
Reasonable Accommodation Process Checklist

(with helpful hints along the way)

1. Do you have medical documentation or other reliable, objective information to believe that the employee has an impairment?

- Yes
 No

If yes, go to step 2. 🐦

If no, there is no reason to believe that the employee has an impairment that requires a reasonable accommodation. The process does not begin.

Note: If a supervisor notices a performance problem or other behavior that could be the result of an impairment, the supervisor may ask the employee if there is any way that the supervisor can assist the employee in the performance of the job tasks.

2. Check all that may be answered with a "yes".

- Does the employee have an impairment that substantially limits a major life activity?
 Does the employee have a record of such an impairment?
 Is the employee regarded as having such an impairment?

If the employee has an impairment that is substantially affecting a major life activity, go to step 3. 🐦

If the employee has no physical, mental or sensory impairment or no history of such an impairment, then there is no need for a reasonable accommodation.

Note: Even if the employee has a record of such an impairment, if there are no current restrictions or limitations on a major life activity, then there is no need for an accommodation.

Note: If the employee is regarded as having such an impairment, advise the supervisor that the employee must be treated the same as other employees in all aspects of employment. Only if there is an *observable basis* for believing that the employee has an impairment that is affecting job performance may the supervisor inquire about the need for some on-the-job accommodation.

Definition: "Major life activities" are "those basic activities that the average person in the general population can perform with little or no difficulty." Examples of these activities include: caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, sitting, standing, lifting and reaching.

3. Do you have the medical documentation to substantiate that a disability exists?

- Yes
 No

If you have the necessary medical information, proceed to step 4. 🐦

You need information to substantiate the disability and the requirement of a reasonable accommodation.

1. Be sure to have the employee sign a medical release form before requesting medical information
2. Have the medical provider indicate what major life activity(ies) is limited
3. Keep all medical information in a file that is separate from the employee's personnel file. This information is private.

4. Do you have a current and accurate job description for the employee's position?
- Yes
 - No

If you have a current and accurate job description, proceed to step 5. ➤

The job description must accurately indicate which of the job functions are essential. Non-essential job tasks may be reassigned to other employees for purposes of accommodations, but not essential functions. If you need an updated job description, write one.

5. If you have determined that the employee has a disability and that there may be a reasonable accommodation that would assist the employee in performing the essential functions of the job, have you discussed possible accommodations with the following?
- the employee
 - involved medical providers
 - managers or supervisors who have knowledge of the work site and the job tasks
 - Department of Administration's STAR program (System of Technology to Achieve Results)
 - EAP, if the employee has a psychological disability
 - A vocational or rehabilitational counselor, if the employee has one
6. Would the accommodation create an undue hardship for the employer?
- Yes
 - No

If the answer is no, proceed to step 7. ➤

Note: "Undue hardship" is a result that would be unduly costly, extensive, substantial, disruptive, or would "fundamentally alter the nature or the operation of the business." Most reasonable accommodations cost less than \$1000. Reassignment to another vacant position should be considered only when there is no reasonable accommodation that would enable the individual to perform the essential functions of her/his current position. The employee must be "otherwise qualified" for the reassigned position.

7. Is a contract waiver necessary for the accommodation?
- Yes
 - No

If the answer is no, proceed to step 8. ➤

If the answer is yes, discuss the waiver of the “filling vacancies” or “shift assignment” or other involved provisions of the applicable contract with the labor relations office in your agency.

- 8. Does the employee *currently* create a “direct threat” to her/himself or others in the performance of the job tasks?
 - Yes
 - No

If the answer is no, provide the reasonable accommodation.
If the answer is yes, proceed to step 9. ↘

- 9. Document the direct threat by:
 - Identify the risk caused by the functional limitation

 - Identify the potential, substantial harm that could result

 - Identify the medical and/or observable facts upon which this risk is based

When the documentation is collected, proceed to step 10. ↘

- 10. Will the current direct threat be reduced or eliminated by providing a reasonable accommodation?
 - Yes
Identify the reasonable accommodation _____
 - No. Provide reason that no reasonable accommodation is appropriate

If the answer is yes, provide the reasonable accommodation.
If the answer is no, no accommodation need be provided, as supported by the documentation.