

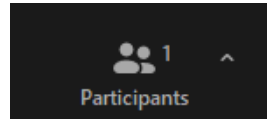


Occupational Accommodations Training For Supervisors

Leah Reinardy, Occupational Accommodations
Specialist

Tech Check

1. Rename Yourself



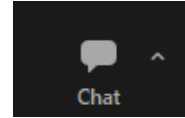
- Participants > Hoover over your name > 3 dots > Rename. Type your Name, Pronouns, and Department.

2. Mic & Video Test



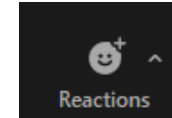
- Select the microphone button to unmute yourself & say hello! Select the video button to go on/off camera.

3. Locate the Chat Feature



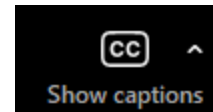
- Select the three dots > Chat to open up the chat box.

4. Raise Hand or Use Reactions



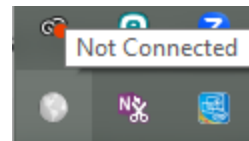
- Select the three dots > Reactions > Raise Hand to raise your hand.

5. Turn on Closed Captioning



- Select Show Captions button, select your preferred language, click Save.

6. Turn off your VPN



7. Grab a Copy of the Learner Workbook / Handouts



- Found in Chat from your facilitator!

Disruption? Try logging out and logging back in again.

About Leah



**Leah Reinardy
(they/she)**

- Occupational Accommodations Specialist
- Started with the City in April 2025

Group Agreements

Be Present

Take Space

Make Space

Take Notes

Be Curious

Ask Questions

Additions?



Learning Objectives

1. Define what an accommodation is and have a basic understanding of laws related to accommodations.
2. Know how and when to identify and refer an accommodation request.
3. Articulate your role in the disability accommodations process.
4. Gain strategies for creating a culture of accessibility within your team and agency.



Agenda

- ☐ Understanding Disability & Disability Accommodations
- ☐ Identifying & Referring Accommodation Requests
- ☐ Your Responsibilities in the Accommodations Process
- ☐ Creating a Culture of Accessibility



Understanding Disability & Disability Accommodations

Definition of "Disability" According to ADA

One of these criteria must be true for an employee to have a disability according to the Americans with Disabilities Act (ADA):

- Physical or mental impairment that substantially limits one or more major life activities
- Record of a physical or mental impairment that substantially limited a major activity
- Actual or perceived impairment that is not both transitory and minor

Definition of "Disability"

A person is also considered to have a disability if they have difficulty:

- Performing various functions (seeing, hearing, talking, walking, lifting, concentration, etc.)
- Difficulty performing activities of daily living
 - Bathing, dressing, eating, mobility, using the restroom
- Difficulty with certain social roles
 - Working at a job, performing household activities, completing schoolwork

Activity: Understanding Disability

Think about someone (outside of work) who has a disability and/or chronic medical condition.

How do limitations from this disability or medical condition impact the person's life (communication, self care, recreation, family, transportation) outside of work?

What does this person do differently to live or participate?

What Is An Accommodation?



[Video Link](#)

Accommodations Benefit Everyone

Many inventions created to accommodate some individuals are so commonplace we don't think of them as accommodations!



Glasses



Captioning on TVs at a loud restaurant or on social media content (Instagram Reels, TikTok)



Siri/Cortana/
Alexa

Why Disability Accommodations Matter

- Alignment with City's Mission, Vision, and Values.
- Intersects with every aspect of the City's Talent Management Strategy
- Increases representation of disabled employees in government
- Accessibility improvements benefit everyone
- Compliance with federal/state law and City APMs



Laws Related to Accommodations

Many laws intersect with the Americans with Disabilities Act depending on the case:

- [Pregnant Workers' Fairness Act \(PWFA\)](#)
- [Protecting Urgent Maternal Protections Act \(PUMP Act\)](#)
- [Family and Medical Leave Act](#)
- [WI Fair Employment Law](#)

City Policies Related to Accommodations

- [APM 2-22: Workplace Accommodations](#)
- [APM 2-21: Family and Medical Leaves of Absence](#)
- [APM 2-31: Leave of Absence Without Pay](#)
- [APM 2-40: Fitness for Duty Examinations](#)
- [APM 2-45: Disability Leave/Layoff](#)
- [APM 2-7: Temporary Transitional Assignments](#)



Agenda Check-In 1

- ✓ Understanding Disability & Disability Accommodations
- ☐ Identifying & Referring Accommodation Requests
- ☐ Your Responsibilities in the Accommodations Process
- ☐ Creating a Culture of Accessibility



Identifying & Referring Accommodation Requests

Navigate Multiple Lanes

- As supervisor, you may be navigating multiple "lanes".
 - Performance concerns
 - Misconduct allegations
 - FMLA requests
 - Promotions/transfers
- Limit the information you share at first about performance, promotion/transfer, and misconduct "lanes" when discussing an accommodations case.



Identify the "Link"

Look for the "link" between these two things to identify a disability accommodation request:

1. The employee's medical condition and/or disability
2. The employee's job, job application, and/or benefit of employment

If you're not sure – refer!

Activity: Is This An Accommodation Request?

- The following slides contain case scenarios of potential requests.
- Answer the Zoom poll "Yes" or "No", type responses in chat, or unmute your microphone to share whether you think it is an accommodation request or not.

Is This An Accommodation Request?: Training Materials

One of your employees shares that they struggle reading training materials in a 1:1 meeting with you. They also mention they have a unit training coming up next week in this conversation.

Is This An Accommodation Request?: Training Materials

Yes, this is a request.

- Prioritize this and be mindful of deadlines (1 week).
- Refer the employee to Leah.
- Give Leah the employee's contact information.
- Provide any training materials for the upcoming training to Leah.

Is This An Accommodation Request?: Lifting Difficulties

You are a supervisor of Facility Maintenance Workers for your agency. One of your employees comes into work. At the start of their shift, they tell you they can't complete their shift for the night because they can't lift more than 10 lbs, but they should be better by next week.

Is This An Accommodation Request?: Lifting Difficulties

Yes, this is a request.

- If their assigned work requires them to lift more than 10 lbs, the employee needs to go home on their own leave.
- Connect with Leah as soon as possible (if this is night shift, you may not get a response until the morning)
- Provide the employee with Leah's contact information.

Is This An Accommodation Request?: Care of a Child With A Disability

Your employee texts you requesting a shift change because they need to care for their child with complex medical needs.

Is This An Accommodation Request?: Care of a Child With A Disability

No, this is not an accommodation request.

- There is no link between the employee's own medical condition and their job.
- Flexible work arrangement requests would follow other processes.
- Provide FMLA information to the employee.

Is This An Accommodation Request?: Disclosure in Discipline Meetings

You are conducting a disciplinary meeting with one of your employees. When you review the allegations about the employee's behavior, they share that they behaved that way due to a medical condition.

Is This An Accommodation Request?: Disclosure in Discipline Meetings

Yes, this is an accommodation request.

- Refer the employee to Leah.
- Provide Leah the employee's contact information.
- Refrain from making assumptions at this point in the process.
- Be aware that you may also working with City HR Labor Relations in these cases.

Making A Referral

- If an employee requests to connect with the Occupational Accommodations Specialist, please do the following:
 - Give the employee the Accommodations contact information.
 - Phone: 608-267-1156
 - Email: Accommodations@cityofmadison.com
- Email Leah the employee's contact information.
- If you're not sure – refer!



Break Time

10 Minutes



Agenda Check-In 2

- ✓ Understanding Disability & Disability Accommodations
- ✓ Identifying & Referring Accommodation Requests
- ☐ Your Responsibilities in the Accommodations Process
- ☐ Creating a Culture of Accessibility



Your Responsibilities in the Accommodations Process

Accommodations Process Overview

- An employee makes an accommodation request.
 - There is no "official" process/form to start a request.
- The Occupational Accommodations Specialist will meet with the employee and supervisor separately to gather information.
 - There is room in the process to be creative if we all need to meet together.
- Third parties may be pulled in on a "need to know" basis if technical expertise is required (ie, IT, safety/ergonomics, fleet maintenance staff).
- Once a determination has been made, the employee and supervisor will receive a copy of a determination letter.
- Some accommodations may be re-evaluated in the future.

Supervisor Responsibilities

- Identify and refer accommodation requests.
- Maintain confidentiality of employee information.
- Meet with the Occupational Accommodations Specialist to review the request.
- Keep an open mind and be creative.
- Provide a current position description.
- Check in with various City HR colleagues if you are navigating multiple "lanes" at once.
- **Avoid making assumptions and work through the interactive process in every case.**

Maintaining Confidentiality

- If emailing about an employee, use their initials in the subject line (not their full name).
- If an employee expresses medical concerns, offer to meet with them in a private space so others do not overhear.
- Check in with the Accommodations Specialist to see if an individual is in the "need to know" before adding additional people to an email chain or meeting.
- If you receive a medical note from an employee, forward it to the Accommodations Specialist and delete it from your inbox.
- Do not share with an employee's colleagues that they have an accommodation (especially when those colleagues ask).

Ways the Accommodations Specialist Supports Supervisors

- Works with employee to identify limitations and accommodations
- Reviews medical documentation and restrictions
- Conducts a job analysis based on the employee's request
- Advises and coaches managers and supervisors
- May work with other providers on specific cases
- Manages complex processes (placement, fitness for duty)
- Facilitates returns from disability layoff

Job Applicant Accommodations

- Work **quickly** with your recruitment contact and the Occupational Accommodations Specialist on these.
- If the request is related to an interview panel, consider educating the panel on disability etiquette (ie, how to interact with ASL interpreters)
- Be careful of what clarifying ("off script") questions you ask an applicant regarding their ability to complete tasks (as it may get close to asking them about a disability).
 - Work with the Accommodations Specialist and your HR Analyst if you have questions.

Equipment Purchases

- Over 50% of purchases cost \$0 (Job Accommodation Network)
- If an agency purchases equipment as an accommodation, it is the agency's property, not the employee's as this comes out of the agency's budget.
- High bar for "undue hardship" because the City is one employer.
- Consider setting aside budget money in your agency's budget for accommodation-related purchases.
- Common purchase requests:
 - Ergonomic office equipment (keyboards, chairs)
 - Headphones, headsets
 - Software

Pregnant Workers' Fairness Act (PWFA)

- Requires employers to provide reasonable accommodations for known conditions "related to pregnancy, childbirth, or related medical conditions"
- Work quickly on these and expect needs to change month to month.
- Can temporarily suspend an essential function of the job as an accommodation. (The ADA does not allow this.)
- Different requirements for collecting medical documentation.
- A condition may qualify under the ADA and PWFA (example: postpartum depression)

PWFA “Just Do It” Accommodations

There are 4 "just do it" accommodations:

1. Ability to carry or keep water nearby.
2. Ability to take extra restroom breaks.
3. Ability to take breaks to eat or drink.
4. Ability to change workstation from standing to sitting or vice versa.

PUMP Act

- The City has been practicing this through APM 2-50: Lactation Policy for Breastfeeding Employees and Visitors.
- Requires employers to provide employees with reasonable break times and spaces to express breast milk.
 - Space: Must be a private, non-bathroom space.
 - Time: Allows for some flexibility in how/when breaks are taken. Consult with the Occupational Accommodations Specialist with questions.

Leave As An Accommodation

- If an employee is ineligible for FMLA or has exhausted their FMLA time for the year, they may request leave as an accommodation.
 - Ensure that you are making the referral if necessary.
- This is seen as an accommodation of last resort.

"Last Resort" Accommodations Processes

The following accommodations are highly complex processes. **Please work with HR for approval – they must determine it is appropriate.**

- Leave as an accommodation
- Fitness for Duty assessments
- Job Placements
 - The Occupational Accommodations Specialist works with an employee to search for a City position within 60 business days.

Religious Accommodations

- There are many similarities to the disability accommodations process.
- The City receives a few of these cases each year.
- If you receive a request:
 - Contact the Occupational Accommodations Specialist.
 - You will be provided just-in-time training.

Activity: Case Scenarios

- We will review a series of complex case scenarios together.
- Unmute your microphone or share in chat:
 - Your approach to the situation
 - Factors you would consider
 - Questions you may have

Case Scenario: Remote Work

An employee who spends 40% of time at their desk preparing reports and presentations requests to work remotely because they are having difficulty concentrating.

Case Scenario: Remote Work - Answers

- Make the referral to Leah.
- Be prepared to send a copy of the position description.
- Review the essential functions of the job.
 - What essential functions can be done in person versus remotely?
 - What existing policies are in the unit related to telework and/or flexible working arrangements?

Case Scenario: Remote Work/Colleagues

You work with the Occupational Accommodations Specialist and approve a 40% telework schedule per week for the employee.

One of the employee's colleagues (and one of your direct reports) asks you in a 1:1 why this employee gets to telework 40% of the time while they are required to work fully in-person.

How do you respond?

Case Scenario: Remote Work/Colleagues - Answers

Ways to respond to colleague questions:

- "This is a confidential matter that I am already aware of. I work to follow City policies and procedures related to assigning and managing work."
- Attempt to redirect the conversation to another topic.

Case Scenario: Observed Workplace Difficulties

You are a supervisor of Mechanics in an agency. One morning, you walk out on the shop floor and notice one of your employees is having difficulty completing their assigned tasks for the day. You notice them holding their shoulder, stretching their shoulder, and wincing, then momentarily stepping away from the vehicle they are working on before continuing to work.

Case Scenario: Observed Workplace Difficulties

- Walk up to the employee and generally check in on how their day is going.
- If they share medical information:
 - Treat this like an accommodation request and refer to Leah.
 - Give Leah the employee's contact information.
- If they do not share medical information:
 - Reach out to Leah and Risk Management to assess the situation.
 - We would discuss the following:
 - Are you noticing performance difficulties with the employee?
 - Are you observing the employee wincing/holding their shoulder repeatedly over time?
 - Are you are aware of any workplace incidents this might be related to?

Case Scenario: Religious Accommodation

One of your employees, a Streets employee, shares with you that they cannot follow the unit's uniform guidelines. They share that they must wear a long skirt instead of pants due to the religion they practice.

Case Scenario: Religious Accommodation - Answers

- Provide the employee a copy of the Religious Accommodation Request Form.
 - This is required for these requests (different from disability/pregnancy accommodations)
- Instruct the employee to directly submit the form as soon as possible to the Accommodations inbox or to Leah.
- Consult quickly with the Accommodations Specialist to determine if a temporary accommodation can safely be granted while working through the process.
 - Assess safety requirements when reviewing the position description.
 - Leah will likely consult with Safety in these cases.

Case Scenario: Pregnancy Accommodation

You are a fire lieutenant. One of your employees, a firefighter, discloses to you that they are pregnant and shares they are unable to respond to 911 calls.

Case Scenario: Pregnancy Accommodation - Answers

- Refer the employee to Leah.
- Provide the employee with FMLA contact information.
- Do not make assumptions based on contract language.
- If the employee brings in a note with restrictions and there is no work within their restrictions, they will likely go out on their own leave.
- Be open to discussing a potential temporary reassignment as an accommodation (this is possible under PWFA).
- Be flexible and open-minded; this employee's needs will likely change month to month.



Agenda Check-In 3

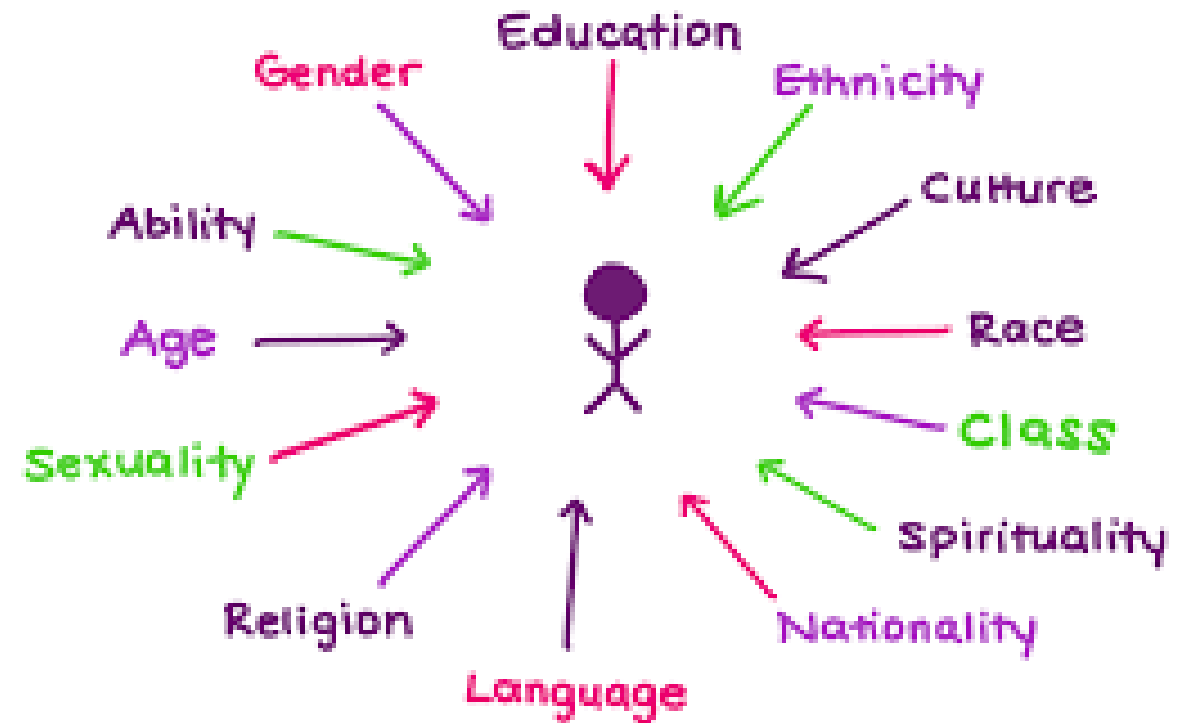
- ✓ Understanding Disability & Disability Accommodations
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- ☐ Creating a Culture of Accessibility



Creating a Culture of Accessibility

Intersectionality

- Intersectionality = someone's life experiences are shaped by overlapping aspects of their identity (race, gender, class, sexual orientation, etc.)
- Disabled employees' experiences will vary based on the level of privilege they have in various intersectional identities.
- Two employees with the same diagnosis may have very different experiences.



Spoon Theory



Get up



Get dressed



Take medication



Shower or bathe



Dry or style hair



Read



Watch television



Play games



Cook and eat a meal



Make a phone call



Shop



Walk the dog



Go to the doctor or hospital



Exercise



Drive or take public transport



Garden



Study



Go to work or school



Clean the house



Socialise



Do laundry

Energy Management

- Disabled employees may be depleted more quickly by tasks that do not deplete their nondisabled colleagues.
 - Daily commute to/from the office
 - Large meetings or trainings
 - Team lunches or networking events
 - Taking a meeting with cameras on versus cameras off
 - Attending last-minute or same-day meetings
 - Rapid context switching (transitioning from task to task)

Healthcare System Barriers

The healthcare system has many barriers that impact employees going through the accommodations process:

- Cost of medical appointments, medications, and tests.
- Long wait times to see specialists.
- Many marginalized groups are underrepresented in medical research and may be less likely to receive a diagnosis.
- Disabled employees must take extra time and energy to manage appointments, advocate for their own care, and present themselves to providers so they are taken seriously.

Inclusive Communication Strategies

- Actively listen to and believe your employees' experiences.
- Use plain language in spoken and written communications.
- Actively create onboarding plans and training sessions with diverse learning styles and needs in mind. Contact OD if you need guidance on adult learning strategies.
- One framework to try: "What by When, Why" method for clarity
 - Example: "I need an agenda 24 hours before this meeting. Receiving this will help me better prepare to answer your questions for me."
- Celebrate the strengths and wins your team brings to you!

Accommodations Office Hours

You all have access to "drop in" office hours with Leah over the next couple of weeks:

- Thursday, October 8 – 1:30 PM – 3:30 PM
- Tuesday, October 20 – 9 AM - 11 AM
- Thursday, October 22 – 2 PM – 3:30 PM

Resources for Further Learning

- City of Madison Disability Resource Group (DRG)
 - Attend events and/or support your employees' attendance at events!
- Additional City Trainings
 - Family and Medical Leave for Supervisors
 - Handling Confidential Information
 - Plain Language & Effective Communication
 - Document Accessibility Basics
- Job Accommodation Network

Learning Objectives Revisited

1. Define what an accommodation is and have a basic understanding of laws related to accommodations.
2. Know how and when to identify and refer an accommodation request.
3. Articulate your role in the disability accommodations process.
4. Gain strategies for creating a culture of accessibility within your team and agency.

Takeaways

What's one action you can commit to taking based on today's training?

Key Concepts

- Identify the "link" and make the referral in a timely manner
- Respect confidentiality of the process
- City HR is here to support you!

Contact Information

Leah Reinardy

Occupational Accommodations Specialist

Email: LReinardy@cityofmadison.com

Phone: 608-267-1156

Accommodations Inbox (direct employees here):

Accommodations@cityofmadison.com

Thank You for Joining!

Please participate in our Course Evaluation Survey – your feedback is important!