



Memorandum

Subject: **INFORMATION:** FHWA Reasonable
Accommodation Procedures

Date: June 20, 2023

From: Irene Rico
Associate Administrator for Civil Rights

In Reply Refer To:
HCR-1

To: All FHWA Employees

The attached Federal Highway Administration (FHWA) Procedures on the Reasonable Accommodation Process for Job Applicants and FHWA Employees with Disabilities are effective immediately. In accordance with the Rehabilitation Act of 1973, as amended; the Americans with Disabilities Act Amendment Act of 2008; Title 29 Code of Federal Regulations, Part 1630; Part 1614.203(b); and the Genetic Information Nondiscrimination Act of 2008, FHWA will provide reasonable accommodations to qualified individuals with disabilities unless the accommodation poses an undue hardship on the operation of the U.S. Department of Transportation.

The FHWA Office of Civil Rights (HCR) is authorized to manage the Reasonable Accommodation Program in FHWA and tracks and reports requests to the Office of the Secretary on an annual basis. These procedures specify manager/supervisor and employee roles and responsibilities during the interactive reasonable accommodation decisionmaking process.

For further information about the procedures and for technical assistance, contact HCR at FHWA-RAassist@dot.gov or:

- Tanya Emam, Operations Team Leader, via MS Teams, phone at 202-366-3493, or email (tanya.emam@dot.gov)
- Kirsten Poston, Disability Program Manager, via MS Teams or email at (Kirsten.poston@dot.gov)
- Elizabeth Kraszewski, Disability Program Manager via MS Teams, phone at 202-366-1585, or email (elizabeth.kraszewski@dot.gov)

Per DOT Order 1011.1B, all current DOT employees must be given notice of this Order and any substantive revisions. Accordingly, please disseminate these FHWA Reasonable Accommodation Procedures to all staff in your division so that we can all do our part in not only remaining compliant with Departmental Orders, but also in

fostering an inclusive work environment that is accessible to all employees and where every FHWA employee can be fully engaged, respected, and valued.



Subject: FHWA REASONABLE ACCOMMODATION PROCESS FOR JOB APPLICANTS AND FHWA EMPLOYEES WITH DISABILITIES

1. PURPOSE

These procedures closely follow the U.S. Department of Transportation (DOT) Order 1101.1B, Procedures for Processing Reasonable Accommodation Requests from Job Applicants and DOT Employees with Disabilities. These procedures describe the roles and responsibilities of those involved in the reasonable accommodation process within the Federal Highway Administration (FHWA).

2. BACKGROUND

These procedures implement the changes to Title 29 Code of Federal Regulations (CFR) Part 1614.203, the U.S. Equal Employment Opportunity Commission (EEOC) regulation implementing Section 501 of the Rehabilitation Act of 1973, as amended (Rehabilitation Act), which prohibits Federal Agencies from discriminating on the basis of disability in employment. Implementation of this procedure also supports DOT's compliance with Executive Order (EO) 13164, requiring each Federal Agency to establish written procedures for processing reasonable accommodation requests for its employees and job applicants with disabilities. These written procedures are required by and should be read to be consistent with the requirements of DOT Order 1101.1B.

Reasonable accommodation applies to all aspects of employment, including the job/internship application process, recruitment, training, promotion, reassignment, rotational assignments, developmental assignments, as well as participation in DOT-conducted programs and activities and enjoyment of the benefits and privileges of employment. These procedures cover all requests for reasonable accommodations made by, or on behalf of, job applicants with disabilities and FHWA employees with disabilities. The EEOC provides guidance on how to determine the responsible decisionmaker for contingent workers (contractor employees), which is available here: <http://www.eeoc.gov/policy/docs/guidance-contingent.html>.

The reasonable accommodations process is important because it removes barriers in the work environment to enable applicants and employees with disabilities to perform the essential functions of their job, as well as to thrive, feel welcome, and contribute fully to the work environment in all aspects of the employees' work lifecycle. These procedures will assist job applicants and employees with disabilities to understand their rights in obtaining an accommodation. It is important to note that not all job applicants or employees with disabilities need accommodations.

3. DEFINITIONS

Decisionmaker: The decisionmaker is the individual with the authority and responsibility to make the reasonable accommodation decision. The decisionmaker does not review supporting medical documentation as part of their review process, but rather is provided with a disability determination from the Disability Program Manager (DPM), when appropriate (see section 4.2). Absent extenuating circumstances (see definition below), the decisionmaker will render a decision within 25 business days of receiving the request. The decisionmaker:

1. For FHWA employees,
 - a. normally is the employee's official first-line supervisor, as designated by a supervisory position description¹; and
 - b. if due to absence or other conflict the supervisor cannot participate, the alternate decisionmaker will be the second-line supervisor. Decisionmaking responsibilities cannot be delegated to non-supervisory Team Leaders.
2. For job applicants,
 - a. is the Chief of the DOT Automated Staffing Office of the Executive Agent within Office of Human Resources (HAHR), unless otherwise delegated in writing by the Chief of the DOT Automated Staffing Office of the Executive Agent; and
 - b. is the selecting official in consultation with HCR for the interview process.
3. For FHWA contractor employees,
 - a. is/should be determined by referring to their employer's reasonable accommodation process.

Designated Disability Advisory Team (DDAT): The DDAT is a team established by HCR to evaluate medical documentation submitted for complex cases as required by DOT Order 1101.1B. The DDAT will evaluate the medical documentation for complex cases, determine whether the accommodation requesting applicant or employee has a disability, and share that determination with the decisionmaker. A case may be deemed complex in nature when the DPM requires additional input in terms of formulating a disability determination, to include reviewing the employee's functional limitations for purposes of determining an effective reasonable accommodation. The team is activated at the request of the DPM within HCR with consultation of their leadership and includes the DPM after consultation with a requesting decisionmaker. The team is comprised of the DPM, HCR's Operations Team Leader, and members of HAHR's Employee Relations Team. Consensus will be reached by a simple majority. The DPM is responsible for setting the meeting appointments, providing supporting materials, and facilitating the discussion relating to the reasonable accommodation request.

¹ Generally, Team Leader positions are excluded from reasonable accommodation decisionmaking. Team Leaders with supervisory status codes of 2 or 4 are excepted and may serve as decisionmakers. Questions about supervisory status codes should be routed to the FHWA Office of Human Resources, Policy, Planning, and Data Analysis Division [HAHR-10].

Disability: For the purposes of FHWA’s Reasonable Accommodation Procedures, disability means:

- 1) A physical or mental impairment that substantially limits one or more major life activities;
- 2) A record of such an impairment;
- 3) Being regarded as having such an impairment; or
- 4) The actual or perceived impairment is not both “transitory and minor”.

Although pregnancy itself is not a disability, pregnant job applicants and employees are not excluded from the protections of the Americans with Disabilities Act (ADA). Please see the EEOC’s “Enforcement Guidance: Pregnancy Discrimination and Related Issues.” Refer to [EEOC guidance website](#) for more information on this topic.

Disability Discrimination: Disability discrimination occurs when:

- 1) An employer, or other entity covered by the ADA or the Rehabilitation Act, treats an individual with a disability, who is an applicant or employee, unfavorably because they have a disability;
- 2) A covered employer or other entity treats an applicant or employee less favorably because they have a history of a disability or because they are perceived to have a physical or mental impairment that is not transitory and minor (even if they do not have such an impairment); or
- 3) An effective accommodation is available, no legally permissible reason for denying the accommodation (such as those listed in 7(l)) applies, and a covered employer or other entity fails to provide a reasonable accommodation and cannot demonstrate that the request is an undue hardship on the employer.

Essential Functions: Essential functions are the fundamental job duties of the position. The job’s essential functions are generally found in the existing position description or the employee’s performance plan. However, a determination of the essential functions of a position is made on a case-by-case basis and reflects the job as actually performed. Factors to consider in determining whether a function is essential include:

- 1) Whether the reason the position exists is to perform that function;
- 2) The number of other employees available to perform the function or among whom the performance of the function can be distributed; and
- 3) The degree of expertise or skill required to perform the function.

Interim Accommodation: An interim accommodation is an action designed to fill a gap during the reasonable accommodation process until sufficient documentation has been received, an effective accommodation can be identified, or the selected accommodation can be obtained and provided. Implementation of an interim accommodation during the interactive process does not automatically mean that the requested accommodation will be provided, nor that the interim accommodation provided will be the permanent accommodation.

Major Life Activities: Major life activities include, but are not limited to:

- 1) Caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working; and
- 2) The operation of major bodily functions, including functions of the immune system, special sense organs, and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Physical or Mental Impairment: A physical or mental impairment is:

- 1) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine; or
- 2) Any mental or psychological disorder, such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Reasonable Accommodation: A reasonable accommodation is any change to the work environment or to the way things are usually done that results in equal employment opportunity (EEO) for a qualified individual with a disability. A reasonable accommodation can include the removal of physical barriers or modifications to how an employee does his or her job. A reasonable accommodation includes, but is not limited to:

- 1) Modifications or adjustments to a job application process that enable an applicant with a disability to be considered for the position they desire, provided they are qualified for the position;
- 2) Modifications or adjustments to the work environment, or the manner or circumstances under which the position held or desired is customarily performed, that enable an individual with a disability who is qualified for a given position to perform the essential functions of that position; and
- 3) Modifications or adjustments that enable a covered entity's employee with a disability to enjoy benefits and privileges of employment equal to those available to an employee without a disability.

Only applicants and employees with a physical or mental impairment that substantially limits one or more major life activities and has a record of such impairment are entitled to reasonable accommodations.

Reasonable Accommodation Management System (RAMS): RAMS is DOT's system for tracking reasonable accommodation requests from the initial request through the final decision. This system allows DOT to identify trends in reasonable accommodation requests and responses, and to report on our reasonable accommodation request processing to EEOC. While the system does capture information about reasonable accommodation requests and resolutions, it does not capture or store medical documentation. Entry for the RAMS is performed by a FHWA DPM and not the decisionmaker.

Qualified Individual: A qualified individual is someone who:

- 1) Satisfies the requisite skill, experience, education, and other job-related requirements of the position; and
- 2) Can perform the essential functions of the position, with or without reasonable accommodation.

Substantially Limits: Substantially limits broadly means the impairment substantially limits a major life activity in comparison to most people in the general population. It does not require scientific, medical, or statistical analysis in most cases. The focus is on how a major life activity is substantially limited, and not on what outcomes an individual can achieve. “Substantially limits” has a lower threshold than “prevents” or “severely or significantly restricts.”

Targeted Disability: A targeted disability is a subset of the larger disability category, recognized by the Federal Government as causing individuals with these disabilities facing significant barriers to employment, above and beyond the barriers faced by people with the broader range of disabilities. The current targeted disabilities are listed under “targeted disability or health condition” on the Office of Personnel Management's Standard Form 256 ([SF-256 \(opm.gov\)](https://www.opm.gov)). Targeted disabilities may also fall under one of the first 12 categories of disability listed in Part A of question 5 of the EEOC’s Demographic Information on Applicants form.

Temporary Accommodation: A temporary accommodation is an action provided when there is an anticipated ending time for an accommodation, such as when a temporary change in the environment prevents an individual from using their currently provided accommodation or an individual has a condition that is known to be temporary, but currently has limitations that limit their ability to perform a task.

Undue Hardship: An undue hardship occurs when a specific accommodation would require significant difficulty or expense for DOT. Determinations of undue hardship must always be made on a case-by-case basis, considering factors that include the nature and cost of the accommodation and the impact of the accommodation on the operations of DOT. Specifically, undue hardship means that the Department cannot absorb the costs or impact on operations of the proposed accommodation. The Secretary or a designee must make the final determination that an undue hardship exists. Please see Section 7.6.1 for more information.

Vacant Position: A vacant position is fully funded, with no current occupant, and the organization intends to fill, or will fill the position within at least 60 calendar days of the job search initiated by the decision to consider reassignment.

Reassignment: Reassignment is the reasonable accommodation of last resort and is required only after it has been determined that: (1) there are no effective accommodations that will enable the employee to perform the essential functions of their current position, or (2) all other reasonable accommodations would impose an undue hardship.

Extenuating Circumstances: These are circumstances that could not reasonably have been anticipated or avoided in advance of the request for accommodation, or that are beyond FHWA’s

ability to control. When extenuating circumstances are present, the 25 business day timeframe for processing a request for reasonable accommodation and implementing the accommodation will be extended as reasonably necessary to deal with the extenuating circumstance.

4. RESPONSIBILITIES

This section of the procedures outlines responsibilities of those involved in the reasonable accommodation process. The decisionmaker responsibilities are described in more detail under Section 5: Decisionmaker.

4.1. HCR is responsible for:

- Designating at least one DPM and a delegated backup to serve in the role when the assigned DPM is unavailable;
- Setting policy guidance on the reasonable accommodation process and distributing that guidance to FHWA managers and employees;
- Ensuring reasonable accommodation data is being captured for trends and reporting requirements; and
- Ensuring the DPM leads the DDAT on complex cases.

4.2. An HCR DPM is responsible for:

- Coordinating and consulting with the Departmental Office of Civil Rights (DOCR) as needed;
- Providing expert advice, training and assistance to supervisors, managers, and others on disability employment matters;
- Serving as the Designated Disability Advisor for simple cases, requesting and maintaining all medical information in accordance with DOT Order 1101.1B;
- Making the disability determination and maintaining its confidentiality;
- Leading coordination of the DDAT for complex cases;
- Partnering with HAHR and assessing trends about recruitment and employment of persons with disabilities;
- Maintaining and submitting completed reports in a timely manner;
- Recording reasonable accommodation data into DOT's tracking system;
- Providing assistance with drafting the closeout letter granting or denying the employee's request for accommodation; and
- Regularly consulting with the decisionmaker and employee to provide guidance and monitor timeframes.

4.3. FHWA's DDAT is responsible for ensuring that medical documentation submitted by the employee or applicant in complex cases is sufficient to make a disability determination for the employee's reasonable accommodation request.

HCR's DPM is responsible for ensuring medical records are not shared with the decisionmaker. HCR's DPM is responsible for ensuring that the precise language used by a medical professional regarding the requesting applicant's or employee's functional limitations and suggested accommodations be shared in writing with the decisionmaker. In cases where the DPM requires additional medical documentation to make a disability determination, the DPM will provide the employee with a Request for Medical Documentation form, which their medical provider completes (See Appendix A). The medical provider's actual words conveying the functional limitations as described in the medical documentation can be shared in writing with the decisionmaker to the extent necessary for the decisionmaker to carry out the responsibilities listed in Section 5 of these procedures. The DPM will review medical documentation in complex cases to determine if the employee has a disability and ensure the necessary information (disability determination, functional limitations, and medical provider's accommodation suggestion) is provided in writing to the decisionmaker as to allow the decisionmaker to make an informed decision. All aspects of the reasonable accommodation process must be kept confidential, including the initial request, the decision, disability, and any medical information that is obtained during the process.

4.4. Depending on the nature of the request, additional support may be warranted to assist the decisionmaker in the reasonable accommodation process.

- **Office of Human Resources (HAHR)**: Provides advice and guidance to supervisors, managers, and employees about HAHR policies and procedures related to reasonable accommodation, such as leave, telework, and performance management. HCR shall ensure coordination with HAHR to assist decisionmakers when reassignment is being considered as an accommodation of last resort. The reasonable accommodation process for reassignment search will be directed by HCR and coordinated with HAHR and DOT Selective Placement Program Coordinator.
- **Office of Chief Counsel (HCC)**: Provides advice and guidance to supervisors, managers, HAHR, the DPM, and the DDAT on legal aspects of the reasonable accommodation process.
- **Departmental Office of Civil Rights**: Provides policy guidance and oversees compliance with this DOT Order 1101.1B and relevant Federal laws and regulations. DOCR provides expert advice and consultant services on matters related to reasonable accommodations and conducts briefings and training sessions for the Operating Administrations (OA). DOCR will outline the required learning objectives for reasonable accommodation training to be delivered to DOT managers and employees by DOCR and the OA offices. DOCR is responsible for reviewing and approving all OA reasonable accommodation procedures and for drafting reasonable accommodation procedures for the Office of the Secretary of Transportation.
- **Disability Resource Center (DRC)**: Operated by the Departmental Office of Human Resource Management DRC is comprised of disability employment subject matter experts who assist DOT job applicants, employees, supervisors, and managers

throughout the employment life cycle, including recruitment, hiring, advancement, and retention of individuals with technical issues related to disabilities. DRC also helps facilitate reasonable accommodation requests and provides technical assistance related to Section 501. The DRC does not make decisions about whether an applicant or employee has a disability or whether to provide a reasonable accommodation but offers advice and recommendations on the available types of reasonable accommodations. The DRC must maintain the records for all reasonable accommodation interactions it has with employees and supervisors receiving these services. It also must provide the collected records and data to FHWA for the provided accommodation(s).

- 4.5. The Secretary of Transportation, or a designee, must approve any decision to deny an accommodation request when the basis of the denial is undue hardship.

5. DECISIONMAKER RESPONSIBILITIES

Decisionmakers are the individuals responsible for making decisions regarding reasonable accommodation requests. The decisionmaker for FHWA employees and applicants is as defined in section 3 above. The decisionmaker for a contractor employee requesting a reasonable accommodation should be determined by referring to their employer's reasonable accommodation process.

- 5.1. The decisionmaker for employees is assigned the role to:

- Recognize reasonable accommodation requests;
- Contact the DPM to request technical assistance;
- Make the reasonable accommodation decision for their assigned employees; and
- Comply with DOT Order 1101.1B and this procedure in relation to processing of reasonable accommodation and performing of responsibilities including, but not limited to:
 - Engaging in the interactive process;
 - Identifying and documenting the essential functions of the job;
 - Determining and documenting whether the employee is qualified for the position they hold;
 - Understanding the employee's functional limitations for which the requestor is seeking an accommodation;
 - Determining whether an accommodation is necessary to enable the employee to perform the essential functions of the job;
 - Ensuring that an employee can enjoy equal benefits and privileges of employment;
 - Identifying, locating, and purchasing effective accommodations in collaboration with HCR and the DRC when necessary;
 - Arranging for installation, and training, in collaboration with HCR's DPM and the DRC, as needed;
 - Confirming that the accommodation is effective and resuming the interactive process if the accommodation is not effective;

- Seeking guidance from HCR, HAHR, and HCC, as appropriate;
- Completing the reasonable accommodation process, providing a written decision in a closeout letter, and, if granted, providing an accommodation to the requesting individual. Refer to Section 8 for timeline of the reasonable accommodation process;
- Reporting to the DPM the information found within Section 10 of these procedures; and
- Treating the request, disability, and entire process as a confidential matter, where information is shared only with those with a “need-to-know” basis.

Communicating with the job applicant or employee regarding the effectiveness of a provided accommodation and reengaging in the interactive process if a change to the reasonable accommodation may be needed.

Decisionmakers are not to request any medical documentation from employees for a reasonable accommodation. If a request for accommodation is received where the disability is not obvious to the decisionmaker and there is not sufficient existing medical information on record to demonstrate need, then the decisionmaker is to contact the DPM. The DPM will request, review, and process the medical documentation, serving as the liaison to and consulting with the decisionmaker and the DDAT, as appropriate. The DPM will ensure the functional limitations as described in the medical records are shared with the decisionmaker to the extent necessary for the decisionmaker to carry out their responsibilities. In addition, the DPM and, as needed, the DDAT will ensure that the information shared is in writing and documents the medical providers’ actual words in relation to the accommodation through redaction or providing excerpts that relate to the decisionmaker’s responsibilities.

All medical documentation that is received by the decisionmaker or other supervisory official in support of a requested reasonable accommodation must be forwarded immediately upon receipt to the DPM for review and analysis. The decisionmaker or any other supervisory official in receipt of medical documentation should not maintain the official copy of the medical documentation. If the employee sends the medical documentation to someone other than the DPM, the person receiving the documentation is required to forward the documentation to the DPM for the disability determination in order to comply with recordkeeping requirements to ensure the privacy of that medical information. Only the DPM should retain copies of this documentation, and it shall be placed in the confidential medical files’ repository, not in the employee’s personnel file.

5.2. Incorporating Second Level Management Awareness:

Based on the severity of the reasonable accommodation and the impact to the office unit, accommodations may require situational awareness of the employee’s second-line supervisor or the officials higher in the decisionmaker’s chain of command. Second-line supervisory approval for some aspects of reasonable accommodation implementation may be routine, such as equipment purchases. In addition, second-line supervisors often have a need-to-know basis for situational awareness of approved reasonable

accommodations, such as full-time telework or remote work agreements. However, the second-line supervisor or other designated official should only be provided the necessary information to finalize the implementation for the reasonable accommodation. Requirement for approval of a reasonable accommodation by a second-line supervisor should be rare and must require DPM involvement. Decisionmakers and other supervisory officials should be particularly careful not to inadvertently disclose any information about the request or the requesting individual's medical information to those not involved in the process or who do not have a need to know.

5.3. Reasonable Accommodation Process for Applicants:

The reasonable accommodation process for job applicants will be directed by the Chief of the DOT Automated Staffing Office of the Executive Agent within HAHR.

6. APPLICANT AND EMPLOYEE RESPONSIBILITIES

Applicants to FHWA vacancies and current FHWA employees with disabilities are responsible for making their accommodation needs known. An employee with a disability must notify their first-level supervisor of the accommodation request.

A job applicant with a disability must notify the point of contact provided in the vacancy announcement, who will forward the request to the Chief of the DOT Automated Staffing Office of the Executive Agent within HAHR of any accommodation need. Applicants do not have to notify hiring officials of their accommodation needs in the application process.

Persons who request a reasonable accommodation are responsible for:

- Communicating fully to identify functional limitations during the hiring process or at work, and potential effective reasonable accommodations;
- Providing appropriate medical information/medical releases to the DPM, if requested, related to the functional impairment and the requested accommodation where the need for an accommodation is not obvious or already known;
- Participating in good faith in the interactive process, as failure to do so may be deemed as abandoning the reasonable accommodation process;
- If necessary, demonstrating through medical or other documentation that there is an impairment or disability and how that impairment or disability affects essential job functions for the purpose of reasonable accommodation decisionmaking; and
- Notifying the supervisor whether the reasonable accommodation that is provided is effective and reengaging in the interactive process if a change to the reasonable accommodation is needed.

7. REASONABLE ACCOMMODATION PROCESS

The reasonable accommodation process generally follows this order: a request for an accommodation; a conversation between the decisionmaker and the individual requesting the accommodation about the request, the employee's functional limitations, and potential effective

accommodations; a decision regarding the reasonable accommodation request; and the implementation of an effective accommodation. This process is interactive and requires both the decisionmaker and the individual requesting the accommodation to participate. Where appropriate, the process may also include requests for and submission of medical documentation by and from the DPM, followed by a determination whether the individual making the request is a qualified individual with a disability. All reasonable accommodation requests are considered on a case-by-case basis.

DOT Order 1101.1B requires all managers and supervisors (defined earlier in this document as an employee with a supervisory status of 2 or 4 in the personnel data system) to participate in DOT reasonable accommodation policy training provided by DOT and/or FHWA every 2 years. HCR will make available training for employee and supervisors. In addition, HCR will provide annual training to educate managers, supervisors, hiring specialists and others who may receive a reasonable accommodation request to ensure that they are able to recognize and respond to requests in accordance with DOT Order 1101.1B. The annual training will be recorded and placed in DOT Learns for tracking purposes. Within 6 months of starting their positions, new supervisors and managers must access the Office of Civil Rights Reasonable Accommodation Webpage to review this procedure and the DOT Order as well as access and complete the annual training offered in DOT Learns.

7.1. Initiating a Request:

A reasonable accommodation request is initiated by a statement, oral or written, made by an individual who requests an adjustment or change at work, in the application process, or in any benefit or privilege of employment, because of an impairment. The request does not need to include special words or use the term “reasonable accommodation,” and no such requirement can be imposed by the decisionmaker.

An individual with a disability can request a reasonable accommodation at any time during the application process or during employment. The time limit for processing reasonable accommodations begins as soon as the initial request, whether oral or written, is made. Refer to Section 8 for the timeline of a reasonable accommodation process. A specific form to initiate the reasonable accommodation request is not required. However, to enable the maintenance of accurate records of requests, employees and job applicants seeking a reasonable accommodation should promptly follow an oral request with a written request to the supervisor/decisionmaker and/or the decisionmaker can document an oral request in writing. If the request is related to an employee’s obvious disability, medical documentation should not be requested.

To minimize delays, employees should direct their reasonable accommodation requests in the following order:

- First-level Supervisor (Designated Decisionmaker), if unavailable to respond; then
- FHWA DPM, who will identify the appropriate official to act as decisionmaker.

7.2. Acknowledging Request:

FHWA has determined that the first-level supervisor (an employee with a supervisory status code of 2 or 4 in the personnel data system) functions as the decisionmaker for reasonable accommodation requests. The first-level supervisor of the employee is strongly encouraged to seek assistance from the DPM, and the Employee Relations Team within HAHR if accommodation requests are related to performance or conduct, and/or HCC may be consulted for complex cases or legal questions. Decisionmaking responsibilities may not be delegated to a non-supervisory team leader.

The decisionmaker or supervisor must contact the requesting party within a reasonable period of time, normally within 3 business days after the reasonable accommodation request is made, to acknowledge the request and initiate the interactive process. Please note that once a request is submitted to the decisionmaker or supervisor, the timeframe for processing the accommodation begins. Refer to Section 8 for the timeline for reasonable accommodation process. If a decisionmaker or supervisor is on leave or unavailable, an alternate who is the next person in the chain of command shall begin the process and contact the requesting party within a reasonable period of time, normally 3 business days. The acknowledgement must identify the date the initial request was made.

7.3. Interactive Process:

Communication is intrinsic to the reasonable accommodation process. During the interactive process, the decisionmaker will engage with the employee making the reasonable accommodation request by listening and understanding the employee's request and asking, "How can I help?" The individual requesting the accommodation and the supervisor must communicate in good faith to determine what limitations or barriers are experienced by the requestor and what accommodation, if any, is necessary. decisionmakers are responsible for participating and communicating, early and periodically, throughout the process. The interactive process may also include appropriate representatives from HCR and HAHR. HCC may be consulted by management, HCR, or HAHR as part of this process. To have these conversations effectively and to identify potential accommodations, individuals and Agency decisionmakers are encouraged to consult EEOC guidance and technical assistance documents. The DPM should be contacted very early in the process. The requestor is entitled to request updates of the reasonable accommodation process from their supervisor. Supervisors are required to respond to the requester as soon as possible, but, barring extenuating circumstances such as the supervisor's leave or travel, not later than 2 business days after the requester makes the update request. The supervisor will provide said updates to the DPM regarding the process for tracking purposes. The interactive process should be completed by providing a written decision in a closeout letter, and, if granted, providing an accommodation to the requesting individual within 25 business days since receipt of the request, absent extenuating circumstances. Refer to Section 8 for timeline of the reasonable accommodation process.

7.4. Interim Accommodations:

In situations where there is a delay in providing an approved reasonable accommodation, the decisionmaker must consider whether an interim accommodation can be provided while waiting for the approved accommodation to be implemented. Any interim accommodation offered must be presented to the employee with an explanation, in writing, of the provisional nature of the solution and the anticipated date of the more permanent accommodation. FHWA will provide an interim accommodation that allows the individual to perform successfully some or all of the essential job functions, as long as an undue hardship is not imposed.

7.5. Granting Requests:

The decisionmaker must communicate a decision to grant or deny a reasonable accommodation to the individual, in writing, as soon as practicable and within 25 business days absent extenuating circumstances and aligned with DOT Order 1101.1B.

The decisionmaker should quickly process requests that are simple and easy to obtain. If the request contains both a simple item and a complex item, the simple part of the request may be fulfilled prior to fulfilling the more complex part. For example, an employee with limited dexterity may need both a simple trackball and complex computer-related accommodations, such as speech-recognition software. The decisionmaker should provide easily obtained items and services that are necessary (such as a trackball) to enhance productivity and effectiveness to the employee as soon as reasonably possible. Simple requests should be documented and include the following information: a request for an item was made, no medical documentation was requested, no disability determination was made, and the item requested was provided.

If an accommodation is granted, but cannot be provided immediately, the decisionmaker must provide a projected timeframe for providing the accommodation and may use the interactive process to determine what, if any, interim accommodations may be put in place. Absent extenuating circumstances, the decisionmaker must provide the requesting party a decision and accommodation within 25 business days. The decisionmaker may extend the 25-business day period if such extension is necessary to facilitate receipt of medical information, including examinations, medical reviews, and other medical opinions. Refer to Section 8 for the timeline of the reasonable accommodation process. If there is a delay or anticipation of a delay in the processing of a request for reasonable accommodation, or the provision of a reasonable accommodation, a written notice must be provided to the employee giving the reasons for the delay. Such notice should include the projected timeframe for providing the accommodation.

Over time, the effectiveness of a granted accommodation may decrease due to circumstances such as software updates, Government cybersecurity requirements, or the progressive nature of the individual's disability. Employees may request that their accommodation(s) be reviewed and updated. A request for review and update must be treated as a new request for reasonable accommodation, adhering to the 25-business day

timeframe and reporting requirements. Refer to Section 8 for the timeline of the reasonable accommodation process. Similarly, the supervisor (who, due to the passage of time may not be the original decisionmaker) also may conduct a review of the reasonable accommodation if there is a question whether the granted accommodation remains effective or is still necessary. In conducting such a review, the supervisor should coordinate with the DPM and may consult with HAHR and/or HCC.

7.5.1. Granting an Alternative Accommodation:

If an alternative accommodation is granted instead of the requested accommodation, the decision should be communicated in writing as soon as practicable and within the timeframes contained in this procedure. Refer to Section 8 for the timeline of the reasonable accommodation process. When an alternative accommodation is provided, the requestor has the same appeal rights as if the request had been denied. The written notice of the decision to provide an alternative accommodation should specify the reason(s) why the specifically requested accommodation was not provided, and why the decisionmaker believes that the alternative accommodation granted is an effective reasonable accommodation. The notice must also provide the same information detailed in the “Denying Requests” section. Absent extenuating circumstances, for example, identified alternative software such as a Screen Reader is not compatible with existing equipment, the decisionmaker must give the requesting party the written decision, in a closeout letter, of the alternative accommodation within 25 business days of the date the request was made, not counting any periods when FHWA was awaiting medical documentation or other response from the requestor. This decision must be provided in an accessible format when needed.

7.6. Denying Requests:

When a decisionmaker denies a request for reasonable accommodation, the decision must be in writing and specify the reason(s) for denying the request. This decision must be provided in an accessible format when needed. Reasons for denying a request can include, but are not limited to:

- Medical documentation provided by the requestor is determined to be inadequate by HCR and the individual failed to provide additional medical evidence to establish that the individual meets the definition of having a disability under the Rehabilitation Act, as amended, and needs a reasonable accommodation;
- The individual making the request fails to participate in the interactive process, including, but not limited to failing to provide requested medical documentation to establish that the individual has a disability and needs a reasonable accommodation;
- Requested accommodation would require the removal of an essential job function;
- Requested accommodation would require the lowering of a performance or production standard; or
- Requested accommodation would create an undue hardship (see Section 7.6.1).

The written notice of denial also must inform the requesting party that they have the right

to request reconsideration of the decision, to file an EEO complaint, and may have rights under administrative grievance procedures. The written notice should provide instructions on how to request reconsideration and to whom the request should be submitted (see Section 7.7). The written notice should also provide instructions on how to file an EEO complaint and explain that pursuant to 29 CFR § 1614.105, the right to file a complaint will be forfeited unless the requesting party initiates contact with an EEO Counselor within 45 days of the denial. The written notice also should explain the procedures for alternative dispute resolution. The written notice should make clear, however, that a request for reconsideration or participation in an alternative dispute resolution process may not affect the time limits for initiating statutory claims nor satisfy the requirements for bringing a claim under EEO, Merit System Protection Board (MSPB), or administrative grievance procedures. Absent extenuating circumstances, the decisionmaker must give the requesting party the written denial decision within 25 business days of the date the request was made, not counting any periods when the Agency was awaiting medical documentation or other response from the requestor. Refer to Section 8 for timeline of the reasonable accommodation process.

7.6.1. Denial on the Basis of Undue Hardship:

Before reaching an undue hardship determination, the decisionmaker must have explored whether other effective reasonable accommodations exist that would not impose an undue hardship. In making an undue hardship determination, the decisionmaker must consult with the DPM, HAHR, Office of Chief Financial Officer (if the hardship is based on a financial issue), and HCC. The Secretary of Transportation, or a designee, must approve all decisions that an accommodation would result in an undue hardship.

7.7. Requests for Reconsideration:

Employees have the right to request reconsideration of a decision made on their request for accommodation. A request for reconsideration made by employees must be made in writing within 10 business days of receipt of the initial decision and typically should be made to the next person in line of the chain of command or other management official designated by the DPM who will seek assistance from HCR, HAHR, and HCC, and DPMs when responding to a request for reconsideration. A decision on a request for reconsideration made by the next person in the chain of command must be in writing and normally made within 15 calendar days of receipt of the request. Requests for reconsiderations made by job applicants will be addressed by the Executive Agent within HAHR.

7.8. Alternative Dispute Resolution:

While some disputes arising out of a denial of a request can escalate into formal administrative and legal forums, FHWA supervisors and employees are encouraged to use Alternative Dispute Resolution (ADR) or other appropriate mechanisms to resolve the disputes at the lowest possible level. Decisionmakers, FHWA supervisors, and employees are encouraged to resolve disagreements and disputes informally whenever

possible and regardless of whether the person has sought EEO counseling.

7.9. Other Appeal Options:

Individuals may choose to pursue statutory remedies for denial of reasonable accommodations.

- For an EEO complaint: Individuals must contact an EEO counselor within 45 calendar days from the date of the date of the initial decision on the accommodation request, or in the case of a personnel action, 45 calendar days of the effective date of the action.
- For adverse actions over which the MSPB has jurisdiction: Individuals must initiate an appeal to the MSPB within 30 days of the appealable adverse action as defined in 5 CFR § 1201.3. If the individual and the Agency mutually agree in writing to submit the dispute to an ADR process, the 30-day filing time limit is automatically extended to 60 days.

7.10. Confidentiality:

In general, all aspects of the reasonable accommodation process must be kept confidential. This includes the initial request, the decision, disability, and any medical information that is obtained during the process. Supervisors should be particularly careful not to inadvertently disclose any information about the request or the requesting individual's medical information to those not involved in the process or who do not have a need to know. There are a few exceptions to the confidentiality of the reasonable accommodation process. Refer to the exceptions in DOT Order 1101.1B, Section 7.v.

7.11. Conflicts of Interest:

To avoid conflicts of interest, any staff member who is involved in processing a reasonable accommodation request must not be involved in conducting an investigation or rendering a decision in a complaint challenging the Agency's handling of the accommodation request.

7.12. Additional Requirements Covered by DOT Order 1101.1B:

Additional process requirements related to the following are covered in detail in DOT Order 1101.1B; Section 7 Policy.

- Third-Party Requests (Reference: DOT Order 1101.1B, Section 7.f)
- Reassignment as a Reasonable Accommodation (Reference: DOT Order 1101.1B, Section 7.g)
- Ongoing or Repeated Services as an Accommodation (Reference DOT Order 1101.1B, Section 7.h)
- Personal Assistance Services (PAS) at Work and an Official Travel (Reference DOT Order 1101.1B, Section 7.i)
- Accommodations During DOT-Conducted Programs and Activities (Reference DOT Order 1101.1B, Section 7.s)

8. TIMEFRAMES

The timeframe starts from the initial date when requester makes the accommodation request to the decisionmaker. Absent the need for supporting medical documentation or the existence of other extenuating circumstances, the decisionmaker must process and make a decision on a request for reasonable accommodation within 25 business days from the date the request is made. When a particular accommodation can be decided and provided in less than 25 business days, the accommodation must be provided as soon as possible. Failure to provide an accommodation promptly may violate the Rehabilitation Act. 29 CFR §1614.203(d)(3)(i)(O). Where an accommodation is needed sooner than 25 business days from the date of the request to the decisionmaker, the requester may request expedited processing to the decisionmaker. Expedited processing may be necessary where the accommodation is needed to enable an individual to apply for a job or for a specific Agency activity scheduled to occur shortly. Granted accommodations must be implemented soon after the approval has been made (see timeline chart below and Appendix B attached).

Decisionmaker responsible to:	Timeframes
Acknowledge Request in Writing to Employee	Within 3 business days of employee initiating the request oral and/or written
Notify DPM via email that the Interactive Process has started	Within 3 business days of the decisionmaker's written acknowledgment of the request
Participate in Interactive Process w/ Employee (leads to decision to grant, deny, etc.)	Typically, 25 business days from receipt of the request (absent extenuating circumstances*)
Implement Granted Accommodation	Absent extenuating circumstances, immediately upon approval
Submit Closeout Letter to DPM	Within 3 business days post-issuance of the closeout letter to the requester. HCR will then enter the required information into the RAMS within 8 business days of receiving the closeout letter
Review Employee Request for Reconsideration (if applicable)	A request for reconsideration made by employees must be made in writing within 10 business days of receipt of the initial decision. A decision on a request for reconsideration made by the next person in the chain of command must be in writing and normally made within 15 calendar days of receipt of the request

*Extenuating circumstances are situations that could not reasonably have been anticipated or avoided or are beyond DOT's ability to control. Processing time can only be extended for as long as required to deal with the extenuating circumstance. For more details, see DOT Order 1101.1B, Section 7.q.

Requests for accommodations must be entered by HCR into HCR's RAMS, processed, and

accommodation(s) provided in as short a timeframe as reasonably possible (note: entry for RAMS is performed by the FHWA DPM and not the decisionmaker).

9. MEDICAL INFORMATION REQUESTS

When the medical impairment(s) or disability necessitating a reasonable accommodation is not obvious, or when the decisionmaker needs more information to determine what would be an effective reasonable accommodation, the decisionmaker should contact the DPM to initiate a medical documentation request. The request for medical documentation template will be submitted to the employee within approximately 2 business days by the DPM. The DPM will consult and send a redacted electronic copy or summary to the DDAT on correspondence for complex cases. Decisionmakers should not request medical information from the requestor directly. The DPM may request information such as:

- a. Nature, severity, and duration of the impairment relevant to the request;
- b. One or more of the major life activities that the impairment limits;
- c. Extent or degree to which the impairment limits a major life activity;
- d. Explanation of how the impairment affects the performance of a skill or a function; or
- e. Explanation as to how an accommodation will help an individual apply for a job, perform the essential functions of a job, or enjoy the benefits and privileges of the workplace.

Medical documentation requests assist in determining whether the individual has a disability, how the impairment affects the individual's ability to participate in the application and interview process or ability to perform the essential functions of the job, and what types of accommodations may be effective.

In formulating the request for medical information, the DPM should consult with the decisionmaker regarding the information needed to identify an effective reasonable accommodation. Once the medical information is received, the DPM along with the DDAT (for complex cases) should determine whether there is a disability and, if so, consult with the decisionmaker to review the requestor's functional limitations for purposes of determining an effective reasonable accommodation. The DPM can work with HCR to have the medical information provided reviewed by a medical expert if the request is medically complex.

If the medical information submitted is insufficient to establish whether the individual has a disability as defined in the Rehabilitation Act, or to determine the accommodation(s) that is/are necessary and would be effective, the DPM has the right to request relevant supplemental medical information. The DPM may seek guidance from the offices of HADR and HCC when requesting supplemental medical information on complex cases and should consult with the decisionmaker regarding the information needed to identify and evaluate potential effective reasonable accommodations. When requesting more information, the request must:

- a. Explain the insufficiency;
- b. Identify the information and documentation needed;
- c. Place the individual on notice that failure to provide the identified documentation can result in denial of the accommodation request;
- d. Allow the individual the opportunity to provide the identified information and

- documentation; and
- e. FHWA utilizes the medical documentation template found in the appendices. Once the decisionmaker has issued the written decision (the closeout letter) granting or denying an accommodation, the medical information must be maintained by the DPM in accordance with 10 (a), below.

10. INFORMATION, REPORTS, AND ADDITIONAL RESOURCES

To enable the reporting on and evaluation of DOT's effectiveness in responding to reasonable accommodation requests, FHWA and DRC must collect, compile, and report the information set forth below.

- a. Records: All records related to the reasonable accommodation determination, especially medical records, must be maintained separate and apart from the personnel files of the employee. The decisionmaker shall provide a copy of the closeout letter to the DPM once a reasonable accommodation determination is issued. The DPM can provide a closeout letter template and assist the decisionmaker with closeout letter edits, as necessary. HCR is responsible for maintaining medical records obtained in relation to the reasonable accommodation for the duration of the FHWA employee's tenure. Once an FHWA employee leaves the Agency, their medical documentation should be remitted to the FHWA employee or destroyed 3 years after employee separation or all appeals are concluded, whichever is later (per General Records Schedules, Schedule 1, item 24; available at: <https://www.archives.gov/files/records-mgmt/grs/grs-transmittal-24.pdf>.)

The records management will be done in a secure, electronic filing system that allows medical documentation to be readily available and retrievable by appropriate personnel.

- b. Submission of Information and Reports: All decisionmakers must notify HCR of the required information regarding the provision of reasonable accommodations. HCR will then enter the required information into RAMS within 8 business days of receiving the closeout letter by the decisionmaker.
- c. Accommodations Tracking and Data Reporting: The EEOC's Management Directive 715 requires DOT to report on the timeliness of reasonable accommodation request processing in the Annual EEO Program Status Report and Plan. HCR must maintain the data listed below in an aggregate format, and must be able to transmit the aggregate information electronically to third parties, through RAMS:
 - The number of reasonable accommodations, by type, that have been requested in the application process;
 - A description of the reasonable accommodation requested, if any, and the date the request was made;
 - Whether the accommodation was needed to apply for a job, perform the essential functions of a job, or enjoy the benefits and privileges of employment;
 - The jobs (occupational series, grade level, and Agency component) for which

- reasonable accommodations have been requested;
 - The names of the requestor and the decisionmaker, as well as the contact information for the decisionmaker;
 - Whether medical documentation was requested and, if so, dates specifying when it was requested and when it was received;
 - The amount of time taken to process each request for reasonable accommodation;
 - Whether the reasonable accommodation request was approved and, if not, a brief justification of the denial; and
 - Sources of technical assistance consulted by the decisionmaker during the process.
- d. Submitting DOT Policies and Procedures to the EEOC: Pursuant to EO 13164, each Agency that adopts reasonable accommodation procedures must submit the procedures to the EEOC. FHWA is responsible for submitting the Agency's reasonable accommodation procedures to the EEOC for review at the time that any modifications to the procedures are adopted.

EFFECTIVE DATE AND IMPLEMENTATION

This document is effective immediately upon signature.

Irene Rico
Associate Administrator for Civil Rights

Date: _____



Appendix A

Medical Documentation Request

Form to be completed by a Licensed Physician or Health Care Provider

CONFIDENTIAL

PLEASE RETURN TO FHWA-RAassist@dot.gov at the Federal Highway Administration (FHWA) in a CONFIDENTIAL MANNER, such as by password protecting the document.

The Federal Highway Administration requests that the treating health care provider of EMPLOYEE NAME provide information to enable FHWA to assess whether there is a reasonable accommodation that FHWA can provide to permit EMPLOYEE NAME to perform the essential functions of their position of JOB TITLE.

The employee's position description is enclosed. The information on the essential functions of the job is included in that position description. If you have any questions, please contact FHWA-RAassist@dot.gov.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of employees or their family members. In order to comply with this law, we **are asking that you not provide any genetic information when responding to this request for medical information.** 'Genetic information,' as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Employee's Name (print): _____

Medical Professional's Name/Title (print): _____

Telephone number: _____

Dates of Examination/Treatment: _____

Medical Condition(s) that is/are the Basis for this Request: _____

Anticipated Duration of Condition(s): _____

Is Employee substantially limited in any major life activities as a result of their health condition(s)? If so, please identify the major life activities.

Is Employee unable to perform any of the essential functions of their job as listed in the position description or limited in their ability to do so? If so, please identify each limitation or inability to perform and the expected duration.

Does the condition cause Employee any functional limitations (such as limitations in the ability to reach, stand, bend, grip, concentrate, speak, etc.)? If so, please describe the limitations and their expected duration.

Based upon your knowledge of Employee's condition, are there any accommodations that FHWA can provide that you believe would permit Employee to perform the essential functions of their job? If so, please list the possible accommodations, with a description of how each accommodation would alleviate the Employee's limitations at work. Please list as many accommodation options as possible and note which of these accommodations may be used in combination and their likely effectiveness.

Does Employee require leave from work or a reduced schedule as a result of their health condition? If so, please indicate what additional leave is required and/or what schedule of work Employee is, able to adhere to and what you estimate to be the expected duration of this need.

Please provide any additional information that you believe would assist FHWA in determining, in consultation with Employee, whether an accommodation can be provided to permit them to perform their job at FHWA. We stress that you should not provide information that would provide us with information that should not be disclosed under GINA (see introductory language in this form).

Date: _____
Medical Professional's Name and Title (print): _____
Medical Professional's Signature: _____
Type of Practice: _____
Business Name: _____
Phone Number: _____



Appendix B

FHWA Reasonable Accommodation Interactive Process Flow Chart

STEP 1: Employee Initiates Request

Employee notifies their first-line supervisor of the need for an accommodation (orally or in writing). If recipient of the request is not a supervisor (with a supervisory status code of 2 or 4 in the personnel data system), they provide notice of the request to the Disability Program Manager (DPM) who will identify the appropriate official to act as Decisionmaker.



Within 3 business days
(Start of Interactive Process)

STEP 2: Decisionmaker Acknowledges Request

Decisionmaker acknowledges request in writing to employee or their representative. If the Decisionmaker is unable to respond, refer to Section 7.1 of FHWA Reasonable Accommodation Procedures.



Within 3 business days

STEP 3: Decisionmaker Notifies DPM

The Decisionmaker must notify the DPM in writing that the interactive process has started (include the date of written acknowledgment provided to the employee).

STEP 3A: Hidden Disability?

- If the disability is not apparent or obvious, the DPM will request supporting medical documentation from the employee within 2 days of receiving notice from the Decisionmaker. If the disability is apparent/obvious and functional limitations are known, this step may not be necessary.



STEP 3B: Obvious Disability?

- No consultation with DPM required, however the Decisionmaker must remember to contact DPM for reporting purposes when process is complete.
- For obvious Disabilities, proceed to step 5, Essential function analysis.



Within 3 business days (from
receipt of medical
documentation)



Skip to Step 5

STEP 4: Disability Determination made by DPM

After reviewing the medical documentation, the DPM will render a disability determination and provide the determination to the Decisionmaker within 3 business days.



(Note: Steps 5 through 7 shall be completed within 16 business days. This reflects the remaining days left to align with the 25-business day timeframe of the interactive process unless there are extenuating circumstances).

STEP 5: Essential Function Analysis

- For requests from an applicant or employee with hidden disabilities, the Decisionmaker will perform an essential function analysis, reviewing relevant information, such as, but not limited to, the employee's Position Description and Performance Plan.
- If the requested accommodation removes an essential work function from the employee's position description or performance plan, there is no obligation to provide the requested accommodation and further discussion between the employee and supervisor (or relevant parties such as the DPM) should explore the potential for alternative effective accommodation solutions.



STEP 6: Interactive Process Meetings (cont.)

- The Decisionmaker will discuss with the employee and appropriate parties (such as the FHWA Office of Civil Rights (HCR), Office of Human Resources, Office of Chief Counsel, Disability Resource Center, etc., when necessary) what the employee is requesting and if it may pose an undue hardship.
- If the employee is requesting an accommodation that is effective, does not remove essential work functions or pose an undue hardship, the accommodation should be granted and implemented as quickly as possible, and within 25 business days, absent extenuating circumstances.



STEP 7: Decisionmaker Issues Closeout Letter

- Once reaching a decision to grant, deny, or provide an equally effective alternative, the Decisionmaker will complete and submit a closeout letter to the employee with a cc to FHWA-RAassist@dot.gov within 3 business days after an accommodation decision has been reached with employee.
- The DPM can provide a closeout letter template and assist the Decisionmaker with closeout letter edits, as necessary.



Within 8 business days of receipt of closeout letter

STEP 8: Submission of Accommodation Decision in RAMS

- All Decisionmakers must notify HCR regarding the provision of reasonable accommodations (i.e., closeout letter).
- HCR will then enter the required information received by the Decisionmaker regarding an employee's reasonable accommodation request into the RAMS within 8 business days of receiving the closeout letter by the Decisionmaker.