

## The Six D's Continued

bump an employee from a job in order to create a vacancy; nor does it have to create a new position. Additionally, an employer does not have to provide an employee with a new supervisor as a reasonable accommodation but may require supervisory methods be altered.

### 4. DECISION

Determine the accommodation that will effectively meet the needs of the employee. Oftentimes, equipment may be ordered and services can be provided through the Computer/Electronic Accommodation Program (CAP) at no cost to the activity.  
<http://www.tricare.osd.mil/cap/>

If there are two possible accommodations and one costs more or is more burdensome than the other, the supervisor may choose the less expensive or burdensome accommodation as long as it is effective. Additionally, the supervisor may choose the accommodation that is easier to provide. If more than one accommodation is effective, “the preference of the individual with a disability should be given primary consideration. However, the employer providing the accommodation has the ultimate discretion to choose between effective accommodations.”

### 5. DOCUMENT

Prepare a proposed letter of decision. Summarize the request; detail the proposed accommodation; and include a specific description of the actions being taken. If an alternative accommodation is proposed, include rationale for the decision. Ensure the letter informs the requester of their rights to reconsideration and to initiate an EEO complaint (within 45 calendar days). All decision letters will be reviewed by HR and EEO before being issued to the requester. The deciding official must complete the “Information Reporting Form” and submit it to HR within 10 business days of the decision.

### 6. DEPLOY

Implement the accommodation within a timely manner and monitor to ensure the accommodation is effective. This will take no more than **20 calendar days**. Failure to respond promptly to a RA request may result in a violation of the Rehabilitation Act.

### Confidentiality

Medical documentation submitted in support of any RA will be sealed and maintained in secure storage, separate from Official Personal Files, by HR. Medical documents may be disclosed only to:

- An official involved in determining any subsequent request for RA
- EEO officials
- First aid and safety personnel if the disability might require emergency treatment
- Government officials investigating compliance
- In certain circumstances, workers compensation offices or insurance carriers

Supervisors may not disclose that an employee is receiving a RA because this usually amounts to a disclosure that the individual has a disability. If a coworker inquires about what is perceived to be “special” treatment, point out that many workplace issues are personal and it is our policy to assist any employee encountering difficulties and to respect employee privacy.

# Providing Reasonable Accommodations



## Supervisor's Guide

## The Six D's of RA



## What is a Reasonable Accommodation?

A reasonable accommodation is a change in the work environment or the way things are customarily done that would enable a qualified individual with a disability to enjoy equal employment opportunities.

Examples:

- Making facilities accessible
- Acquiring or modifying equipment
- Providing assistive devices
- Flexible leave schedule
- Part-time or modified work schedule
- Redesign of work space
- Modified work site
- Job restructuring
- Changing tests, training materials or policies
- Providing qualified readers or interpreters
- Reassignment to a vacant position

### The Request

The RA process is initiated when a person with a disability indicates the need for an adjustment or change at work or the application process for a reason related to a medical condition. An employee may initiate a request for RA orally or in writing. The requester does not have to use any particular words or cite the Rehabilitation Act of 1973 or even use the term “reasonable accommodation.”

### The Timeframe

Each RA will be different and will be considered on a case-by-case basis. The supervisor/manager must review the request and issue a written decision to the employee or applicant within **ten (10) business days**. Absent extenuating circumstances, the approved accommodation will be provided within **twenty (20) business days** from the date of receipt of the request..

## THE Six D's of the RA PROCESS

### 1. DISABILITY?

Determine if the individual has a disability as defined by the law. A disability is a mental or physical condition (medical problem) that substantially limits one or more major life functions (caring for self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working). Deciding officials may request medical documentation sufficient to substantiate that the individual has a disability but must not request medical documentation where the disability or need for accommodation are obvious or other wise known, or when the individual has already provided sufficient information. Supervisors can ask the requester for a limited release allowing them to submit a list of specific questions to the health care or vocational professional regarding the nature, severity and duration of the impairment as well as the functional limitations. The Alaska Division of Vocational Rehabilitation is a good resource to assist with this process.

### 2. DISSECT JOB FUNCTIONS

The supervisor will review the job description for accuracy to determine the essential and marginal functions of the position as well as the physical requirements. Essential functions are those job duties that are so fundamental to the position that the individual cannot do the job without being able to perform them. A function is “essential” if, among other things, the position exists specifically to

perform that function; there are a limited number of employees who could perform the function if it were assigned to them; or the function is specialized and the incumbent is hired based on his/her ability to perform it.

### 3. DIALOGUE

Engage in an interactive process of exploring accommodation options with the requester and keep him/her informed of the status of the RA. The goal is to provide an accommodation that is **effective**. Meet, talk, dialogue, discuss, communicate, brainstorm, and explore ideas, options and alternatives. As part of the interactive process, the supervisor may offer suggestions and discuss their effectiveness in removing workplace barriers that impede the individual with a disability. EEO can help with this step if you would like the assistance of a mediator.

Your first RA consideration would be modifications to the work environment or adjustments in how and when a job is performed. The last resort would be to reassign the requester to a vacant position. If it is determined that reassignment is the only effective accommodation, then Human Resource (HR) personnel will assist in determining current and potential vacancies and in matching the requester’s qualifications with a vacancy. For reassignments there are grade and pay considerations. The employer does not have to

### For help contact:

Equal Employment Opportunity Office

EEO Manager ASO (907) 271-3685  
EEO Complaint Manager (907)271-3311  
EEO Specialist, Fairbanks (907) 356-5509