



# Defense Logistics Agency

## Return to In-Person Work

### Interim Reasonable Accommodation

February 4, 2025

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OPR: DLA Equal Employment Opportunity (EEO)

SUBJECT: DLA Return to In-Person Work--Interim Reasonable Accommodation (IRA) Process Guidance

REFERENCES: See Enclosure 1. Updated as new guidance is released.

PURPOSE: Establish an agency-wide process for making centralized decisions on interim Reasonable Accommodations (IRAs) for individuals requesting situational telework, regular and recurring telework, or remote work as an RA, submitted on or after February 4, 2025. This process will ensure a consistent approach to granting telework or remote work options across the enterprise as DLA implements its Return to In-Person Work guidance.

1. SUMMARY OF CHANGES: Initial release.
2. APPLICABILITY: This guidance is applicable DLA-wide.
3. POLICY: Provide an interim RA to qualified individuals with disabilities in accordance with the Americans with Disabilities Act (ADA) and Rehabilitation Act.
4. RESPONSIBILITIES: See Enclosure 2.
5. PROCEDURES: See Enclosure 3.
6. INFORMATION REQUIREMENTS:
  - a. DLA Memorandum for Interim RA Decision Authority (IDA) will be utilized by the first-line supervisor to recommend to IDA whether to approve an interim reasonable accommodation (IRA).
  - b. DLA Form 1887 Confirmation of Request for Reasonable Accommodation will be utilized to initiate an RA Request.
  - c. DLA Form 1887-1 Resolution of Reasonable Accommodation Request and

Notification of Rights will be utilized to approve, deny, or provide an interim reasonable accommodation (IRA).

- d. Reasonable accommodation forms, further information on required documentation, and instructions on how and where to submit a reasonable accommodation request are available on the [DLA Equal Employment Opportunity \(EEO\) Office website](#).
7. RELEASABILITY: This guidance is approved for release and available to users with a need to know.
8. INTERNAL CONTROLS: All personal information collected from individuals, including medical documentation, will be treated in accordance with applicable laws and policies on privacy, including the 29 CFR 1614.203 Rehabilitation Act of 1973 as amended, Privacy Act of 1974 and DoD Instruction 5400.11, "DoD Privacy and Civil Liberties Programs," January 29, 2019, change 1 effective December 8, 2020.
9. EXPIRATION DATE: The Guidance will expire NLT 365 days from issuance or earlier when cancellation is issued by OPR.

JANICE SAMUEL  
Director  
Equal Employment Opportunity

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## ENCLOSURE 1: REFERENCES

- (a) 29 CFR 1614.203 Rehabilitation Act of 1973 as amended
- (b) 29 CFR 1630 Regulations to Implement the Equal Employment Provisions of the American with Disabilities Act (ADA)
- (c) Executive Order 13164, Establishing Procedures to Facilitate the Provision of Reasonable Accommodation (July 26, 2000)
- (d) DoD Directive 1020.06, Establishing and Maintaining Comprehensive Reasonable Accommodation Policies and Programs, January 17, 2025
- (e) DLAI, 1440.01, Reasonable Accommodations (RA) for Individuals with Disabilities, November 28, 2022
- (f) Presidential Memorandum, Return to In-Person Work, January 20, 2025
- (g) OPM Memorandum, Guidance on Presidential Memorandum Return to In-Person Work, January 22, 2025
- (h) OMB and OPM Memorandum, Agency Return to Office Implementation Plans, January 27, 2025
- (i) Secretary of Defense Memorandum, "Initial Department of Defense Implementation Guidance, Return to In-person Work," January 31, 2025
- (j) DLA Director Memorandum, "DLA Return to In-Person Implementation Guidance," February 3, 2025

## ENCLOSURE 2: RESPONSIBILITIES

1. DIRECTOR, EQUAL EMPLOYMENT OPPORTUNITY (DO), under the authority, direction, and control of the DLA Director, will:

- a. Establish a process for making centralized decisions on interim Reasonable Accommodations (IRAs) for individuals requesting situational telework, regular and recurring telework, or remote work as an RA.
- b. Maintain a mechanism to process and track IRAs.
- c. Provide IRA data to DLAD/DV/CoS as required.

2. MSC COMMANDERS AND DIRECTORS, J CODE DIRECTORS, AND THE DLA CHIEF OF STAFF will:

- a. Designate an Interim RA Decision Authority (IDA) within their respective organizations to serve as their organization-wide decision-maker for all RA requests for situational telework, regular and recurring telework, or remote work. The IDA must be an individual no lower than a GS-15 and must be an individual from the organization's headquarters office (e.g. Chief of Staff).
- b. Ensure the IDA decides whether to grant an interim RA (IRA) in accordance with timelines set forth in this guidance.

3. INTERIM REASONABLE ACCOMMODATION DECISION AUTHORITY (IDA) will decide for their respective organization whether to provide an interim RA (IRA) to individuals requesting situational telework, regular and recurring telework, or remote work as an RA.

4. DISABILITY PROGRAM COORDINATOR (DPC) will

- a. Manage the IRA decision-making process at their respective MSC/HQ.
- b. Provide RA requests to the IDAs to decide whether to grant an IRA to individuals requesting situational telework, regular and recurring telework, or remote work as an RA.

5. FIRST LINE SUPERVISORS, will:

- a. Refer employee to the DPC within two business days from the time the employee requests situational telework, regular and recurring telework, or remote work as an RA.
- b. Participate in the interactive process and work closely with the employee and DPC to discuss whether an IRA is appropriate.

c. Provide a memorandum to the IDA with a recommendation whether to provide an IRA.

6. EMPLOYEES will:

a. Request an RA orally, via e-mail, or by submitting DLA Form 1887 directly to their supervisor or servicing DPC. If sending a request to the DPC, send RA request to the geographically closest servicing Major Subordinate Command's (MSC)/HQ RA mailbox, not to the Disability Program Coordinators' work email address. The RA mailboxes for each MSC/HQ DPC are listed on the DLA EEO website.

b. Participate in the interactive process with the first-line supervisor.

c. Provide required information, such as medical documentation, when requested by the DPC and if needed, request an extension when more time is needed to obtain the required information.

d. Adhere to the RA processing timelines provided by the DPC.

7. APPLICANTS will:

a. Request an RA by contacting the point of contact identified in the job announcement.

b. Provide medical documentation, if requested.

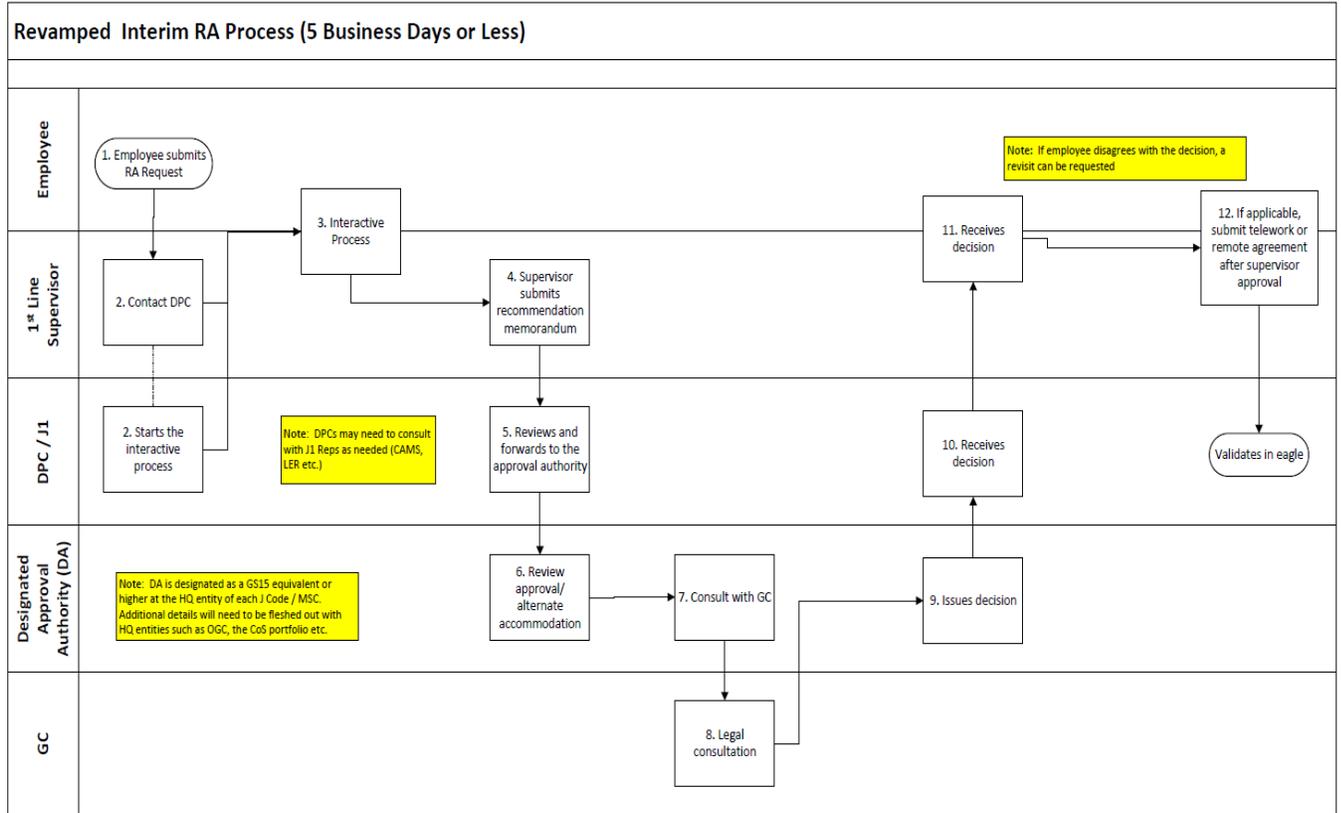
8. DLA GENERAL COUNSEL (DG) will serve as the IDA legal advisor as appropriate.

## ENCLOSURE 3: PROCEDURES

### 1. PROCEDURES FOR MAKING CENTRALIZED DECISIONS ON INTERIM REASONABLE ACCOMMODATIONS (IRAS) FOR INDIVIDUALS REQUESTING SITUATIONAL TELEWORK, REGULAR AND RECURRING TELEWORK, OR REMOTE WORK AS AN RA.

- a. The DPC will work with the RA requester and first-line supervisor to collect all the required information for the IDA to decide whether to provide an IRA. The DPC will facilitate the interactive process between the requestor and first-line supervisor.
- b. No later than 2 business days after the interactive process is complete, the first-line supervisor will provide a memorandum with a recommendation whether to provide an IRA to the DPC who will promptly review and transmit the memorandum to the IDA using the memorandum template at Attachment 3.
- c. The IDA will review the first-line supervisor's recommendation and make a decision whether to provide an IRA within 5 calendar days.
- d. The IDA's decision will be provided to the DPC who will forward the IRA decision to the first-line supervisor who will then complete the interim notification memo and provide it to the requester and DPC for the file.
- e. The employee may request the IDA reconsider the IRA decision if the employee believes the IRA is not effective.

# Attachment 1: Interim RA Process Flowchart



## Attachment 2: IDA Designation Memo

MEMORANDUM FOR EEO DIRECTOR

SUBJECT: Designation as an Interim Reasonable Accommodation Decision Authority

I, [MSC, J/D Code Commanders/Directors], hereby designate [Mr. John Doe, title, grade], as the Interim Reasonable Accommodation Decision Authority for [organization MSC, J/D code] with all the roles, responsibilities, and limitations in accordance with the most current guidance process on Interim Reasonable Accommodations for Telework and Remote Work. This appointment is for approving interim accommodation for individuals requesting situational telework, regular and recurring telework, or remote work as an RA, submitted on or after February 4, 2025. This process will ensure a consistent approach to granting telework or remote work options across the enterprise as DLA implements its Return to In-Person Work guidance.

Reasonable Accommodation Authority for this appointment is in accordance with the Rehab act and Americans with Disability Act as amended. The responsibilities and procedures are in Enclosures 2 and 3 of the guidance for Interim Reasonable Accommodation Authority.

Designation is effective the date of this appointment, until formally relieved/terminated. This designation and authority may not be further delegated and cannot be re-designated or transferred to anyone except under my authorization.

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MSC J/D Code Commander/Director signature

Attachment 3: Memorandum for the 1<sup>st</sup> Line Supervisor

DATE: Month, Day Year

MEMORANDUM FOR (Requesters First Line Supervisor)

SUBJECT: 1<sup>st</sup> Line Supervisor Notification of Request for Interim Reasonable Accommodation (IRA)

Your employee (Employees Name) submitted a request for an IRA. They are requesting (Remote Work, Situational Telework or Regular and Recurring Telework on a Permanent or Temporary Basis). The medical condition as stated by the employee falls within the definition of an individual with a disability as defined by the Americans with Disabilities Act, as amended. As you are aware, the RA process is an interactive process, and because of the type of request identified above, the request must be elevated to DLA Headquarters for approval. Pending that decision, the employee is requesting implementation of the requested RA as an interim accommodation.

As the first-level supervisor, you must prepare a recommendation concerning your employee's request for IRA. I have attached a memo for you to complete and return to me as soon as possible, but not later than three calendar days from the date this memo is signed. Your recommendation memo will be provided to the Interim Decision Authority (IDA) who will decide if the IRA will be approved, alternate approved or denied. Until the IDA has issued a decision, the employee may be required to use approved leave, as applicable, for any absences related to the medical condition and the subject request for Accommodation. Be advised, if the employee fails to provide documentation to support their request in a timely manner, or fails to participate in the RA interactive process, you will be notified. If this happens the subject RA will be closed, and any IRA may be terminated. If the IRA is approved by the IDA the employee must update their Telework Agreement in EAGLE.

Once you complete the IRA recommendation memo please provide it to me for submission to the IDA. Once a decision is made you will be notified and required to provide your employee with their decision via the Employee Interim Reasonable Accommodation Notification Memo

Please feel free to contact the undersigned if you have questions.

SIGNATURE BLOCK Disability Program Coordinator

( [REDACTED] )

Enclosure:

Supervisor Notification Memo  
Supervisor's Recommendation Memo  
Employee Notification Memo

Attachment 3: Recommendation Memorandum for the Interim Decision Authority

CUI

MEMORANDUM FOR INTERIM REASONABLE ACCOMMODATION DECISION  
AUTHORITY (IDA)

SUBJECT: Interim Reasonable Accommodation (IRA) Recommendation, RLM-25-0000

The employee listed below and I, with the assistance of the Disability Program Coordinator (DPC) engaged in the interactive process and it was determined that the employee has a qualifying disability as defined in Defense Logistics Agency Instruction 1440.01, Reasonable Accommodations (RA) for individuals with Disabilities, under the authority of the Americans with Disabilities Act of 1990 as amended in 2008. The RA request is being processed by the EEO Office at [redacted]

This Section is to be Completed by the DPC

- Employee name: [redacted]
- Position Title: [redacted]
- Pay Plan-Series-Grade: [redacted]
- MSC/J-Code & Office Code: [redacted]
- Supervisory Status: [redacted]

1. Requested Interim Accommodation: [redacted]

2. Describe the employee's workplace limitations:

[Large redacted area for describing workplace limitations]

CUI

CUI

RLM-25-0000

**SUPERVISOR MUST RETURN EEO NLT**

4. Describe the essential functions of the employee's position:

[Redacted area for describing essential functions]

4.a. Can the employee's essential functions be performed in a remote work environment?

Yes

No - Provide a Detailed Explanation of why duties cannot be performed in a remote work environment.

[Redacted area for detailed explanation]

5. Method(s) by which employee interacts with customers, supervisors, co-workers, team, etc.

[Redacted area for interaction methods]

6. Describe typical work products the employee produces and explain how work products are submitted. List Operating System the employee must rely on to complete work assignments and tasks.

[Redacted area for work products and OS]

This Section is to be Completed by the employee's supervisor

CUI

CUI

RLM-25-0000

7. Access to Classified and/or Sensitive Information  Yes  No

8. Anticipated Frequency of Travel

[Redacted]

- Position does not have travel requirement
- Up to 25%
- Between 25% to 50%
- Greater than 50%

9. State whether you are recommending an IRA and if so, explain what you recommend and the reason.

[Redacted]

REMOVE

Supervisor's name  
Organization  
email

This Section is to be Completed by the employee's supervisor

This section to be completed by the Interim RA Decision Authority

- Approve
- Disapprove
- Alternate Interim Accommodation:

[Redacted]

REMOVE

Interim RA Decision Authority

CUI

Attachment 5: Employee Notification Memo



**DEFENSE LOGISTICS AGENCY**  
HEADQUARTERS  
8725 JOHN J. KINGMAN ROAD  
FORT BELVOIR, VIRGINIA 22060-6221

[Redacted]

MEMORANDUM TO

[Redacted]

[Redacted]

SUBJECT: Interim Reasonable Accommodation Decision

[Redacted]

This memorandum serves as an approval for a temporary accommodation (interim accommodation) while you engage in the Defense Logistics Agency (DLA) Reasonable Accommodation Interactive Process. It was determined that you have a qualifying disability as defined in DLA Instruction 1440.01, *Reasonable Accommodations (RA) for individuals with Disabilities*, under the authority of the Americans with Disabilities Act of 1990 as amended in 2008. The Interim Decision Authority has approved your request for:

[Redacted]

The approved duration of your interim accommodation is:

[Redacted]

This interim accommodation will be in place for the approved duration stated above or until a decision is made on your request for accommodation, if no final decision is made before the date stated above. This interim accommodation will allow time for review of your reasonable accommodation request by higher level approval authorities per DLA policy.

This interim accommodation does not negate your requirement to participate in the interactive RA process and provide timely documentation as needed. If you fail to provide the required documentation, this interim accommodation may be terminated for your failure to effectively participate in this process.

You must also understand that this interim accommodation does not constitute a reasonable accommodation in accordance with agency guidance or the Rehabilitation Act of 1973, as amended. It is imperative that you understand that your request for an RA will be evaluated on individual merit and decided based on its facts. The type of interim provided may not be the final accommodation provided to you. This interim accommodation may be terminated or modified at any time.

It is your responsibility to update your telework agreement in EAGLE. Please contact me if you have any questions.

[Redacted Signature Block]