



National Service Inclusion Project

Fact Sheet

Five Practical Tips For Providing and Maintaining Effective Reasonable Accommodations

Why Provide Reasonable Accommodations?

- **Attract Qualified Service Members and Volunteers**
- **Retain Experienced Service Members and Volunteers**
- **Comply with the Americans with Disabilities Act (ADA) and Section 504 of Rehabilitation Act**

There are many reasons for service programs to provide reasonable accommodations for all service members and volunteers. Organizations can attract qualified service members by offering accommodations such as flexible hours, volunteer at home opportunities, position sharing, and regular check-ins. Also, providing such accommodations can help organizations retain an experienced pool of members and volunteers by improving the overall morale of the service program. And finally, providing reasonable accommodations allows organizations to meet their legal obligations under title I of the Americans with Disabilities Act (ADA), Section 504 of Rehabilitation Act and similar state laws.

A recent study conducted by the Job Accommodation Network (JAN) not only confirms the benefits of providing accommodations, but also shows that providing accommodations is not costly. More than half the organizations surveyed reported that there was no cost for providing an accommodation and the remainder reported a typical cost of \$500.*

Although there are many benefits that result from providing reasonable accommodations, some supervisors are not sure how to do so. The following information provides some helpful tips for organizations that want to improve their ability to provide and maintain effective accommodations.

Tip 1. Develop Written Policies and Procedures

Organizations should consider developing written accommodation policies and procedures. Written policies and procedures can help make sure that all service members are aware of the policies and procedures, help insure consistency

when processing accommodation requests, and help document organizations' efforts to provide effective accommodations.

Some things to consider when developing written policies and procedures include:

- **Try to Keep Them Flexible and Simple**

If the goal is to make it easier to provide effective reasonable accommodations, policies and procedures that are overly rigid, technical, or complicated are not very useful. Organizations should try to develop flexible policies and simple procedures when possible.

- **Be Sure to Appoint a Responsible Person or Persons**

Occasionally service members or volunteers request accommodations but no one acts on the request – it gets passed around from one person to another with no one taking responsibility due to the lack of knowledge regarding how this type of request should be handled. Program Staff should decide who will be responsible for implementing and overseeing accommodation policies and procedures. It can be one responsible person, a team, or even individual supervisors or managers – the right approach may vary from program to program, but the important thing is to make someone responsible.

- **Inform Everyone**

Policies and procedures will not be effective unless everyone knows about them. Organizations should make sure to communicate all changes and newly developed policies and procedures to all service members and staff.

Resources:

For managers who want to develop written accommodation policies and procedures, the Equal Employment Opportunity Commission (EEOC), the federal agency that enforces the ADA, provides some useful publications, including:

- Establishing Procedures to Facilitate the Provision of Reasonable Accommodation
http://www.eeoc.gov/policy/docs/accommodation_procedures.html
- EEOC's Internal Accommodation Procedures
http://www.eeoc.gov/policy/docs/accommodation_procedures_eeoc.html

- Practical Advice for Drafting and Implementing Reasonable Accommodation Procedures
http://www.eeoc.gov/federal/implementing_accommodation.html **

Tip 2. Train All Managers and Supervisors to Recognize and Respond to an Accommodation Request

No matter who will actually be responsible for processing accommodation requests, all managers and supervisors need to know how to recognize a request, especially from a service member who might be protected by the ADA and/or Section 504. One of the main reasons employees file complaints under the ADA is that an accommodation request wasn't responded to. The problem is often that a supervisor or manager did not recognize the request. Organizations also need to let managers and supervisors know what to do once a request is received to make sure the request is processed.

In addition to complying with the ADA and Section 504, organizations who want to benefit from providing accommodations for all service members and employees and who develop policies and procedures, will want to make sure the policies and procedures are used effectively. Training everyone how to recognize and respond to a request will help accomplish this.

How?

So, how can supervisors or managers be trained to recognize and respond to accommodation requests? When requesting an accommodation, service members only need to use plain English and do not have to mention the ADA, Section 504 or use legal terminology such as the phrase "reasonable accommodation." In general, all a service member needs to say is that s/he needs "an adjustment or change in service for a reason related to a medical condition." So, any time a service member indicates that a medical condition is causing a problem, a supervisor or manager should treat it as an accommodation request until a definite determination is made. If there is any doubt about whether a request was made, managers and supervisors should consult with the person or persons responsible for accommodations.

In addition to recognizing a request for accommodation, organizations should make sure that all managers and supervisors know the policies and procedures for how accommodation requests will be processed. If the organization appointed a responsible person, that person should be notified immediately. If managers and supervisors are responsible for processing accommodation requests, they should be trained how.

Whatever policies and procedures are in place, service programs should always respond quickly to an accommodation request and keep service members informed about the status of their requests.

Tip 3. Have a Process for Determining Effective Accommodations

Service sites may have difficulty figuring out how to determine effective accommodation options for service members with disabilities. One of the best places to start the process is with the service member who requested the accommodation. Often the member knows what is needed and can suggest effective options.

If the service member does not know what accommodation is needed or if the supervisor wants to explore other options, another good resource is the service member's medical provider. With the service member's permission, the medical provider may be able to provide useful information about the member's limitations and effective accommodation options. The medical provider does NOT need to mention what the disability is or anything medical-related.

If neither the service member nor the medical provider can suggest effective accommodations, supervisors can contact outside resources such as the National Service Inclusion Project (NSIP), JAN or see NSIP's *Fact Sheet: A Sample Process for Determining Effective Accommodation Option*.

Tip 4. Monitor and Update Accommodations

Once you have successfully determined and implemented an accommodation, the accommodation may need to be monitored and periodically updated. For example, if the accommodation involved equipment, the equipment may need periodic maintenance. If the accommodation involved software that interfaces with an existing system, the software may need to be updated as the overall system is updated. If the accommodation involved a new method of doing things, the method may need to be modified as the service changes.

One of the best ways to monitor accommodations is to keep the lines of communication open with service members. Communication is important throughout the accommodation process, including the monitoring stage. Service members need to know that they can revisit an accommodation if needed before performance problems result.

Finally, supervisors may want to document their accommodation efforts. Documentation can be useful for new supervisors or managers or in case a dispute arises between the supervisor and a service member. Keep in mind that

all documentation that contains medical information must be maintained in a confidential manner.

Tip 5. Train New Service Members, Managers and Supervisors

Sometimes a new manager or supervisor decides to change the way things are done. If they do not know about accommodations that are in place, they may make changes that negatively affect these accommodations. While it is okay for a new manager or supervisor to make changes, if an accommodation for a service member with a disability is affected, a new accommodation may be necessary. New managers and supervisors need to be trained on the policies and procedures for reasonable accommodations before a problem occurs. By training new service members about policies, will ensure that accommodation procedures will continue to be effective.

*For additional information on the benefits and costs of accommodation view JAN's Workplace Accommodations: Low Cost, High Impact at <http://www.jan.wvu.edu/media/LowCostHighImpact.doc>

**Additional information can be obtained from JAN's Employers' Practical Guide to Reasonable Accommodation Under the Americans with Disabilities Act (ADA) at <http://www.jan.wvu.edu/Erguide/index.htm>

Adapted from material developed by Job Accommodation Network (JAN), <http://www.jan.wvu.edu/>



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NSIP is the training and technical assistance provider on disability inclusion for the Corporation for National and Community Service.