related forms are readily available, using these channels:

- Careers web page
- Intranet
- Interview process
- New employee orientation
- Manager training guides
- Appropriate company meetings
- Annual benefits open enrollment
- Anywhere other HR information is posted
- Campus presentations or events
- Diversity Equity and Inclusion internal/external communications.

In cases where there is a concern over an employee’s performance, an RA can be noted along with other resources (e.g., training and development, EAP, tuition reimbursement) as a possible solution to the performance issue.

Definitions

Disability – A person with physical, medical, mental or psychological impairment; or a history or record of such an impairment; or being regarded as having such an impairment.

Qualified Candidate or Employee – An individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of a position and who—with or without reasonable accommodation—can perform the essential functions of that position or can complete the application and selection process.

Essential Functions – Duties that are fundamental to a position that the individual holds or desires that the incumbent cannot do the job without performing them. A function can be “essential” if, among other things:

- The position exists specifically to perform that function

- Only a limited number of employees are available to perform the function
- The function is so specialized and the individual is hired based on their ability to perform the function
- The function cannot be delegated.

Evidence of what constitutes an essential function may include, but is not limited to: RAC's judgment; written job descriptions; the amount and/or proportion of time spend performing the function; the consequences of not requiring a function; and the work experience of incumbents.

Reasonable Accommodation (RA) – A change or adjustment that enables a person with a disability to apply for a job, perform job duties, or enjoy the benefits and privileges of employment that are equitable with those enjoyed by similarly situated employees without disabilities. The change/adjustment promotes equitable employment opportunity for an individual with a disability. Equity ensures that people starting with barriers or with significant challenges are given the same opportunity to be successful and achieve their goals and aspirations.

There are three categories of RAs:

- I. Modification or adjustments to a job application and selection process to permit an individual with a disability to be considered for a job (e.g., providing application forms in alternative formats like large print or Braille, providing a sign language interpreter, responding to interview questions in writing, all interviews taking place in one location, or allowing extra time to take a test)
- II. Modifications or adjustments to enable a qualified individual with a disability to perform the essential functions of the job (e.g., providing phone amplification, computer screen magnification, screen reader, sign language interpreter or a flexible work arrangement)
- III. Modifications or adjustments that enable employees with disabilities to enjoy equal benefits and privileges of employment (e.g., ensuring training or special events hosted by [ORGANIZATION] are held in locations that are physically accessible, making the cafeteria more accessible, and accommodating employees during training programs and presentations).

The Process

Fulfilling Requests

If there is more than one possible accommodation, [ORGANIZATION] will give primary consideration to the individual's preference. The RAC does have discretion, however, to choose among various accommodations that enable the individual to perform the essential job functions. If a different accommodation is granted, the RAC should document the rationale for the alternative selection as part of the recordkeeping process and follow up to see if the accommodation is meeting the identified need to everyone's satisfaction.

As a general rule, the decision on an RA request should be made within 10 business days. If the RA cannot be completed within a 10-day period, the person with a disability—and the person's manager, if any— should be given written notification that documents the delay, reason (e.g., extenuating circumstances such a delay in acquiring necessary equipment) and expected timing for completing the process.

If fulfillment of the request is delayed beyond 30 business days and all related documentation has been submitted, the RAC should notify the person/department responsible for appeals with an explanation of the reason for the delay and expected timing for completion.

Verifying Disabilities

When a disability or the need for an accommodation is not obvious, [ORGANIZATION] may ask candidates and employees for reasonable documentation about the disability and related functional limitations. [ORGANIZATION] may require only the documentation that is needed to establish that a person has a disability, and that the disability necessitates a reasonable accommodation. Such documentation may include:

- Nature and duration of the impairment (e.g., functional limitations, equipment needed, side effects of any treatments pertinent to job, working hours/rest periods required, support animals, etc.)
- Types of activities the condition limits (e.g. lifting, sitting, standing, walking, reading computer screen, hearing on phone, etc.)
- Why the individual requires an accommodation—either in general or a specific type—and how the RA will assist the individual to apply for a job, perform the essential functions of the job, or enjoy a benefit of the workplace. (e.g. screen reader, flexible work arrangement, ergonomic workstation set up, etc.)

In limited circumstances, medical examinations or more detailed medical documentation may be needed to determine whether an employee can perform the essential functions of the job and what accommodations may be appropriate. The RAC should inform the individual why the provided documentation is insufficient and what additional information is needed. Any additional requests for information should specify what type of information is needed regarding the disability, its functional limitations, and the need for reasonable accommodation.

The individual requesting an accommodation may be asked to sign a limited release allowing [ORGANIZATION] to submit a list of specific questions to the health care or vocational professional or have [ORGANIZATION]'s own physician contact the individual's health care provider. (See Authorization for the Release of Medical Information in Appendix).

[ORGANIZATION] may *not* request medical information when:

- Both the disability and the need for reasonable accommodation are obvious, or
- The individual already provided [ORGANIZATION] with sufficient information to document the existence of the disability and functional limitations, unless the disability is temporary, or the condition is subject to change.

If an employee has a visible or apparent disability, but there is a question as to whether the requested accommodation would be effective, a subject matter expert should be consulted.

Analyzing Essential Functions

The reasonable accommodation process often can be accomplished without a formal analysis of the job's essential functions and the employee's job-related limitations. For example, if an employee, who

uses a wheelchair, requests that a desk be elevated on blocks and that accommodation is implemented, the process is completed without a formal analysis of the essential job functions.

Other situations may require an analysis to determine whether the employee can perform the essential functions of the position and if the request is granted, whether the accommodation is reasonable, if there is an alternative/vacant position they could perform, or if the accommodation presents undue hardship to [ORGANIZATION].

Reasonable Accommodations for Job Candidates

Job candidates with disabilities who want to request an RA may complete the Reasonable Accommodation Form (see Appendix), which can be made available as an option at the first possible opportunity in the application process. The RAC is responsible for helping candidates complete any documentation, or the candidate can provide another form of documentation.

The RAC should not speculate that just because a candidate requests an RA during the hiring process that the individual will also need an RA to perform the job if hired. The candidate may or may not need an RA upon hire, and if an accommodation is needed, it may not be the same type or degree as the one needed during the application and selection process.

It is generally the responsibility of the individual with the disability to request an accommodation. [ORGANIZATION] must reasonably accommodate disabilities when made aware of them; the organization is not responsible for accommodating any disability that is not observable or made known. Once [ORGANIZATION] is aware of a candidate's disability, the recruiter and RAC should initiate discussions about an RA and initiate the request process.

Application and/or Job Description Language (offer an opportunity to “opt-in” for support)

[ORGANIZATION] is committed to fostering an inclusive, accessible environment, where all employees are valued and given equal access to career opportunities. We are dedicated to upholding a workforce that reflects the diversity of the communities in which we live in and serve. As such, we welcome applicants, candidates and employees of all races, ethnicities, genders, sexual orientation, and diverse abilities to join our team.

Moreover, in order to ensure that qualified applicants and candidates are fully supported where applicable during the hiring process (anywhere from job application to interviewing, role assessments or onboarding) [ORGANIZATION] is dedicated to providing reasonable accommodations upon request and complying with all applicable provisions of the Americans with Disabilities Act, as amended (“ADA”), and applicable state and local laws.

If during any phase during the recruiting/hiring process you are in need of reasonable accommodation support, please engage your recruiter and advise them on how [ORGANIZATION] can best support you through the process.

Recruiter Reasonable Accommodation (RA) Process and Accompanying Talking Points

- 1. Thank applicant/candidate for their candor in reaching out to request support.**

- Thank you for letting me know that you may need reasonable accommodations. We are committed to ensuring that all applicants and candidates have a level playing field when applying/being considered for our roles.
- 2. Understand applicant/candidate accommodation needs.**
- We have dedicated teammates who provide RA support and I am happy to engage them to further assist you.
 - So that I can get you connected to the appropriate teammate to best help you, I'll need to gather a few details from you regarding your RA needs.
 - Can you please advise on where you may need support during the recruiting/hiring process – for example, do you need support applying for a role, during the interview, assessment or onboarding process?
- 3. Actively listen to applicant/candidate responses and take relevant notes.**
- Example: John Smith has a cochlear implant and may need an ASL interpreter for any interviews and role plays.
 - Example: Jane Doe finds it challenging to read small print but does not have software readily available to zoom in on online job application. In addition, any assessments are preferred in large print vs online.
- 4. Acknowledge information given and advise the applicant/candidate on next steps.**
- Thank you for this information. Based on what you've advised, I am going to get you connected to our RA team. I will reach out to them on your behalf and make them aware of what you have shared with me. They will reach out to you within 1-2 business days via phone, so be sure to check for missed calls/voicemails. If they are unable to reach you, they will follow up with a voicemail and email, should you elect to authorize use of an email as an appropriate contact method.
- 5. Confirm the applicant/candidate's contact information: phone, email address, general availability, and time zone.**
- 6. Advise applicant/candidate on action to take if they have questions in the meantime or if they are not contacted within 1-2 business days.**
- If you have any questions while pending contact from the RA team, please reach out to me directly so that I may support you. In addition, if you haven't been contacted by the RA team within 2 business days, please let me know right away so that I may follow up on your behalf.
- 7. Submit summary of the applicant/candidate's request to the RA team immediately, marked "urgent" and time sensitive.**

[Process map of Recruiter engaging RA team \(enclosed\)](#)

Confidentiality of Medical Information

All [ORGANIZATION] personnel must respect employee confidentiality. An employee's request for an RA and all steps taken to review the request and provide any accommodation should be treated as a confidential matter. Information should be disclosed only on a need-to-know basis.

When an employee requests an accommodation, all documentation and information concerning the individual's medical condition or medical history must be collected on forms separate from other personnel-related forms and maintained in separate medical files. The information shall be treated as confidential medical records. Medical information may be provided to: *{Note to employer: Please verify with your legal adviser}*

- Supervisors/managers need ONLY to be informed about work restrictions and/or reasonable accommodations and should not have access to the medical/health documentation
- First-aid and safety personnel who need to be informed if the disability requires emergency treatment
- Government compliance officials
- Workers' compensation offices that need information as required by law
- Insurance providers who may require such information
- Other [ORGANIZATION] authorized personnel who need to be consulted in order to identify, obtain and install the accommodation solution.

Unauthorized disclosure of confidential medical information can result in disciplinary measures. *{Note to employer: Please consult with your legal adviser as to appropriate measures.}*

What Accommodations are Reasonable? How Do You Determine a Reasonable Accommodation?

Selecting a reasonable accommodation depends upon the circumstances of each case. Examples of reasonable accommodations include, but are not limited to, the following:

- Making facilities accessible to and usable by people with disabilities (e.g., providing ramps, accessible restroom facilities, accessible parking and building egress and clear/visible directional signage)
- Restructuring jobs (e.g., reassigning non-essential keyboarding, telephone or other clerical assignments among employees, assignment of non-essential tasks to others, eliminating non-essential tasks)
- Modifying work schedules (e.g., permitting part-time work schedules, alternative starting and ending times, telecommuting/remote work)
- Providing or modifying equipment, devices, or materials (e.g., adjustable or sit/stand desk for an employee with mobility limitations, installing text readout telephones, screen reading software, screen magnification software, additional and/or larger computer monitors, or written materials in alternative formats such as Braille, enlarged print, digital/electronic version)
- Providing qualified readers, sign language interpreters, or other support services during the application, interview, and testing processes, and during training and other employment-related activities, including social functions.
- Changing workplace practices, such as emergency evacuation procedures or security requirements for nearby parking
- Providing leave of absence

Note: The RAC must comply with the Family and Medical Leave Act (FMLA), a federal law that requires employers to allow employees a certain amount of leave time for their own health conditions or to care for certain family members with serious health conditions.

Personal Items

[ORGANIZATION] is not required to provide personal items needed both on and off the job, such as hearing aids, prosthetic limbs, wheelchairs, or eyeglasses. Such items may, however, constitute an RA where they are specifically designed to meet job-related—not personal—needs. One example would be eyeglasses that enable an employee to view a computer monitor, which may be unnecessary outside the office. Also providing a second wheelchair to access a clean room environment.

RAs may also include permitting an employee to use aids or services that the employer is not otherwise required to provide. For example, while [ORGANIZATION] may not provide a motorized scooter, it might make a reasonable accommodation to provide an on-site storage area for a scooter.

The RAC should advise employees who have received an RA that they have a duty to notify HR if at some point in the future they no longer require the accommodation. The RAC should periodically review the continuing need for RAs, and whether provided accommodations continue to be effective and satisfactory to all concerned parties.

Undue Hardship

A requested accommodation is not a reasonable accommodation if it imposes an undue hardship for [ORGANIZATION]. An undue hardship is relatively rare, but may exist when an accommodation is significantly difficult, unduly costly, extensive, substantial, or disruptive, or would change the nature or operation of the business. Determination of undue hardship should be based on several factors, including:

- Nature and cost
- Overall financial resources
- Number of employees at the facility
- [ORGANIZATION]'s operation, structure and functions within the workforce, and the geographic distribution of work sites (e.g., requirement to travel between sites may be essential to a job)
- Impact of the accommodation on the operation of the facility (e.g., clean room requirements).

Note: A frequently requested accommodation is to work remotely from home. Prior to the COVID19 pandemic these types of requests were frequently denied, but when it became necessary for many employees to work from home this "accommodation" was quickly implemented. Organizations should carefully assess whether a request is feasible and during the interactive process be open to considering alternative ways of performing the job that they may not have been accustomed to but could work with the right supports in place.

Denying an RA Request

If HR and the employee/prospective employee cannot agree on a reasonable accommodation that is effective and does not impose an undue hardship, the request denial must be documented using the Reasonable Accommodation Denial Form (see Appendix).

Examples of why a request might be denied include: inadequate medical documentation to establish that the individual has a disability or needs reasonable accommodation; the requested accommodation would not be effective; and the accommodation would pose an undue hardship for [ORGANIZATION]).

The denial form must document:

- The reason for the denial
- The name and job title of the person who made the decision
- If a specific requested accommodation is denied and another offered in its place, the reasons for the denial and the reasons [ORGANIZATION] believes the chosen accommodation will be effective
- Information about the individual's right to file an EEO complaint and to invoke any other applicable statutory processes
- Information about the availability of the appeals process.

Note: Your organization needs to develop and communicate your appeals process. Ideally, someone outside the RAC's management hierarchy should be designated to resolve RA appeals, and your Legal department be consulted before a final decision is rendered and communicated. The appeal process should take no longer than 30 days, and the person designated to handle appeals should communicate the final decision and accompanying rationale both verbally and in writing to the employee.

The Reasonable Accommodation Denial Form should be attached to the Reasonable Accommodation Request Form. Before notifying the individual of the denial, the RAC should consider consulting with appropriate Legal and HR personnel to get agreement on the decision.

Reassignment

If no effective accommodation will allow an employee to perform the essential functions of the job, a job reassignment may be the "last resort." [ORGANIZATION] is under no obligation to create a new position or move other employees from their jobs in order to create a vacancy. Reassignment may be made only to a vacant position and when the person with a disability meets the qualifications.

HR is responsible for searching for a reassignment and consulting with the affected employee to determine whether he/she:

- Wants to limit the search in any way
- Is qualified for a particular job
- Would need a reasonable accommodation to perform the essential functions of the new position.

In cases where reassignment is the only alternative, HR should explain to employees why they cannot be accommodated in their current positions and find out what parameters, if any, they would consider in a reassignment. HR should inquire whether an employee is willing to be reassigned:

- Outside the facility or outside the commuting area and, if so, to what locations
- To a different type of position for which they are qualified and, if so, to what type(s)
- To a different area within the department and, if so, to which one(s)
- To a lower grade position—if reassignment to the same pay grade is not feasible—and, if so, down to what level.

Appeal Process

When [ORGANIZATION] is unable to fulfill a request for an RA, an employee or job candidate may appeal the decision within 10 business days of the denial. [*Note to employer: You need to determine who will manage the appeal process.*] The person in this job function will:

- Review the RA request and all related documentation, standards, procedures and potential accommodations considered
- Meet and/or consult with the individual or/and others involved parties
- Evaluate the effectiveness of the request and that it does not create an undue hardship, giving primary consideration to the individual's preferences.

[ORGANIZATION] must issue a written determination within 15 business days of the appeal. If the requested accommodation is determined to be effective and does not create an undue hardship, the determination will specify the type of accommodation and, if necessary, direct the appropriate [ORGANIZATION] representative to implement it promptly.

Conflict of Interest

The RAC and other HR personnel will be recused from handling, investigating or making final decisions if an individual files an appeal or complaint challenging [ORGANIZATION]'s handling of an RA request. This recusal is a safeguard against any actual or perceived “conflicts of interest.”

Creating a Business Case for a Centralized Accommodation Budget

A centralized accommodation fund is an enterprise-wide general fund used to either partially or entirely fund reasonable accommodations for employees with disabilities. This is considered a best practice. While individual companies reserve the right to define how the centralized cost pool will be utilized, funds are generally intended to cover services and equipment that facilitate equal access in the workplace. Categories/examples include:

- Communication access supports: CART services, sign language interpreting services, captioning services
- Visual access supports: visual interpreting services, alternative format production services, readers
- Adaptive technology and equipment: adaptive software like JAWS, Zoomtext, etc, adaptive hardware like trackball mouse, one-handed keyboard, etc

There are several benefits associated with creating a centralized accommodation fund. The following considerations may assist in justifying the need for a centralized fund:

- From an employee experience perspective, a centralized cost pool reduces the likelihood that an employee will avoid requesting an accommodation that might appear costly in a budget constrained environment. An employee will also realize increased productivity when provided with the tools necessary to effectively engage in their work.
- From a business line perspective, a centralized cost pool eliminates concerns about the impact to the budget when providing disability accommodations. Business lines will also receive the benefits of an employee that is empowered to effectively engage in their work.
- From a Human Resources or Accessibility Office perspective, a centralized cost pool improves capacity to measure the total spend on accommodations and track accommodation costs by type. This data can be leveraged to identify opportunities to scale accommodation solutions, and to also consider how to continually proactively embed accessibility in enterprise practices by continuously engaging in efforts to advance access and inclusion by design.
- All stakeholders benefit from improved accommodation fulfillment time as reasonable accommodations can be provisioned more efficiently.
- All stakeholders benefit from the positive impacts to employee recruitment and retention.
- All stakeholders benefit from improved consistency in accommodation processes.

Determining How to Initially Fund a Centralized Accommodation Fund

- Establishing an initial budget for a centralized accommodation fund can be challenging. An article from the Job Accommodation Network provides data from two companies that share how they established a cost pool. The first company disclosed a centralized fund of \$300,000 for a company of 22,000 employees; this translates to an allocation of \$14 per employee to a centralized fund. The second company projected that 6% of their workforce would require an accommodation and based the initial budget on anticipated volume of requests.
- Companies can pair existing data with existing research to develop an initial budget for a centralized accommodation fund. For example, a company may have metrics on the number of accommodation requests submitted on an annual basis. Similarly, a company may have metrics on the percentage of the workforce that self-identifies as disabled.

- In a similar fashion, a company may have data on the total spend by accommodation type (ie: total spend on interpreting services, CART services, software licenses, etc). This data points can be used to formulate a logical starting point for a centralized accommodation fund.
- [Cost research from the Job Accommodation Network](#) indicates that a high percentage (56%) of accommodations can be implemented at no cost. The rest typically bear a cost of \$500 or less. This research can be paired with data on the total number of accommodation requests or the total number of employees identifying as disabled to form a foundation for initially fund a centralized cost pool.

Additional Considerations for Implementing a Centralized Accommodation Fund

- Commitment from executive/senior leadership is essential to creating a centralized accommodation fund.
- Communication is key to successfully socializing and implementing a centralized accommodation fund. A plan to communicate the need for, and availability of, the fund is vital.
- Benchmarking data is often helpful in building the business case for a centralized accommodation fund and information your company's strategy for creating an initial budget.
- Defining what costs are covered – and what costs are not covered – by the centralized accommodation fund is important to successful implementation.
- After consensus is achieved, additional work remains when standing up a centralized accommodation fund. Plans should also address strategies for:
 - Approving expenditures to the fund
 - Addressing budget overages and shortfalls
 - Bringing visibility to the accommodation fund to managers, employees and candidates
 - Reviewing utilization and monitoring trends to forecast for future annual budgets
 - Establishing strategies for administering and managing the budget
 - Determining how the budget is allocated
 - Establishing relationships with procurement services and/or suppliers to facilitate purchasing goods and services associated with reasonable accommodations

Benchmarking

The following companies report utilization of a centralized accommodation fund:

- Aetna
- Booz Allen Hamilton
- EY
- Florida Blue
- Northrop Grumman
- State Street

Additional Resources

- Job Accommodation Network [Best Practices in Establishing A Centralized Accommodation Fund](#)
- Employer Assistance and Resource Network on Disability Inclusion [Centralized Accommodation Programs \(CAP\) in Practice](#)

- Disability:IN [Centralized Accommodations Funds](#)

Third Party Providers Considerations

Pros:

- Time away accommodations streamlining if the 3rd party vendor also manages the leave program
- Can break out the medical documentation portion for a third party to service, including the recommendation, and then send to the employer for negotiation/implementation
- Reduce headcount (but not cost)

Cons:

- Not cost effective compared to internal group
- Usually will only handle one piece of process – gathering medical and making the recommendation to the HR rep at the company, who then does the interactive process with the EE, Mgr, and implements the accommodation.
- Usually will want more than just an accommodations program to manager (combine with leaves, benefits, etc)
- Staffing level and experience can be subpar; must ensure in the contract specifically
- If fully outsourced, may have gaps for reporting, internal required partnerships (ER), not following policy, not understanding each line of business,
- Increased risk (legal/financial/operational/reputational)
- Inability to provide information timely for internal requests

Considerations for TSA Contracts:

- Must include performance guarantee
- Must include Service Level Agreements (SLA's)
- Must have a way to audit cases on a regular basis]
- Reporting must be provided
- Must include technological feed of EE data to go back and forth

Accommodations Program Sample Outline

Making a Case for a Program

In order to be in compliance with regulatory requirements under the Americans with Disabilities Act and related state and local laws, a formal accommodations program should be considered. The below is a high-level outline for a sample program.

Program

1. Open to all employees, job applicants, temporary employees (agency/supplier affiliation; agency receives medical directly)
2. Have an HR case management system that specifically tracks accommodation requests and their outcomes for reporting and metrics
3. Have solid guidelines and SLA's that meet timeliness requirements under the ADA. Generally, no more than 10 days from request to implementation of accommodation whenever possible.
4. Unable to accommodate should rarely be considered given the high threshold, but may depend on your specific employee headcount; hardship should largely rely on impact to an essential function of the position, or against a regulatory policy.
5. Medical documentation can be procured in process only when appropriate (cannot ask if an apparent disability); additionally medical condition should not be requested as in many states it is not lawful. Focus is on functional limitations.
6. Centralized fund to pay for all accommodation costs.
7. Strong partnerships set in the process with internal and external providers for equipment, including ASL interpreters, ergonomic furniture, assistive technology, etc. with understanding of timeliness and priority requirements for accommodation requests.

Process Steps

1. Request received
2. Interactive process via telephone with requestor
3. If requestor was not employee, telephone call with employee for interactive process
4. Receive medical documentation and verification
5. Review all potential options for employee based on medical indications
6. Conversation with employee to confirm alignment of medical recommendation and employer-suggested other recommendations, with their request
7. Telephone conversation with employee's manager for approval of accommodation
8. If approved, implementation of accommodation
9. If not approved, risk assessment and education of manager for reconsideration, other options that may be viable

10. If still not approved, job search for employee implemented
11. Confirm accommodation is working for the employee within first two weeks, close case
12. Can set up a proactive program to have a recheck with employees on an annual basis of how their accommodation is working, as well as if the accommodation expires as a reminder.

Structure

An accommodations management program can be aligned within a variety of areas within an organization. The decision of where it is placed is governed by the business itself. Listed below are common areas in a business where accommodations programs often reside.

1. Human Resources
 - Employee Relations
 - Leave Management
 - Benefits Management
2. Risk and Compliance Management
3. DE&I

Staffing

Staffing is the most intensive resource area needed for a program. The number of staff needed will be based on the estimated number of cases.

1. Staffing should consist of analyst/consultant position titles for the case management portion
2. Case volume should be no more than 40 active cases per consultant. (Note: need explanation to expand on this). Also, should be thinking about average age of a case. Also need to add something about the medical documentation requirement and how to manage this.
3. Consultants must have extensive knowledge of multiple accommodation types as well as medical limitations to make reasonable accommodation recommendations beyond what the health care provider may recommended.
4. There should be one manager per 8-10 staff.
5. Senior level consultants can take the more complex cases and provide support/mentoring to other staff.
6. For a small organization, an employee relations consultant can often also manage accommodations cases.
7. In a large organization, the medical documentation collection and other administrative areas can be broken out to specialist titles, so that consultants time is focused on the interactive process and case management.

Funding

A centralized fund to pay for accommodations should be developed as part of the program. See section above.

Sample Job Description

- Analyze cases and present recommendations for resolving complex employee accommodation requests for all employees and with all levels of management
- Exercise independent judgment while leveraging, and continuing to develop, expertise in accommodations policies, procedures, and compliance requirements
- Collaborate and consult with human resources colleagues, internal partners, and managers to provide guidance, coaching, feedback, and recommendations related to accommodations issues
- Educate managers and partners on the accommodations process and its relation to ADAAA and other federal regulations, state statutes and local ordinances

Minimum Requirements

- 2+ years of accommodations consulting experience with employee accommodations
- 4+ years of employee relations consulting experience
- Knowledge and understanding of Americans with Disabilities Act (ADA) specifications and practices including specific experience related to employee accommodations
- Knowledge and understanding of disability management, return-to-work strategies, ADAAA and related state and local statutes
- Knowledge and understanding of workforce policies, employee relations, FMLA, Workers' Compensation, and/or ergonomics
- Experience interacting positively with difficult or irate customers
- Ability to exercise independent judgment to identify and resolve problems
- Ability to interact with a diverse team
- Excellent verbal, written, and interpersonal communication skills
- Solid conflict management and decision-making skills
- Solid critical thinking skills
- Solid negotiation skills
- Strong collaboration and partnering skills
- Strong organizational, multi-tasking, and prioritizing skills

Optional requirements

- Certified Professional in Disability Management (CPDM)
- Senior Professional Human Resource Professional Certification (SPHR)

Reasonable Accommodation Resources

Job Accommodation Network (JAN) <https://askjan.org>

JAN provides free consulting services for all employers, regardless of size or type (e.g., private, federal, state, or local government, etc.). Services include individualized consultation about all aspects of job accommodations, including the accommodation process, accommodation ideas, product vendors, referral to other resources, and Americans with Disabilities Act (ADA) compliance assistance.

Employers can access JAN services in a variety of ways:

- [Telephone](#)
- [Email](#)
- [JAN on Demand](#)
- [Live Chat](#)

Cornell University Yang-Tan Institute on Employment and Disability

<https://yti.cornell.edu/work/just-in-time-disability-toolkit>

- **Just-in-Time Toolkit for Managers:** The Just-in-Time Toolkit for Managers helps an organization develop a culture for people to feel safe identifying their disability to managers, allowing all employees to have the potential to contribute fully to the organization's goals. This toolkit prepares managers to support employees around disability disclosure, reasonable accommodation, and performance management.

ADA National Network <https://adata.org/national-network>

Funded by the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR), the network consists of 10 Regional ADA Centers located throughout the United States and an ADA Knowledge Translation Center (ADAKTC).

Each Regional ADA Center focuses on its region's unique needs. This regional focus is critical to ensuring that ADA National Network services meet the needs of a diversity of populations and stakeholders throughout the country.

ADA specialists in each of the ten Regional ADA Centers provide information and guidance to anyone requesting ADA information through 1-800 calls, emails, and in-person consultations. ADA specialists address complex questions on a wide range of ADA topics such as reasonable accommodations at work, building codes for new construction projects, accessible housing, and transitioning from school to work.

The Council of State Vocational Rehabilitation Administrators <https://www.csavr.org>

The Council of State Administrators of Vocational Rehabilitation is composed of the chief administrators of the public rehabilitation agencies serving individuals with physical and mental disabilities in the States, District of Columbia, and the territories.

Procure Access <https://disabilityin.org/procurementtoolkit>

Procure Access is a business-to-business initiative facilitated by Disability:IN and a new component of the Disability:IN Digital Accessibility Program. It brings together companies that recognize the importance of buying and selling technology that is accessible to people with disabilities. Accessible procurement is multi-faceted, requiring the work, commitment, and attention of many aspects of an organization. These include design, development, procurement, training, testing, quality assurance, legal and compliance, HR, communications, learning and development, and more. This work is based on applicable global accessibility laws, regulations, and standards, including the Web Content Accessibility Guidelines (WCAG), 2.1 Level AA and subsequent WCAG updates.

PEATWORKS <https://www.peatworks.org/>

PEATs mission is to foster collaborations in the technology space that build inclusive workplaces for people with disabilities. Their vision is a future where new and emerging technologies are accessible to the workforce by design.

Commonly Requested Workplace Adjustments

- Modifying schedules or allowing flex time and/or remote work.
- Making the workplace or workstation accessible for someone returning to work with a change in mobility or range of motion.
- Modifying or creating policies enabling a person to bring their service animal into the workplace.
- Assistive technology such as screen readers for someone who is blind.
- Purchasing a service for someone who is deaf and requires an interpreter, closed captioning, phone with captioning, and/or computer aided transcriptions.
- Restructuring a job for someone on the autism spectrum where a minor portion of the job requires strong communications skills.
- Adjusting the work location to one with fewer distractions for individuals with attention, learning, or other conditions that are aggravated by noise and interruptions.
- Reassignment to another position for someone whose disability has caused them to be unable to perform the essential functions of their current job.
- Adjusting the supervisory method to enhance productive communication.
- Ensuring effective means of communication for individuals with hearing loss or safe means of egress for individuals with mobility impairments during emergency evacuation process.

American Sign Language Resources

Inclusive Communication Services www.ICSIinterpreting.com

Sign Language Interpreting Professionals LLC www.slipasl.com

Versatile Interpreting Services LLC www.visterps.com - Deaf-owned and Deaf-run interpreting agency in Wisconsin, providing Sign Language Interpreting Services, Translation Services, Remote Interpreting Services, Advocacy, Skills Advancement Program and Workshops/Trainings.

Captioning Resources

Caption First www.captionfirst.com Real-time captioning, CART, post-production captioning, transcription of audio and video files. ASL interpreting services.

Service Dog Guidelines [Service Dog Accommodation Checklist & Ownership](#)

Assistive Technology

- **Dragon Naturally Speaking** – Speech to text software to type and read what is said real time
- **JAWS** – Screen Reader Software with text to speech output
- **ZoomText** – Software that magnifies the screen, changes color contrast and makes it easier to follow the cursor
- **LiveScribe Echo Smart Pen** – Synchronized notes and audio
- **AVA** – State-of-the-Art Live captioning solution for any situation <https://www.ava.me>
- **AIRA** – Aira is an app-based service for people who are blind or have low vision, that provides visual interpretation by trained Agents for just about any task, safely and securely, on your terms. <https://aira.io>
- **Purple VRS (or Sorenson)** – On-demand Remote American Sign Language (ASL) Interpreter facilitates communication between deaf or hard-of hearing persons and hearing persons through a mobile device <https://www.zvrs.com>
- **ReadWrite** - Literacy software, used by employees with dyslexia and reading and writing difficulties <https://www.texthelp.com>
- **Nuance Dragon USB Headset** – Headset compatible with the Dragon Software
- **Digital Accessibility Services** – The Paciello Group <https://www.tpgi.com>
- **Disability Answer Desk** – <https://www.microsoft.com/en-us/accessibility?rtc=1>
- **Physical Accessibility** – [Accessibility Assessment for Facilities & Parking](#)
- **Portable Digital Magnifier**
- **Eyedaptic** – Offers glasses to enhance vision for those who suffer from age-related macular degeneration and other low vision diseases.
- **OrCam MyEyes** – Wearable artificial intelligence device for people who are blind or visually impaired, enabling them to independently access the world, read text from any surface, recognize faces, identify colors and more. **OrCam Read** – For people with reading difficulties, including dyslexia
- **Braille Display Devices** – A braille display is a device that a screenreader user can sync with a computer, tablet or phone that displays tactile braille characters when the screenreader user navigates the screen.
- **Anti-Blue Light Monitor/Anti-Blue Light Screen Filter**

- **Blue Light Blocking Glasses**
- **Sit-Stand Workstations**
- **Ergonomic Chair**
- **Ergonomic Mouse (Logitech MX Vertical Mouse)/(Microsoft Airtouch Mouse)/(Roller Mouse)(Trackball)**
- **Joystick**
- **Touchpad and Touch Screen**
- **Head Mouse** – The HeadMouse has a wireless optical sensor which tracks a tiny disposable target worn by the user on her/his forehead, glasses or even a hat. Move your head and the mouse pointer follows along.
- **Tap Strap 2** – Allows keyboarding and mousing to be done with finger tips and hand gestures.
- **Microsoft Ergonomic Keyboard**
- **One Handed Keyboard**
- **SW Unlimited LLC** www.swunlimited.com – Sale of assistive technologies & computer equipment, peripherals, and office equipment. Installation, training, maintenance of computer equipment and assistive technology training. Service visually impaired disabled vets.

FAQs

Note: Be sure to obtain approval on these FAQs from HR and Legal before distributing them within your organization. You may want to add others, based on specific experience in your workplace.

Q: Is there a centralized budget for accommodations to offset the financial impact on smaller departments? If so, how do we access these funds?

A: *[Note: Creating a centralized budget for reasonable accommodations and communicating its existence is a best practice. Establishing this budget and making it known reduces the likelihood that a manager would be disinclined to provide an RA because it could have an unanticipated impact on their department budget.]*

Q: How should I counsel a hiring manager who asks if a candidate was referred to us by an organization that serves people with disabilities? Can the manager ask about the nature of the individual's disability?

A: No, it is neither legal nor appropriate to inquire about the nature of an individual's disability if that candidate is referred by an organization that serves people with disabilities. This question is akin to asking people of color about their national origins. The conversation should focus on the essential duties of the job; the hiring manager can use a behavioral interview approach to ask a candidate about prior experience performing those duties, including how the person would go about getting the work done.

If candidates choose to disclose details regarding their disabilities, you can thank them for their candor and use the opportunity to reaffirm [ORGANIZATION]'s commitment to including people with disabilities in the workforce. You can also indicate that, if they are selected, they will be given information about the RA process, in case it would be useful. You should also ask them if they would like to request an accommodation during the interview and selection process. (e.g., accessible parking and building access, telecommunications support during phone interviews, large print materials).

Q: What if an employee contacts HR, saying they have a friend/relative with a disability who has been unable to find a job? Where should they be referred to learn about whether we might have a job that matches their skills and experience?

A: [ORGANIZATION] welcomes candidate referrals, including people with disabilities. [ORGANIZATION]'s career web page is the best place to refer employees who want to know about current openings. On rare occasions, hiring managers may be open to conducting an exploratory interview—a general conversation with a candidate regarding his/her skills and interests and the associated positions the organization typically has to offer. This conversation is not the same as an interview for an open position, and it should be made clear to the individual that the discussion is for exploratory purposes only. To be considered for any job openings, the person would need to follow the normal application procedure.

Q: What about colleagues who ask for advice and who are concerned about potentially saying the wrong thing to someone with a disability? Is there some kind of etiquette resource available?

A: Disability:IN has excellent training resources covering disability etiquette, awareness, inclusion and accessibility. You are encouraged to ask a member of the team about what is available depending on the type of Corporate Partner membership your organization has secured.

Q: A manager said, “I hired a person with a disability once, and it did not work out. I do not want to go through that experience again. Why should I take another chance?” How should I counsel him?

A: Ask the manager to replace the words “person with a disability” with “woman,” “person of color,” or another under-represented group, and ask if that statement would be fair, accurate or acceptable. While a prior experience may have made a lasting impression, it should not be used to make generalizations about a person who shares similar demographic characteristics. Each person and situation is unique, when you have met one person with a disability, you have met that one person and they do not represent the overall talent pool of people with disabilities.

Q: A manager says she suspects that an employee’s performance issue is related to a disability? What should I counsel her to say to the employee?

A: After clearly stating the nature of the performance issue, the manager should indicate the range of resources she and [ORGANIZATION] can make available, which may include: internal learning and development programs, tuition reimbursement, 1:1 coaching, Employee Assistance Program, and workplace accommodations. Managers should review each of these resources during any performance management conversations, whether or not they suspect the person has a disability. By making this a regular habit, the manager will be assured these resources are well known and more likely to be utilized when needed.

Q: How should I respond to an employee’s concern that a colleague with a disability is receiving “special treatment” and/or making his job more difficult because he has to help the person?

A: Start by making sure you understand what’s driving the concern so you can determine how best to address the problem. What’s the issue? Workload? A particular task? Perceptions of favoritism? An interpersonal conflict with the employee who has received an accommodation?

At some point in your conversation with the concerned employee, be sure to reiterate [ORGANIZATION]’s commitment to fully including people with disabilities and state that this commitment is driven both by legal requirements and the values of the organization. Be sure to maintain confidentiality by avoiding any discussion about the circumstances, diagnosis, nature of accommodation, or other details associated with the employee with the disability. If asked directly, you must state that this information is confidential.

After your conversation, send a follow-up email with a brief summary of the conversation and a link to the non-discrimination policy and RA procedures to the employee who raised the concern. Thank the

person sincerely for coming forward and being candid about the concern. Refocus the conversation on what the person raising the concern may be wanting or needing to safely and comfortably perform their job duties. Then follow up with the employee again in a few weeks to see if further discussion or explanation of the RA process is necessary.

Q: How should I counsel a hiring manager who asks a candidate what kinds of accommodations the person would need to perform the essential duties of the job?

A: Generally, the hiring manager should wait until after the offer is extended and accepted to engage in this conversation. In the interview process, the focus of the conversation should be about the essential duties of the job and include behavior-based questions about how the individual would perform those duties. If the employee chooses to share what types of accommodations they would need if they were hired, the manager may thank them for this information and let the candidate know that if they are selected for the position the organization will be happy to collaborate with them to identify whatever accommodations are needed.

Q: What should I say to a manager who hasn't documented the essential duties of a job she's recruiting for?

A: Encourage the manager to create a detailed job description. If one is not readily available, you can ask the manager to complete the Reasonable Accommodation Evaluation Form (see Appendix) and add the information to the job description. The form covers the types of information most candidates for office-based jobs need to determine whether they might need an accommodation. If the position is not office based, the hiring manager should use forms available through OSHA to document the job requirements.

Q: What should I tell a manager to do if a person with a disability turns out to be a poor performer? What are options?

A: An employee with a disability is subject to the same performance standards as an employee who does not have a disability. Managers have an obligation to provide direct and specific feedback about any performance issues/concerns regarding the essential duties of the job. As part of this feedback, the manager should offer the list of available resources, which may include: internal learning and development programs, tuition reimbursement, 1:1 coaching, Employee Assistance Program, and workplace accommodations. [ORGANIZATION]'s performance improvement process should be applied and clearly communicated to the employee. In general, it is a good practice when learning about the need for an accommodation during a performance management discussion to suspend the performance improvement process until the accommodation is in place. If performance improves and meets the required standards after the accommodation is implemented, it is recommended that the prior performance improvement documentation be set aside.

Note: Due to stigma associated with identifying as a person with a disability, it is not uncommon for a disability to be disclosed when a performance concern is identified and the person therefore feels compelled to disclose their condition and request an accommodation. As organizations become more visibly disability inclusive and confident, employees will begin to be more proactive in making their needs known.

Q: A manager says he received a complaint or request from a customer who says she does not want to do business with a [ORGANIZATION] employee who has a disability because it makes her “uncomfortable.” How should I counsel the manager?

A: If the employee’s job performance is satisfactory, and the only issue is the customer’s discomfort, encourage the manager to inform her about [ORGANIZATION]’s commitment to fully including people with disabilities, as well as other diverse employees in the workforce. You should make it very clear that the company will not consider changing roles or responsibilities based solely on a customer expressing discomfort with some dimension of human difference.

Employee Communication

Note: Be sure to obtain approval from HR and Legal before including any of the following information in employee communication materials.

Reasonable Accommodation

[ORGANIZATION] is committed to providing qualified job candidates and employees who have disabilities with reasonable accommodations upon request, unless the accommodation would pose an undue financial and/or operational hardship for [ORGANIZATION].

You may request a reasonable accommodation (RA) to:

- Participate in the job application process
- Perform the essential functions of your job
- Enjoy the benefits and privileges of employment with [ORGANIZATION]

Overview

Requests for an RA can be made verbally or in writing. All requests must be documented on the Reasonable Accommodation Request Form. If an initial request is made verbally, the individual should then complete the Request Form. If necessary, a family member, health professional or other representative acting on your behalf may make a request (e.g., notifying HR that you are hospitalized and an expected return-to-work date, a request for interpretive services). The Reasonable Accommodation Coordinator (RAC) handles all requests.

The RA process at [ORGANIZATION] is an interactive one that involves the mutual sharing of information and ideas between you, your manager and the RAC. “Interactive” is characterized by direct, candid and mutually cooperative communication that helps the RAC make a well-considered and informed decision to either grant or deny the RA request.

Note: It is a violation of [ORGANIZATION]’s policies to discriminate or retaliate against qualified job candidates or employees because they need, or may need, a reasonable accommodation for a disability. Violations of this policy may be subject to disciplinary action.

Important Definitions

The definitions of these terms are important to the RA process:

Disability – A person with physical, medical, mental or psychological impairment; or a history or record of such an impairment; or being regarded as having such an impairment. (Note: This definition is specified under the Americans with Disabilities Act of 1990.)

Essential Functions – Duties that are fundamental to a position that the individual holds or desires that he/she cannot do the job without performing them. A function can be “essential” if, among other things:

- The position exists specifically to perform that function
- Only a limited number of employees are available to perform the function
- The function is so specialized and the individual is hired based on their ability to perform the function
- The function cannot be delegated.

Evidence of what constitutes an essential function may include, but is not limited to: RAC's judgment; written job descriptions; the amount and/or proportion of time spend performing the function; the consequences of not requiring a function; and the work experience of incumbents.

Reasonable Accommodation (RA) – A change or adjustment that enables a person with a disability to apply for a job, perform job duties, or enjoy the benefits and privileges of employment that are equitable to those enjoyed by similarly situated employees without disabilities. The change/adjustment promotes equal employment opportunity for an individual with a disability.

There are three categories of RAs:

1. Modification or adjustments to a job application and selection process to permit an individual with a disability to be considered for a job (e.g., providing application forms in alternative formats like large print or Braille, providing a sign language interpreter, or allowing extra time to take a test)
2. Modifications or adjustments to enable a qualified individual with a disability to perform the essential functions of the job (e.g., providing phone amplification, computer screen magnification, screen reader or a flexible work arrangement)
3. Modifications or adjustments that enable employees with disabilities to enjoy equal benefits and privileges of employment (e.g., ensuring training or special events hosted by [ORGANIZATION] are held in locations that are physically accessible, making the cafeteria more accessible, and accommodating employees during training programs and presentations).

Fulfilling Requests

If there is more than one possible accommodation, [ORGANIZATION] will give primary consideration to your preference. The RAC does have discretion, however, to choose among various accommodations that enable you to perform the essential job functions. If a different accommodation is granted, the RAC should document the rationale for the alternative selection as part of the recordkeeping process and follow up to see if the accommodation is meeting the identified need to everyone's satisfaction.

As a general rule, the decision on an RA request is made within 10 business days. If the RA cannot be completed within a 10-day period, you and your manager will be given written notification that documents the delay, reason (e.g., extenuating circumstances such a delay in acquiring necessary equipment), and expected timing for completing the process.

Verifying Disabilities

When a disability or the need for an accommodation is not obvious, [ORGANIZATION] may ask you for reasonable documentation about your disability and related functional limitations. [ORGANIZATION] may require only the documentation that is needed to establish that you have a disability, and that the disability necessitates a reasonable accommodation. Such documentation may include:

- Nature, and duration of the impairment (e.g., functional limitations, side effects of any treatments.
- Types of activities the impairment limits such as restrictions on tasks performed such as lifting, walking, standing, etc.)
- Extent of the limitations (may only lift up to 20 lbs, may only stand for 15 minutes, requires large print, etc.)
- Why the individual requires an accommodation—either in general or a specific type—and how the RA will assist the individual to apply for a job, perform the essential functions of the job, or enjoy a benefit of the workplace.

In limited circumstances, medical examinations or more detailed medical documentation may be needed to determine whether you can perform the essential functions of the job and what accommodations may be appropriate.

Confidentiality of Medical Information

All [ORGANIZATION] personnel are required to respect employee confidentiality. Your request for an RA and all steps taken to review the request and provide any accommodation will be treated as a confidential matter. Information will be disclosed only on a need-to-know basis.

When you request an accommodation, all documentation and information concerning your medical condition or medical history must be collected on forms separate from other personnel-related forms and maintained in separate medical files. The information will be treated as confidential medical records.

Medical information may be provided to: *{Note to employer: Please verify with your legal adviser}*

- Supervisors/managers who need to be informed about work restrictions or reasonable accommodations
- First-aid and safety personnel who need to be informed if the disability requires emergency treatment
- Government compliance officials
- Workers' compensation offices that need information as required by law
- Insurance providers who may require information such information
- Other [ORGANIZATION] authorized personnel who need to be consulted in order to identify, obtain and install the accommodation solution.

What Accommodations Are Reasonable?

The reasonableness of an accommodation depends upon the circumstances of each case. Examples of reasonable accommodations include, but are not limited to, the following:

- Making facilities accessible to and usable by people with disabilities
- Restructuring jobs
- Modifying work schedules
- Providing or modifying equipment, devices or materials
- Providing qualified readers, interpreters, or other support services during the application, interview, and testing processes, and during training and other employment-related activities, including social functions.
- Changing workplace practices (e.g., emergency evacuation procedures or security requirements for nearby parking)
- Providing leave of absence
- Arranging for transfer or reassignment to a vacant position.

Personal Items

[ORGANIZATION] is not required to provide personal items that you need both on and off the job, such as hearing aids, prosthetic limbs, wheelchairs, or eyeglasses. Such items may, however, constitute an RA where they are specifically designed to meet job-related—not personal—needs. One example would be eyeglasses that enable you to view a computer monitor, which you may not need outside the office.

RAs may also include permitting you to use aids or services that the employer is not otherwise required to provide. For example, while [ORGANIZATION] may not provide you with a motorized scooter, it might make a reasonable accommodation so you have a place on site to store the scooter.

Undue Hardship

An accommodation is not a reasonable accommodation if it imposes an undue hardship for [ORGANIZATION]. An undue hardship may exist when an accommodation is significantly difficult, unduly costly, extensive, substantial, or disruptive, or would change the nature or operation of the business.

Denial of an RA Request

If you and the RAC cannot agree on an accommodation that is effective and does not impose an undue hardship, the request denial will be documented on a Reasonable Accommodation Denial Form. Examples of why a request might be denied include: inadequate medical documentation to establish that the individual has a disability or needs an RA; the requested accommodation would not be effective; or the accommodation would pose an undue hardship for [ORGANIZATION]).

You may appeal a denied RA request within 10 business days of the denial. [Note: Describe your appeals process here.]

Reassignment

If no effective accommodation will allow you to perform the essential functions of the job, a job reassignment may be the “last resort.” [ORGANIZATION] is under no obligation to create a new position or move other employees from their jobs in order to create a vacancy for you. Reassignment may be made only to a vacant position and when you meet the job qualifications.

Reasonable Accommodation (Disability) Request Form

This form and all medical information must be kept confidential.

APPLICANT/EMPLOYEE INFORMATION		
Name		<input type="checkbox"/> Job Applicant <input type="checkbox"/> Current Employee
Address		Phone Number
EMPLOYEE INFORMATION (Complete this section if you are an employee even if you are currently on leave)		
Job Title		Office Location
Office Telephone Number	Division/Business Unit	Supervisor/Manager
Email Address		
APPLICANT INFORMATION (Complete this section only if you are a job applicant)		
Position /Title Applied for		Division/Unit (if known)
Location of Position (if known)		
Part(s) of employment process for which an accommodation is requested		
<input type="checkbox"/> Job Application	Job Requisition Number (if known): _____	
<input type="checkbox"/> Assessment Tool	Date: _____	
<input type="checkbox"/> Interview	Interview Date: _____	
<input type="checkbox"/> Appointment		
<input type="checkbox"/> Other (please specify): _____		
Organization Contact Person (if known)		Phone Number
REASONABLE ACCOMMODATION REQUESTED:		
Identify the limitation, which requires accommodation. Be specific: E.G., "May not lift over 25 pounds for six months." "Access required to accessible restroom." "Need extra time to take pre-employment exam." "Need all interviews in one location." (Attach an additional sheet of paper, if		

necessary.)

Is your disability On going Temporary Unknown
If temporary, Anticipated Date RA no longer needed:

Describe the nature of reasonable accommodation requested (Attach additional sheets and present supporting documentation as appropriate)

If equipment is requested, please specify brand, model number and vendor, if known.

Specify how the accommodation will assist you perform the essential functions of the position held or desired. (Attach an additional sheet of paper if necessary.)

Verification by a health professional for your reasonable Accommodation must meet the following criteria:

1. Documentation must provide the nature of the disability and include a medical recommendation for a specific reasonable accommodation. (e.g., Visual, hearing, mobility, neurological, learning, etc.)
2. The documentation must be written on the official letterhead or other organizational form of the qualified health professional or reasonable accommodation subject matter expert.
3. The health professional's credentials must be identified.
4. The documentation must be dated and signed.
5. Describe the limitations only in relationship to the job, and state whether the disability is on going or temporary. If temporary, specify the date the disability is expected to no longer require an accommodation.
6. If equipment purchase is recommended, please be specific. If work modification is recommended, or restructuring or sharing of specific duties, describe the recommended action, please be specific.

Note: You are responsible for any expense incurred in providing RA documentation.

I certify that I have read the above request, that it is true to the best of my knowledge, information and belief, and that I have read the attached notices concerning my right to file a complaint with federal, state and local civil rights enforcement agencies.

Date

Candidate's/Employee's Signature

Reasonable Accommodation (Disability) Request

Record of Action

FOR USE BY HR REASONABLE ACCOMMODATIONS COORDINATOR	
Name of Applicant/Employee:	Telephone Number
Address:	
Request Number	Received by:
Date Received:	Time Received:
Method of Notifying <input type="checkbox"/> In Person <input type="checkbox"/> Phone <input type="checkbox"/> Mail <input type="checkbox"/> E-mail	
DOCUMENTATION OF STEPS TAKEN TO CONSIDER REQUEST	
DATE	COMMENTS
RESOLUTION	
<input type="checkbox"/> Granted	Type of Accommodation Granted: <input type="checkbox"/> As requested <input type="checkbox"/> Different from what was requested
Date:	Give specifics:
<input type="checkbox"/> Denied	Reason for Denial:
Date:	
Date when letter granting or denying the requested accommodation was sent:	
FOLLOW UP	
Request Granted:	
Follow up with requestor after implementation if accommodation provided is satisfactory: <input type="checkbox"/> Yes	
<input type="checkbox"/> No	
Date of follow up:	

Organization Signature: _____ **Date:** _____

Authorization for Release of Medical Information

I, _____

(First Name)	(Middle Initial)	Last Name
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(Address – Number, Street, City, State and Zip Code)

Do hereby authorize:

(Name of person releasing information)

(Organization releasing information)

(Address – Number, Street, City, State and Zip Code)

To release to [ORGANIZATION] medical information pertinent to the reasonable accommodation requested in the attached document.

To any licensed physician, other licensed practitioner, Reasonable Accommodation Subject Matter Expert, hospital, clinic, or other medically related facility or United States Veteran Administration: I authorize you to release to [ORGANIZATION] medical information to be used solely for the purpose of evaluating my request for a reasonable accommodation. This authorization shall be valid for a period of 90 days after the date of my signature or earlier if revoked by me in writing to [ORGANIZATION]. I hereby acknowledge that I have been informed of my right to receive a copy of this authorization request. I further acknowledge that I have been informed that if the medical information contained herein is not released, my reasonable accommodation may be denied.

Printed Name	Employee Signature
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Date

Reasonable Accommodation Evaluation and Essential Job Duties Disclosure Form

Instructions

This form should be completed for all open positions. Copies of the completed form will be provided at the time of the interview to all candidates, both internal and external. Please provide this explanation to all candidates:

“As part of our effort to provide reasonable accommodations for people with disabilities, we share this essential job information with all candidates who apply for open positions. If you become the final candidate chosen for this position, we will provide you with an opportunity to request any reasonable accommodations you might need at the time an offer is made.”

Guidance for Hiring Managers

When extending job offers, ask the new employees-to-be whether or not [ORGANIZATION] can provide them with any reasonable accommodations. If they decline, encourage them to ask you (as the hiring manager) or their HR representative for such an accommodation if they ever need one in the future. Have them sign the form acknowledging they have had an opportunity to discuss this matter with you, and give the signed form to your RAC.

If the candidate or employee requests an accommodation, record the details of the request separately on the Reasonable Accommodation Request Form.

If you and the candidate are not sure what, if any, accommodations might be needed, consult with the RAC for advice and resources.

Reasonable Accommodation Evaluation Form

Job duties Information for informing the reasonable accommodation process

Job Title:	Requisition Number:
HR Contact:	Telephone:

I. ESSENTIAL JOB ACTIVITIES					
A. TRAVEL (Check each that applies) FACTORS (Please circle as appropriate. See instruction sheet for definitions)					
		Importance		Time Spent	
<input type="checkbox"/>	Intercampus	3	2	1	0
<input type="checkbox"/>	Offsite – Local	3	2	1	0
<input type="checkbox"/>	US/Domestic	3	2	1	0
<input type="checkbox"/>	International	3	2	1	0
B. Meetings (Check each that applies)					
		Importance		Time Spent	
<input type="checkbox"/>	Same Building	3	2	1	0
<input type="checkbox"/>	Campus	3	2	1	0
<input type="checkbox"/>	Offsite – Local	3	2	1	0
<input type="checkbox"/>	US/Domestic	3	2	1	0
<input type="checkbox"/>	International	3	2	1	0
C. Equipment/Lifting (Please note percentage of time equipment is used as part of job)					
		Heavy 100%	Moderate 50%	Light 25%	None 0%
	Computer	3	2	1	0
	Telephone	3	2	1	0
	Printer	3	2	1	0
	Lifting (_____ lbs.)	3	2	1	0
Comments					

II. JOB SITE INFORMATION			
A. WHEELCHAIR ACCESSIBILITY (Please check one)			
	Wheelchair Accessible	Not Currently Wheelchair Accessible	
Restroom	<input type="checkbox"/>	<input type="checkbox"/>	
Building Entrance	<input type="checkbox"/>	<input type="checkbox"/>	
Cafeteria	<input type="checkbox"/>	<input type="checkbox"/>	
Office Space	<input type="checkbox"/>	<input type="checkbox"/>	
Other	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:			
B. ON-SITE REQUIREMENTS (This job requires the incumbent to be on site.)			
<input type="checkbox"/>	40 + hours	<input type="checkbox"/>	Part-Time available, # of hours
<input type="checkbox"/>	Flex-time available (start/end times for work day)	<input type="checkbox"/>	Telecommuting available
<input type="checkbox"/>	Other (Please explain)		
C. SUPPORT STAFF/SERVICES AVAILABLE (Please indicate availability for this job)			
	Full Time	Part-Time	Not Available
Admin Clerical Support	3	2	1
Shuttle Van	3	2	1
(lift equipped van available in):			

Comments:

TO BE COMPLETED AT TIME OF HIRE	
New Hire Employee Name (please print):	New Hire: Employee Signature:
Date of Hire:	Hiring Manager:
Reasonable Accommodation Requested: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	HR Manager:
If yes, attach separate sheet(s) summarizing accommodations requested	

Note: [ORGANIZATION keeps a copy and gives one to the candidate.

Sample Persons with Disability Self-Identity Encouragement

[ORGANIZATION] is committed to fully including people with disabilities.

In an effort to enhance our inclusion efforts, we invite our employees to voluntarily self-identify whether they are a person with a disability by including this information in the confidential database managed by our Human Resources department.

At [ORGANIZATION], we believe that by better understanding our employees who have disabilities—whether or not the disability is apparent—we can seize opportunities to provide greater services to our customers. We value the diverse perspectives of our employees with disabilities and continually look for more ways to enable them to contribute to our business goals.

People who have a disability are one of the largest and most diverse populations. In the United States, there are an estimated 54 million people who have a condition that significantly affects one or more of their major life activities. It is estimated that at least 15% of the world population is living with a disability. People with disabilities are found in every type of job and profession and are represented at all socioeconomic levels.

[ORGANIZATION] understands that many people who have a disability, even one that is visible, may choose not to disclose this information. Research by Cornell University has shown that there is generally a fear of being treated differently and having limitations placed on future career opportunities. Those with non-apparent disabilities (e.g., hearing loss, depression, anxiety, dyslexia, traumatic brain injury, heart condition) also share this concern. Please know that in asking you to self-identify, we are not requesting details regarding your diagnosis or any other confidential medical information. We simply want to know what percentage of our workforce has a disability so we can strengthen our inclusion strategies and make it easier for colleagues with disabilities to request any needed accommodations or other forms of support.

At [ORGANIZATION], we strive to foster a safe environment for employees to share their lived experience as a person with a disability. We honor and respect people with disabilities and the value that diverse perspectives and contributions can make to our business goals every day. *We are working to diversify our workforce even more, support all employees in reaching their full potential, and assess whether efforts to recruit and retain individuals with disabilities are proving successful.*

If you have an apparent or non-apparent disability, we invite you to self-identify this information so that we might better understand our workforce and continue investing in ways to foster full inclusion and empowerment for all employees at [ORGANIZATION].

Instructions for Choosing Your Status:

Please go to our confidential site at [LINK], where you will have an opportunity to self-identify your ability status. Once you have entered the information, it will be included as part of your confidential personal information, along with your marital status, dependents, home address, and other information already in the [ORGANIZATION] HR system.

If you have questions about the self-identification process or would like to discuss the definitions of what constitutes a disability in a confidential setting, please contact [NAME].