



Goodwill Industries of Northwest Ohio, Inc.

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REASONABLE ACCOMMODATION POLICY

I. Reasonable Accommodation Policy

According to the Equal Employment Opportunity Commission's website found at www.eeoc.gov, the Americans with Disabilities Act of 1990 (ADA) requires employers to provide reasonable accommodations for qualified employees with disabilities, unless such accommodations pose an undue hardship (e.g., too costly, too extensive, too substantial, too disruptive).

A reasonable accommodation is any change in the workplace or the way things are customarily done that provides an equal employment opportunity to an individual with a disability. 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
- Removing an architectural barrier, including reconfiguring work spaces
- Providing materials in alternative formats (e.g., Braille, large print)
- Providing a reassignment to another job.

Goodwill Industries of Northwest Ohio, Inc. will process requests for reasonable accommodation and will provide reasonable accommodations where appropriate, in a prompt and efficient manner in accordance with the time frames set forth in these Procedures.

Goodwill Industries of Northwest Ohio, Inc. has designated the Human Resources Director to oversee the reasonable accommodation program agency-wide. When an employee makes a request for reasonable accommodation, the Human Resources Director will work with the Director of Retail Sales to ensure an appropriate accommodation is provided; which meets the individual's disability-related needs and enables the individual to perform the essential functions of the position.

- As part of the reasonable accommodation interactive process, the Human Resources Director will obtain and evaluate documentation supporting an accommodation request (such as medical documentation demonstrating that the requestor is an individual with a disability), whenever the disability or need for accommodation is not obvious.

II. Reasonable Accommodation Procedures

A. Requesting Reasonable Accommodation

Generally, an applicant or employee must inform Goodwill Industries of Northwest Ohio, Inc. that an adjustment or change concerning an aspect of the employment process is needed due to a medical condition. An employee may request a reasonable accommodation at any time, orally or in writing and will be contacted by the Human Resources Director.

A request does not have to include any special words, such as "reasonable accommodation," "disability," or "Rehabilitation Act." A request is any communication in which an individual asks or states that s/he needs Goodwill Industries of Northwest Ohio, Inc., to provide or to change a work related process or benefit because of a medical condition.

A family member, health professional, or other representative may request an accommodation on behalf of a Goodwill Industries of Northwest Ohio, Inc. employee. For example, a doctor's note outlining medical restrictions for an employee constitutes a request for reasonable accommodation.

B. Processing the Request

The Human Resources Director is responsible for processing requests for reasonable accommodation and may work closely with an employee's supervisor in responding to the request, particularly those involving performance of the job. The Human Resources Director will gather relevant information necessary to respond to a request and assess whether a particular accommodation will be effective. No reasonable accommodation involving performance of the job will be approved without first informing an employee's supervisor or the supervisor.

After a request for accommodation has been made, the next step is to begin the interactive process to determine what, if any, accommodation should be provided. This means that the individual requesting the accommodation and the Human Resources Director must communicate about the request, the precise nature of the problem that is generating the request, how a disability is prompting a need for an accommodation, and alternative accommodations that may be effective in meeting an individual's needs. The Human Resources Director will contact the applicant or employee within 10 business days after the request is made to begin discussing the accommodation request.

C. Reassignment

There are specific considerations in the interactive process when an employee needs, or may need, a reassignment.

Generally, reassignment will only be considered if no accommodations are available to enable the individual to perform the essential functions of his or her current job, or if the only effective accommodation would cause undue hardship.

In considering whether there are positions available for reassignment, the Human Resources Director will work with both the supervisor and the employee requesting the reassignment to identify: (1) vacant positions within the agency for which the employee may be qualified, with or without reasonable accommodation; and (2) positions which the Human Resources Director has reason to believe will become vacant within **60 days** from the date the search is initiated and for which the employee may be qualified.

- Reassignment may be made to a vacant position outside of the employee's commuting area if the employee is willing to relocate. As with other transfers not required by management, Goodwill Industries of Northwest Ohio, Inc. will not reimburse an employee's mileage or travel costs.

D. Requests for Medical Information

Only the Human Resources Director may determine whether medical information is needed and, if so, may request such information from the requestor and/or the appropriate health professional. If an individual has already submitted medical documentation in connection with a previous request for accommodation, the individual should immediately inform the Human Resources Director of this fact.

A supervisor or office director who believes that an employee may no longer need a reasonable accommodation should contact the Human Resources Director. The Human Resources Director will decide if there is a reason to contact the employee to discuss whether s/he has a continuing need for reasonable accommodation.

E. Confidentiality Requirements

Under the Rehabilitation Act, medical information obtained in connection with the reasonable accommodation process must be kept confidential. This means that all medical information that Goodwill Industries of Northwest Ohio, Inc. obtains in connection with a request for reasonable accommodation must be kept in files separate from the individual's personnel file. This includes the fact that an accommodation has been requested or approved and information about functional limitations. It also means that any Goodwill Industries of Northwest Ohio, Inc. employee who obtains or receives such information is strictly bound by these confidentiality requirements.

G. Resolution of the Reasonable Accommodation Request

All decisions regarding a request for reasonable accommodation will be communicated to an applicant or employee by use of the "Resolution of Request" form as well as orally.

If Goodwill Industries of Northwest Ohio, Inc. grants a request for accommodation, the Human Resources Director will give the "Resolution of Request" form to the requestor, and discuss implementation of the accommodation. The "Resolution" form must be filled out even if Goodwill Industries of Northwest Ohio, Inc. is granting the request without determining whether the requestor has a "disability" and regardless of what type of change or modification is approved.

A decision to provide an accommodation other than the one specifically requested will be considered a decision to grant an accommodation. If the request is approved; but the accommodation cannot be provided immediately, the Human Resources Director will inform the individual in writing of the projected time frame for providing the accommodation.

If Goodwill Industries of Northwest Ohio, Inc. denies a request for accommodation, the Human Resources Director will provide the "Resolution" form to the requestor and discuss the reason(s) for the denial. When completing the "Resolution" form, the explanation for the denial will clearly state the specific reason(s) for the denial. If considered an undue hardship the Human Resources Director will explain specifically why the accommodation would result in undue hardship or why it would be an ineffective accommodation.

If there is a legitimate reason to deny the specific reasonable accommodation requested, the Human Resources Director will explore with the individual whether another accommodation would be possible. If the Human Resources Director offers an accommodation other than the one requested; yet is declined by the requester, the rejection of the alternative accommodation will be documented.

H. Informal Dispute Resolution

An individual dissatisfied with the resolution of a reasonable accommodation request may appeal the decision to the Corporate Compliance Officer. Individuals will be required to present the appeal in written form to 626 N. Huron Street Toledo, Oh 463604, within five days of receiving the response from the Human Resources Director. After five calendar days, the appeal will not be accepted for consideration. The Corporate Compliance Officer will provide a written response within seven days of receiving the written appeal. This is the final step in the process, thus the final decision by the Corporate Compliance Officer is considered binding.

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