

Centralized Accommodation Programs (CAP) in Practice

Creating a culture where applicants and employees feel comfortable requesting accommodations needed to perform at their best usually leads to positive experiences for all employees, including employees with disabilities. While companies are required by law to provide reasonable accommodations, easy access to accommodations for both applicants and employees also demonstrates your organization's commitment to inclusion. Key to fostering such a disability-inclusive workplace is the adoption of straightforward policies and processes for providing effective and cost-efficient reasonable accommodations. A proactive practice in this regard is the establishment of a centralized accommodation program (CAP), which can:

- Streamline your company's accommodation process by consolidating subject matter expertise necessary to assess, evaluate, and implement effective and meaningful accommodations.
- Ensure funding streams for some or all accommodations at a level removed from the department or unit in which the individual is working thus removing department level disincentives to accommodate.

The design of centralized accommodation program is flexible. A CAP may serve a consultative role with accommodation funding decisions across business lines. A CAP may also be a single office for negotiating and funding accommodations. Choosing a model that works best for an organization depends on its size, scope, and internal processes. As a complement to *Increasing Disability Inclusion: Centralized Accommodation Programs as a Best Practice*, this checklist was designed to help identify essential components of an effective CAP. With top leadership buy-in and stakeholder input from multiple channels, these key considerations can be used to develop a successful centralized accommodation program.

Key Considerations of Program Design

Detail the overall scope of CAP program. Decide if you are centralizing expertise, accommodation processes, funding, and tracking.

Acquire top leadership commitment for CAP.

Determine subject matter expertise within or outside the company to lead the effort.

Establish team lead for accessing information from all departments involved in the CAP process, including benefits, IT, facilities management, legal, and return to work.

Develop reasonable accommodation guidelines, policies, and procedures for all staff.

Decide if CAP should reside at the centralized corporate level or at a decentralized business-line level.

Select vendors for procurement of assistive technology devices and services, interpreters, and readers.

Decide how to best communicate strategic decisions impacting privacy, information technology, and health and safety.

Review available and necessary automation to implement CAP.

Expertise and Staffing

Confirm which department will be responsible for execution of the CAP.

Determine subject matter expertise necessary to implement and maintain the program.

Identify specific expertise or technical assistance on technology accessibility issues.

Assess disability and ergonomic expertise for work adjustments, workstations, and other accommodations.

Allocate sufficient staff for implementation of the CAP.

Provide CAP team members extensive training to gain knowledge on accommodations, policies, and practices.

Identify potential consultants to gather outside experts when necessary regarding state-of-the-art accommodations

Streamlining of Processes

Adapt, maintain, and update CAP policy and standard operating procedures.

Provide training and/or materials to ensure managers and supervisors understand how to recognize a potential request for accommodation or workplace support.

Develop process to assess need for the accommodation.

Develop process to identify and provide the appropriate accommodations.

Devise a decision-making process for accommodation requests.

Establish a timeline for approving and implementing accommodation requests.

Develop a communication flow to notify all necessary personnel involved in accommodation process (e.g. supervisor, facilities, technology, etc.)

Develop process to evaluate accommodations requests to confirm they are appropriately provided and reviewed.

Develop system to ensure confidentiality of accommodation requests, functional limitations, and any medical information discussed or provided.

Funding

Determine if the CAP should have a reimbursement or cost-sharing model.

Indicate if the CAP focus should have a cost component only or when a dollar threshold is reached.

Estimate budget necessary for staffing and program implementation.

Accountability and Tracking

Determine accountability and follow up on the effectiveness of accommodations provided to applicants or employees.

Track employee technology software to ensure accessibility and applicability with any applications.

Create a system to automate and track approval and delivery of accommodations.

Create a system to address and monitor any issues or complaints related to accommodations.

Conduct analysis for evaluating accommodations enterprise-wide to identify trends and assess program efficiency.

For more information, visit EARN's <u>Reasonable Accommodations</u> webpage or read the <u>Ensure</u> <u>Productivity: Reasonable Accommodations Discussion Guide</u>. The Job Accommodation Network has also developed an <u>Accommodation Toolkit</u> for further reference.

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