

Reasonable Accommodation Guide (Supervisors)

1. Introduction/Background

AFMC is committed to fostering a supportive work environment for all Airmen, including those with disabilities. Providing reasonable accommodation is not just a legal requirement, it's crucial to mission success. This guide provides a streamlined process to ensure we are effectively and efficiently meeting the needs of our workforce.

2. Key Definitions

- **Qualified Individual with a Disability:** A person who meets job qualifications and has a physical or mental impairment that significantly limits a major life activity. This includes individuals with a record of such impairment or who are regarded as having an impairment.
- **Essential Functions:** The fundamental duties of a position. These are determined on a case-by-case basis, not by job description alone. (Should consult with HR to verify).
- **Reasonable Accommodation:** A modification or adjustment to a job, work environment, or practice that enables a qualified individual with a disability to perform the essential functions of their job.
- **What's Not a Reasonable Accommodation:** Lowering performance standards or fundamentally altering the nature of a job, caregiver duties (FMLA), and temporary conditions (recovery from surgery, broken bones, etc.) that may require other leave statuses and can be discussed with HR/EMR for assistance.

3. Resources at Your Disposal

- **Installation Disability Program Managers:** (Enter information here)
- **DAFI 36-2710, Chapter 14:** This regulation outlines the Air Force's reasonable accommodation procedures.
- **Job Accommodation Network (JAN):** Find practical accommodation ideas and solutions at www.askjan.org.
- **Computer/Electronic Accommodations Program (CAP):** Resources specifically for computer and electronic accommodations are at www.cap.mil.

4. Streamlined Process for Supervisors

Step 1: Employee Initiates the Request

- **Open Communication:** Let employees know they can approach you if they believe a disability is impacting their work. Employees do not have to explicitly say, “I need a reasonable accommodation.”
- **Formal Request:** Provide the employee with the "How to Guide for Employees" (attached).
- **Sample Language:** "I understand you're experiencing challenges that may be related to a disability. If you'd like to request a reasonable accommodation, please submit an electronic request using the attached guide.”
- **Note:** The supervisor should not wait for the employee to submit a formal reasonable accommodation request in the portal before entering into the interactive process and discussing possible solutions.
- If the individual with a disability states that he or she does not need a reasonable accommodation, the supervisor will have fulfilled his or her obligation to the employee and should memorialize the employee’s denial for a need of a reasonable accommodation in writing.

Step 2: Request Submission and Review

- **Electronic Submission:** The requestor, supervisor, and servicing installation DPM are automatically notified upon submission.
- Supervisors will begin processing the request for reasonable accommodations as soon as it is made, whether or not the confirmation has been provided in writing or the RAR portal.
- The interactive process begins within 10 days of receipt of the initial request for reasonable accommodation by the supervisor.
- **Request Statuses:** Familiarize yourself with the request statuses: **Validate** (this is only to verify you have received the request, this is not the final approval), **Deny** (only for submission errors, not the accommodation itself), and **Reassign** (if the request was sent to you in error).
- **Track Requests Online:** Monitor the status of requests at: [Air Force RA portal](#)
- **Timely Decision:** You have 30 days to provide a written decision, unless extenuating circumstances exist (e.g., awaiting medical documentation).

Step 3: Supervisor Review and Interactive Process

- **Essential Functions:** Supervisors will consult with the servicing civilian personnel section (CPS) to identify the essential functions of the position if they are not easy to determine.
- **Engage in Dialogue:** Supervisors will be proactive in seeking out and considering possible accommodations, to include consulting the installation DPM, occupational medicine, legal, and other appropriate resources for assistance.
 - Clearly understand the limitations caused by the disability.
 - Brainstorm potential accommodations together.
- **Medical Documentation:**
 - Determine if medical documentation is needed. It is required if:
 - The disability and need for accommodation are not obvious.
 - Confirmation is needed that the employee is a qualified individual with a disability.
 - Specific functional limitations need to be identified.
 - If required:
 - Request for Medical Information
 - Send request forms to the employee and servicing installation DPM.
 - **Sample Language:** “To ensure we can provide you with the most appropriate support, we need a little more information about your medical needs. Please take a moment to complete and return the attached Medical Request documentation within 20 days. This will help us determine the best way to accommodate your request. If we don't receive the forms within 20 days, it may be assumed you're no longer requesting assistance.”

Step 4: Assessing Medical Documentation

- **Sufficient Documentation:** Proceed to Step 5.
- **Insufficient Documentation:**

- If the medical information is submitted but insufficient to determine the disability or the functional limitations of the employee, supplemental information may be requested by the decision authority.
- The decision authority may consult with the installation occupational medicine office to determine the sufficiency of medical documentation.
- Use Request for Supplemental Medical Documentation.
- Send the form to the employee and servicing installation DPM.
- The decision authority will also provide a reasonable timeframe for the employee to respond to the request for additional information that will be no less than 5 calendar days.
- **Sample Language:** “To help us fully understand your needs and provide the best possible service, we request some additional medical information. Please take a moment to sign and return the attached Request for Supplemental Medical Information within 20 days. If we don't receive the form returned within 20 days, or any communication to justify delays, that can be considered a withdrawal of your request.”

Step 5: Decision and Documentation

- **Decision Time:** Based on the information gathered, render decision and document on the DAF Reasonable Accommodation Decision Request Form. Options include:
 - **Grant Accommodation:** Issue the decision form to the employee. If accepted, send the signed form to the servicing installation DPM.
 - **Modification of Accommodation:** Explain your rationale on the Reasonable Accommodation Request Decision Form, including reasons for not granting the initial request and the effectiveness of the alternative. If the employee rejects the offer of an equally sufficient accommodation, you should re-engage in the interactive process in a good faith attempt to find a solution.
 - If the employee remains in disagreement with all equally effective offers of accommodation, consult with legal and consider the accommodation of last resort. Employees should be made aware that this action may result in separation action if no other available position for which they are qualified can be located.

- When an employee rejects all offers of alternate accommodations, you may use the suggested verbiage, “You have been offered an equally effective alternate accommodation that would enable you to perform the essential functions of your position. However, you have rejected this alternate effective accommodation. Therefore, and pursuant to 29 CFR 1630(d), you will no longer be considered a qualified individual within the meaning of the Rehabilitation Act for purposes of your present request. See 29 CFR 1630.2(m). This is an exhaustion of the process.”
- **Denial of the Accommodation by Agency:** Provide detailed justification on the decision form and send it to the servicing installation DPM. The servicing installation DPM will assist with the denial process, including legal coordination and final determination. **Remember:** Denials require review and endorsement by the Wing/Delta Commander (or equivalent) or designee, not below the grade of O-6 or civilian equivalent (IAW DAFI36-2720, para. 14.2).

Important Reminders

- **Denial Process:** Follow the established procedure for denials, which involves higher-level review and legal coordination. Any denials by the agency should be provided with the Rights Advisement.
- **Denials of reasonable accommodation:** Requests will be issued in writing no later than 10 calendar days of the decision to deny the request.
- **The denial of equally effective reasonable accommodation by the employee is not the same as a denial by the agency.** This scenario does not require routing through the servicing legal office and installation commander.
- **Ineligibility for a requested accommodation (not a Qualified Individual with a Disability):** does not constitute a denial of reasonable accommodation. These cases should be directed to the appropriate avenue for assistance, rather than the wing/delta commander for a denial. For example, employees seeking accommodation for caregiver responsibilities should be referred to HR/EMR for information on FMLA and other leave options because they are not a Qualified Individual with a Disability and therefore, ineligible.
- Supervisor will notify servicing installation DPM of any reasonable accommodation processed without assistance.

6. Decision Authority Guidance

- For higher level approvals that request telework as a reasonable accommodation route to (1) Squadron CC or equivalent for decision, or (2) Group Commander (O-6) or equivalent for interim approvals. All other decisions should be made at the first line supervisor level.

7. Conclusion

By working together and utilizing the resources available, we can ensure a supportive environment for all our Airmen. Remember, reasonable accommodations are essential to mission readiness and reflect our core values.