

The basis for this process is the EEOC Policy on Reasonable Accommodation

**STEP 1: Manager or Supervisor informs HR within 2 business days of their knowledge** that they have become aware of a possible need for accommodation or disability issue because:

- the employee requests an accommodation to perform the essential functions of the job or to gain access to the workplace.
- an applicant with a disability needs an accommodation to have an equal opportunity to compete for a job.
- an employee with a disability needs an accommodation to enjoy equal access to benefits and privileges of employment (e.g., details, trainings, office-sponsored events).
- the manager/supervisor becomes aware of the need for an accommodation through observation or through a third party.
- the manager/supervisor becomes aware of the possible need for an accommodation because the employee with a disability has exhausted workers' compensation leave, CFRA/FMLA leave, or other federal, state or employer covered leave, but the employee or his or her health care provider indicates that further accommodation is still necessary.

**STEP 2: HR initiates interactive process with employee** in a timely manner.

- HR confidentially consults with employee to identify job-related limitations, if any (do not discuss where others may overhear the conversation).
- HR asks employee for reasonable medical documentation of functional limitations from medical provider, unless limitations are obvious or already known (Request completion of Form if needed).  
*NOTE: Under no circumstance should the District ask the employee to disclose the nature of the disability or information on the underlying cause such as unrelated documentation, including, in most circumstances, an employee's complete medical records, because those records may contain information unrelated to the need for accommodation. The supervisor should NEVER speak with the employee's health care provider even if the employee provides permission to the supervisor to do so.*
- If information provided by the employee is unclear, HR identifies the issues that need clarification, specifies what further information is needed, and allows the employee a reasonable time to provide the supplemental information.

**STEP 3: HR works with supervisor to analyze employee's job** to identify essential functions of the job.

- HR reviews the job description with the supervisor to determine which functions are essential to the job and which are non-essential.
- Take notes to confirm that agreement.

**STEP 4: HR meets with supervisor and employee to brainstorm options**

- Using the information provided by the employee's medical provider and the annotated job description, HR meets with both the supervisor and the employee to identify and research possible reasonable accommodations and assess the effectiveness each would have in enabling the

employee to perform the essential functions of the position or to enjoy equivalent benefits and privileges of employment compared to non-disabled employees.

- If reassignment to an alternate position is considered as a possible accommodation, HR may ask the employee to provide information about his or her educational qualifications and work experience that may help HR find a suitable alternative position for the employee.

### STEP 5: HR meets with supervisor to select feasible option

- HR and supervisor should consider the preference of the employee, but the District has the right to implement a reasonable accommodation that is effective in allowing the employee to perform the essential functions of the position.

While there are some things that are not considered reasonable accommodations (e.g., removal of an essential job function or personal use items such as a hearing aid that is needed on and off the job), reasonable accommodations can cover most things that enable an individual to apply for a job, perform a job, or have equal access to the workplace and employee benefits such as kitchens, parking lots, and office events.

Common types of accommodations include:

- modifying work schedules or supervisory methods
- granting breaks or providing leave
- altering how or when job duties are performed
- removing and/or substituting a marginal function
- moving to different office space
- making changes in workplace policies
- providing assistive technology, including information technology and communications equipment or specially designed furniture
- providing a reader or other staff assistant to enable employees to perform their job functions, where the accommodation cannot be provided by current staff (removing an architectural barrier, including reconfiguring work spaces)
- providing accessible parking
- providing materials in alternative formats (e.g., Braille, large print)
- providing a reassignment to another job

### STEP 6: Supervisor and HR meet with employee to discuss implementation steps of selected accommodation

- HR and Supervisor describe the selected Accommodation to the employee, process and specific timeframe for implementation.

### STEP 7: HR completes process and initiates annual review if needed

- HR documents the reasonable accommodation process using the *Interactive Process Record*. HR maintains medical information and/or records obtained during the interactive process on separate forms and in a confidential medical file separate from the employee's personnel file.
- HR checks in with employee and supervisor after implementation to discuss how the accommodation is working for the employee.
- For reasonable accommodations extending beyond one year, HR may ask, on a yearly basis, for medical documents substantiating the need for continued reasonable accommodations.