



## River Valley Child Development Services Procedure

Reasonable Accommodations/Accessibility		
<b>Dates Reviewed:</b>	<b>Dates Revised:</b>	<b>Dates Approved by BOD:</b> N/A
<b>Effective Date: 10/12/2022</b>		

River Valley Child Development Services will reasonably accommodate qualified individuals in all business practices. Reasonable accommodations will not be considered if doing so causes a direct threat to the safety of these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to River Valley Child Development Services.

### **Job Applicants**

In accordance with the law, all applicants for positions within River Valley Child Development Services must have accessibility to all steps in the application and hiring processes and are protected from discriminatory questions that could potentially screen them out of the application process.

The request for a reasonable accommodation can occur at any time during the application/hiring process. This request may be in "plain English" and need not mention the ADA or use the phrase "reasonable accommodation." Initial requests for a reasonable accommodation do not need to be in writing. Applicants may request accommodations in conversation or may use any other mode of communication.

Qualified individuals can communicate accommodation questions or requests to any RVCDS employee.

### **Employees**

A qualified individual may request a reasonable accommodation at any time during employment. When a qualified individual or a representative decides to request an accommodation, they must inform their direct supervisor and program director (if applicable) that they need an adjustment or change at work. To request an accommodation, an individual may use "plain English" and need not mention the ADA or use the phrase "reasonable accommodation." Initial requests for reasonable accommodation do not need to be in writing. Individuals may request accommodations in conversation or may use any other mode of communication.

#### **Medical Documentation and Confidentiality for Employees**

If the disability is not obvious and there is no other medical information already on record for the employee, River Valley Child Development Services may require the employee to provide documentation from a physician or other medical professional concerning the existence and extent of the disability.

The employee's medical information will be maintained in a separate confidential file. Any information regarding the employee's condition will only be made available on a need-to-know basis.



## River Valley Child Development Services Procedure

### **Clients/Vendors**

Clients/Vendors may request a reasonable accommodation at any time during their involvement with RVCDS. This request may be in “plain English” and need not mention the ADA or use the phrase “reasonable accommodation.” Requests for a reasonable accommodation do not need to be in writing. Clients/vendors may request accommodations in conversation or may use any other mode of communication. RVCDS employees have a shared responsibility to provide reasonable accommodations requested and seek out additional guidance if needed.

### **Interactive Process for Applicants/Employees**

Determining eligibility for a reasonable accommodation will occur through the process outlined below:

#### Applicants

1. When an employee is made aware of a request for a Reasonable Accommodation, they will contact the Program Director or Assistant Director.
2. When notified of a request, the Program Director will make any necessary reasonable accommodations or contact HR Generalist for assistance.
3. After an accommodation for an applicant has been made, the Program Director will document the request and subsequent action taken on the “Interview Check Off for External Applicants” form and submit to HR Generalist.
4. If an accommodation is made for an applicant who is hired as an employee, the Interactive Process for Employees will be initiated.

#### Employees

1. Employee completes Part 1 of the “Reasonable Accommodation Request Form” and submits to Program Director.
2. Program Director reviews, signs, and makes determination within two business days to approve accommodation request or forward to HR Generalist for completion of Part 2. If the request ends with Program Director approval, “Reasonable Accommodation Request Form” is submitted to HR Generalist immediately after review.
3. Upon receipt of Reasonable Accommodation Request form where Part 2 is required to be completed, HR Generalist will notify the employee in writing that the request has been received and that a decision will be made to approve or deny the request within 20 business days of receipt by HR Generalist, unless there are extenuating circumstances warranting extensions of timeframes.
  - a. Initial consultation with parties involved and review of essential job functions will occur within five business days of receipt by HR Generalist. If eligibility can be determined during initial consultation, a decision will be made immediately.
  - b. If eligibility cannot be determined during the initial consultation, a decision will be made within 20 days of receipt by HR Generalist, unless there are extenuating circumstances warranting extensions of timeframes.
  - c. If extenuating circumstances occur and the employee is unable to obtain requested additional documentation within the established timeframe, it is the employee’s responsibility to notify the HR Generalist.
  - d. If an employee does not provide the information within 15 business days or request an extension, HR Generalist will inform the employee in writing that the information was not received and that the employer is unable to proceed with the accommodation process until the information is received and reviewed.



## River Valley Child Development Services Procedure

4. If eligible, the employees' preference for accommodation will be considered, but River Valley Child Development Services has the right to select among the alternatives available if they are effective.
5. When approved reasonable accommodations require the purchase of item(s), implementation will occur within 15 business days of Step 1 or Step 2 approval.
6. Within 90 days after the accommodations have been provided, the HR Generalist will assess the effectiveness of the accommodations in enabling the employee to perform the essential functions of the job. Additional accommodations or changes to the existing accommodations may be considered.
7. If an approved accommodation needs revised or a different accommodation needs to be put in place, it is the employee's responsibility to complete and submit a new "Reasonable Accommodation Request Form" to the Program Director.

### Definitions

- *Client*: person or business who receives services from RVCDS.
- *Direct threat*: A significant risk to the health, safety, or well-being of individuals with disabilities or others when this risk cannot be eliminated by reasonable accommodation.
- *Disability*: A physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment.
- *Essential job functions*: Term refers to those job activities that are determined by the employer to be essential or core to performing the job; these functions cannot be modified.
- *Plain English*: Clear, straightforward expression; language that a common person can understand
- *Qualified individual*: An individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.
- *Reasonable accommodation*: Includes any changes to the work environment and may include making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part-time or modified work schedules, telecommuting, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.
- *Representative*: A family member, friend, health professional on behalf of an individual with a disability



## River Valley Child Development Services Procedure

- *Undue hardship*: An action requiring significant difficulty or expense by the employer. In determining whether an accommodation would impose an undue hardship on a covered entity, factors to be considered include:
  - The nature and cost of the accommodation.
  - The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation, the number of persons employed at such facility, the effect on expenses and resources, or the impact of such accommodation on the operation of the facility.
  - The overall financial resources of the employer; the size, number, type, and location of facilities.
  - The type of operations of the company, including the composition, structure, and functions of the workforce; administrative or fiscal relationship of the facility involved in making the accommodation to the employer.
- *Vendor*: person or business who provides services to RVCDS.

