

DEFENSE LOGISTICS AGENCY

Established 1961



Reasonable Accommodation Process Update

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THE NATION'S LOGISTICS COMBAT SUPPORT AGENCY



DLA Return to In-Person Work: RA Update and Interim Reasonable Accommodation Process Guidance

Purpose:

DLA Return to In-Person Work – RA Update and Interim Reasonable Accommodation Process Guidance

Agenda:

- RA Definitions
- Supervisors Responsibilities
- Medical Documentation
- RA Process
- Interim RA Process
- Process Documents
- Annual Review
- Revisits
- Reconsiderations
- Reassignments
- Disability Retirement
- Records Management
- Key Things to Remember
- Resources
- How to Contact a DPC



Information



Guidance



Decision



Other



Housekeeping

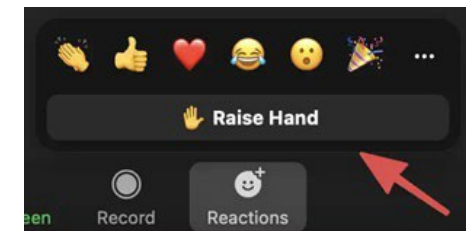
Welcome

Welcome! We are so pleased you could join today.

This training is for Supervisors and Managers only!!!

Friendly reminders:

- Remain on mute and turn cameras off
- Utilize the chat feature to share your thoughts and questions
- Use non-verbal features such as Raise Hand or Reactions
- Keep remarks on topic and be courteous
- No PII will be discussed at this time.
- Be considerate by not talking over people, and give everyone a chance to speak
- Slides will be shared following the session on the EEO RA Site





What is a Reasonable Accommodation?

FY 25

Definition:

*Any **change** in the **work environment** or in the way activities are **customarily done** that would enable a qualified individual with a disability to perform the essential functions of their position.*



What is a Disability

FY 25

- Definition: A **physical** or **mental** impairment that limits one or more major life activities
- Major Life Activities: Walking, Seeing, Hearing, Thinking, Talking, Concentrating, Standing and Sitting

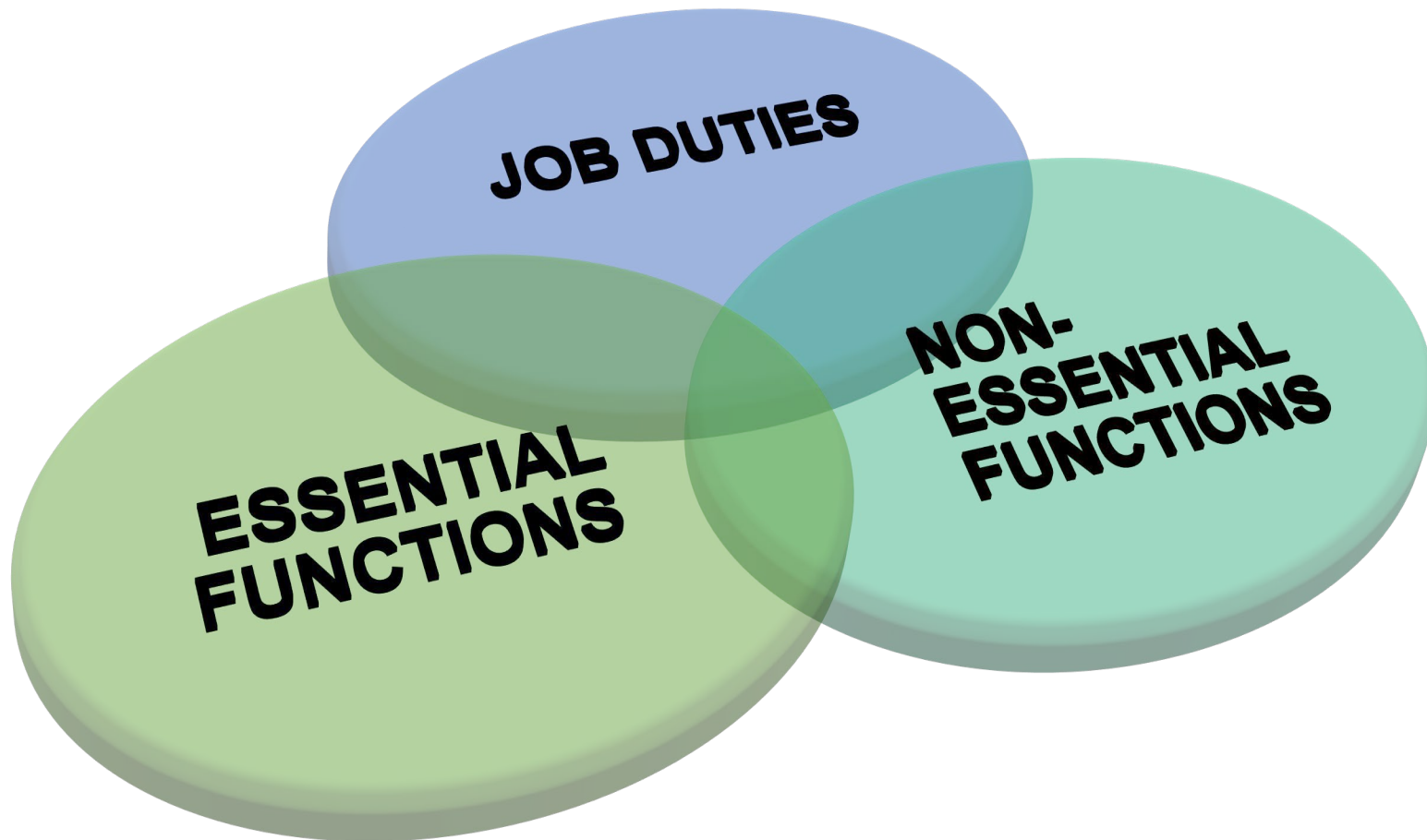


Source: Americans with Disabilities Act Amendments of 2008



Essential vs. Non-Essential

Job Functions





What is an Interim Reasonable Accommodation?

Definition:

*Any **temporary** or **short-term** accommodation that is put in place while the employee is engaging in the interactive process.*



Supervisors Must:

- Refer employee to the DPC within two business days from the time the supervisor is notified of the employee's need for accommodation.
- Participate in the interactive process with the employee and DPC and adhere to RA timeframes.
- Provide information regarding the essential functions of the employee's position
- Make the final decision on the type of accommodation offered to employees based on, but not limited to, job duties, employee's needs, knowledge of job requirements, and employee limitations. Does not apply to remote and telework requests.
- Communicate with your employee regarding the status of their request.
- Coordinate with stakeholders throughout the process and communicate RA status to the employee.
- Serve as recommending official in the centralized RA process (remote and telework requests).
- Conduct periodic follow-up in the first 60 days with the employee to ensure the RA is effective.
- At a minimum conduct an annual review of the employees RA to ensure the RA is still needed and is effective.



Roles and Responsibilities

Reasonable Accommodation Stakeholders

Disability Program Coordinator (DPC):

- Facilitates the DLA RA process and advises supervisors, managers and employees on DLAs RA process

General Counsel (OGC):

- Advise and provide legal sufficiency reviews as needed.

Human Resources (J1):

- Advise and assist with obtaining Human Resource (HR) information needed to process requests for accommodation and identify if remote requests have financial impacts for the agency or employee.

Interim Decision Authority (IDA):

- Decide for their respective organization/MSC whether to allow as an Interim RA situational telework, regular recurring telework, or remote work.

Decision Authority (DA):

- Decide for their respective organization/MSC whether to allow as a RA situational telework, regular recurring telework, or remote work that is 179 days or less.

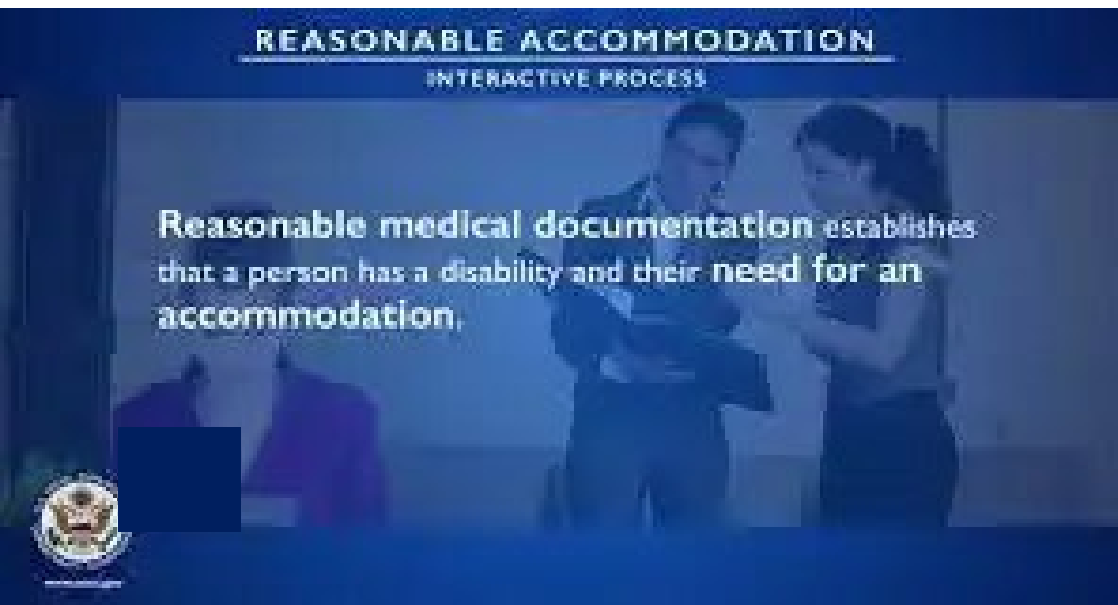
Approval Authority(AA):

- Decide for the Enterprise whether to allow as a RA situational telework, regular recurring telework, or remote work that is 180 days or more.



Medical Documentation

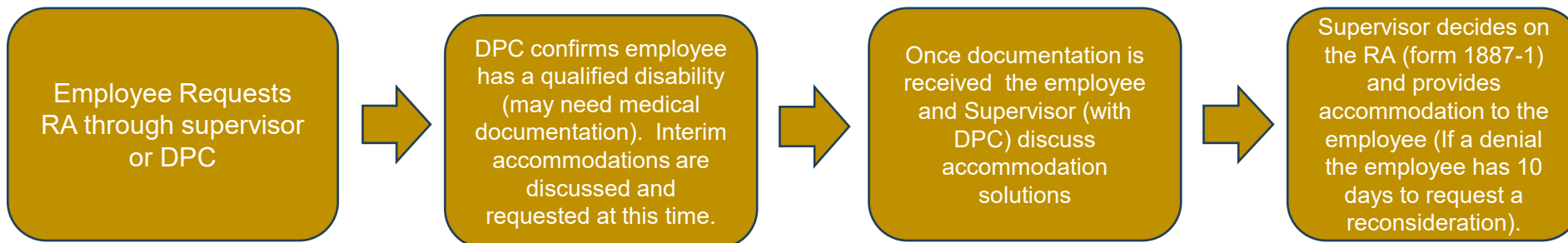
1. Is medical documentation needed to request an RA?
2. Who is responsible for requesting medical documentation?
3. Who has a need to know? **UPDATE**



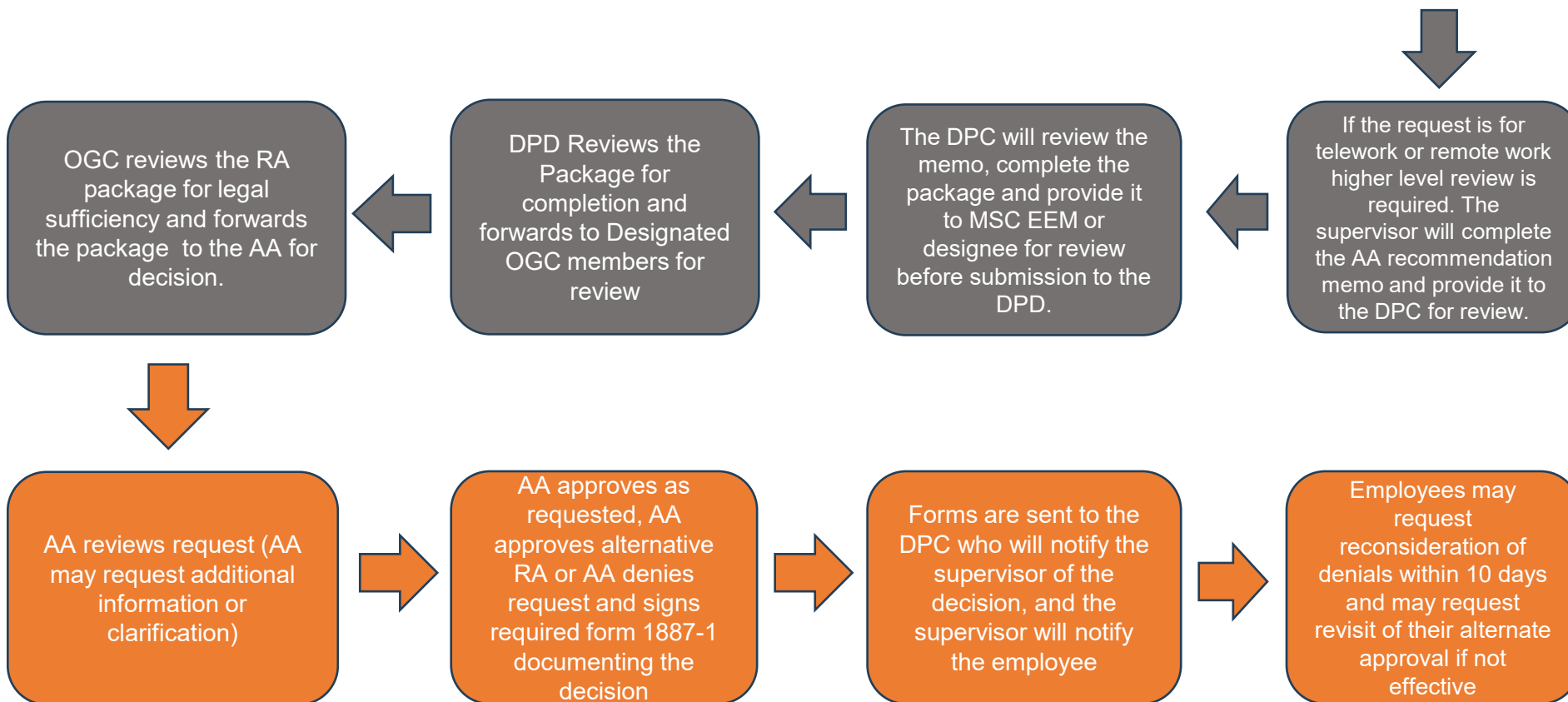


Reasonable Accommodation Process

Regular Process



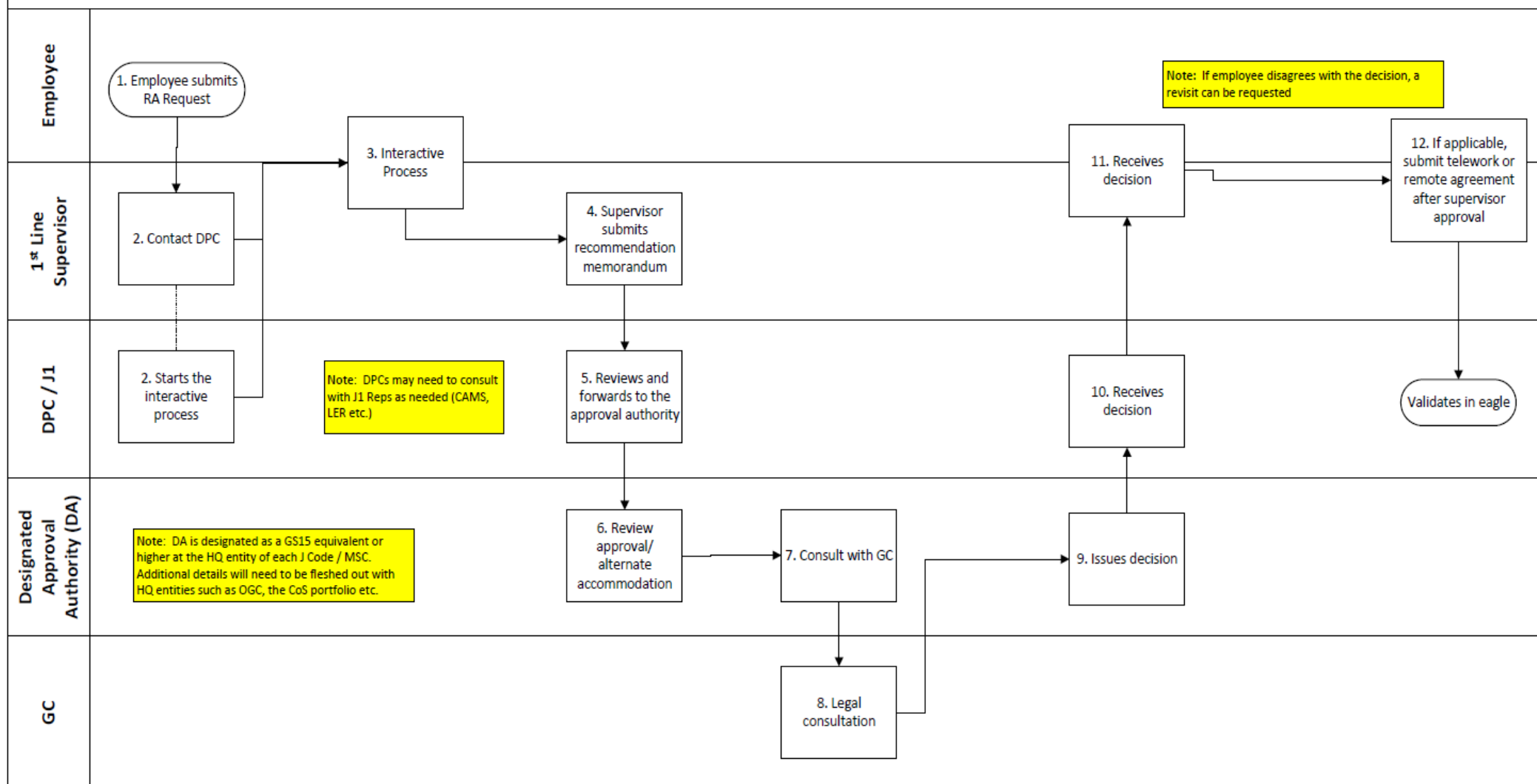
Centralized Process





Interim Process Flow Chart

Revamped Interim RA Process (5 Business Days or Less)





RA Process Documents

Supervisors

Supervisor
Checklist

1887 –
Confirmation of
Request

Interim Request
Memo to IDA

Interim Decision
Memo

Statement of
Understanding
for Management
Officials

Centralized
Process
Recommendation
Memo to AA

Recommendation
Memo to DA

1887-1 – RA
Decision and
Notice of Rights.

Revisit
Recommendation
Memo



RA Reviews

- Supervisors are responsible for monitoring the effectiveness of an employee's RA.
- Supervisors should check-in with their employees periodically, but at a minimum, on an annual basis, both the supervisor and the employee will discuss the effectiveness of the provided RA and adjust the RA when necessary.
- This does not require the employee to submit a new RA request when the disability is permanent. If additional documentation is needed the DPC will let you and your employee know.
- A memorandum for record should be completed to document the way forward and the discussion between the supervisor and the employee.



Revisits

The Revisit process allows the Agency to ensure that previously granted accommodations are still effective, appropriate, and are not an undue burden to the Agency.

The Supervisor or employee may request a revisit, by contacting the DPC.

RAs may be revisited for the following reasons

- The work environment changes;
- Business systems, operations, or the mission changes;
- The essential functions of the position change;
- The employee's functional limitations change;
- A new IT technology or device becomes available;
- Accommodation is not effective;
- Based on specified timeframes documented within the approved RA.



Reconsiderations

- An employee whose decision is denial of RA may request reconsideration of the decision within 10 business days of receiving the decision DLA Form 1887-1. If an accommodation is approved, including an approved alternative accommodation, the employee does not qualify for a reconsideration.
- A request for reconsideration must be submitted to the local servicing DPC for processing. A request for reconsideration will not extend the time limits for initiating administrative statutory, or collective bargaining claims.
- The DPC will submit the request for reconsideration to the AA within 2 business days of receipt.
- The AA has 15 business days to reconsider the requested accommodation and issue a final decision.



Reassignment as a RA

- Employees only have to minimally qualify for a position.
- Employee will complete the job preference form and provide it to the Supervisor and DPC.
- Agency must make a good faith effort to locate a position (60-day review). J1 will do 2 reviews a month (total of 4 reviews at all grade levels) and notify the supervisor and DPC of their findings.
- Reassignment is to an equivalent position, when possible, but if no equivalent position is available, may be to a lower-graded position (up to two grades lower).



Agency Certification, Reassignment and Accommodation Efforts

OPM Form 3112D

- OPM requires Agencies to document their efforts to reasonably accommodate employees on OPM Form 3112D.
- Employees will provide their completed SF3112A, SF3112B, SF3112C, form SF3112D with section one completed and any additional supporting documentation that the EEO Office does not already have on file.
- The DPC will document what the Agency has done to reasonably accommodate the employee and then certify on the OPM form 3112D.
- If no accommodation is in place the DPC will ask the employee if they would like to enter the RA process to determine if there are any accommodations that would allow them to work effectively.
- Reassignment search may need to be completed as well.
- For further guidance employees may reach out to the DLA Benefits Team.



Records Management

- RA information should never be filed with an employee's personnel record.
- The overall case file will reside within the EEO RA tracking system.
- RA files are closed and held for 3 years after the employee retires or leaves the agency unless there are pending appeals.



Key Things to Remember

- 1st line supervisors serve as decision makers for RAs that do not require higher level approval and recommending officials on RAs that require higher level approval.
- EEO Practitioners **do not** make decisions in the DLA RA Process
- DMs are not required to grant the employees' the accommodation they are requesting. Effective alternatives can be provided.
- Supervisors must engage in the interactive process with their employees.
- The **goal** of the RA process is **45** calendar days.



- Job Accommodation Network
<https://askjan.org>
- Equal Employment Opportunity Commission [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#) | [U.S. Equal Employment Opportunity Commission \(eeoc.gov\)](#)
- Employer Assistance and Resource Network
<http://www.askearn.org>
- Computer/Electronic Accommodations Program
<http://CAP.mil>
- OPM-Policy, Data, Oversight [Reasonable Accommodations \(opm.gov\)](#)
- ADA <https://www.ada.gov/>
- DLA EEO Site [Reasonable Accommodation \(dla.mil\)](#)

ADA
Americans with
Disabilities Act



Disability Program RA Mailbox Contact Information

MSC	LOCATION	MSC RA MAILBOX
AVIATION	Richmond, VA	Avn.eeo.ra@dla.mil
DISPOSITION SERVICES	Battle Creek, MI	Dispositionservicesras@dla.mil
DISTRIBUTION	New Cumberland, PA	Distribution.ra.requests@dla.mil
ENERGY	Fort Belvoir, VA	EnergyReasonableAccommodations@dla.mil
HEADQUARTERS	Fort Belvoir, VA	HQsReasonableAccommodations@dla.mil
LAND & MARITIME	Columbus, OH	Dsccreasonableaccommodationsrequest@dla.mil
TROOP SUPPPORT	Philadelphia, PA	TSReasonableAccommodations@dla.mil

Note: An employees servicing DPC is determined based on their duty location and the MSC closet to them. For example, if an employee is located at Fort Belvoir, then they would send the request to the HQs mailbox unless of course they are an Energy employee located at Fort Belvoir. In this situation they would send their request to the Energy mailbox. All questions or requests pertaining to RAs should be sent to the mailboxes provided above and a DPC will assist with getting the employee to the correct POC.

