



# EMPLOY MILWAUKEE POLICY 20-06: REASONABLE ACCOMMODATIONS

**POLICY: 20-06**

**SUBJECT: REASONABLE ACCOMMODATIONS**

**ISSUANCE DATE: 12/3/20**

**EFFECTIVE DATE: 12/3/20**

## REFERENCES:

29 CFR 32,38.4 through 38.10;38-54

WIOA Section 188

Section 504 of the Rehabilitation Act of 1973

Executive Order 13164

### POLICY SCOPE

- EMPLOY MILWAUKEE AGENCY
- WIOA WDA 2 SYSTEM
- WIOA TITLE I-B PROGRAM(S)
  - ADULT PROGRAM
  - DISLOCATED WORKER PROGRAM
  - YOUTH PROGRAM
- NON-WIOA ADULT PROGRAMS
- NON-WIOA YOUTH PROGRAMS

## I. BACKGROUND

Employ Milwaukee, “agency”, is firmly committed to meeting the needs of its applicants and participant population, including those with disabilities, where required and feasible. It is the policy of the agency to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is the agency policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment, or participation in programmatic activities

## II. PURPOSE

This policy statement sets out Employ Milwaukee’s policy on Reasonable Accommodations for all participants of Employ Milwaukee-administered programs. Its purpose is to ensure and provide directive that Employ Milwaukee, “agency”, and all its Subrecipients and Contracted providers will:

1. Ensure participants have the necessary services, reasonable modifications, and accommodations to successfully engage in assigned program activities; and
2. Work with employers to put needed accommodations into place for participants who are making the transition to unsubsidized employment.

## III. POLICY

If a need for assistance or changes are identified, reasonable accommodations must be made in a timely fashion.

The Job Accommodation Network (JAN) is an online resource that provides guidance on workplace accommodations and disability employment issues. Career Planners and staff may find JAN helpful when identifying and arranging accommodations for an individual.

JAN offers several ways to obtain confidential, personalized assistance, including:

A proud partner of the  **americanjobcenter** network

Employ Milwaukee is an Equal Opportunity employer and service provider. If you need this information or printed material in an alternate format, or in different language, please contact us at (414)-270-1700. Deaf, hard of hearing, or speech impaired callers can contact us through Wisconsin Relay Service at 7-1-1.

- **By Phone:** From 9 a.m. to 6 p.m. ET, customers can call JAN toll-free to speak with a workplace accommodation expert. (800) 526-7234 or (877) 781-9403 (TTY)
- **Via the Web:** [AskJAN.org](http://AskJAN.org) offers more than 300 disability-specific publications, as well as the [Searchable Online Accommodation Resource \(SOAR\)](#), which enables users to explore accommodation options for different disabilities and workplace settings.
- **On Demand:** JAN's online service provides customers with individualized e-mail responses to questions about accommodations and the ADA.

The following table provides examples of accommodations that staff and subrecipients may need to arrange on behalf of participants with disabilities. This is not an exhaustive list. The agency's subrecipient must work closely with the applicant/participant and that person's medical providers to identify the necessary accommodations.

For individuals with learning disabilities	Color-coded, written, or recorded guides, manuals, checklists, and instructions, modified computer screens/software, text-to-speech software, voice-activated recorders, Reading Pens, sound absorption panels and environmental sound machines to minimize distractions, headset/headphones to listen to music (when possible) to help concentrate, electronic organizers and calendars to stay organized, alarm watch or beeper to stay on task.
For individuals with learning disabilities (continued)	Modified assignment or reassignment for when an individual is unable to perform all of the tasks of a particular assignment, reassign to tasks the individual can perform, limit or reduce number of tasks, break down tasks or adjust time assigned to allow sufficient time to complete assigned activities. When these difficulties result from a cognitive or learning disability, provide a job coach, tutoring, or on-site assistance.
For individuals with cognitive impairments	See JAN's <a href="#">Effective Accommodation Practices Series: Cognitive Impairment</a> .
For individuals with brain injuries	See JAN's <a href="#">Effective Accommodation Practices Series: Brain Injuries</a> .
For individuals with mental health impairments (e.g. depression, personality	See JAN's <a href="#">Effective Accommodation Practices Series: Mental Health Impairments</a> .

disorders, anxiety disorders, etc.)	
For individuals with multiple chemical sensitivity.	Modified work/learning environments, alternative communication methods, air filters or purifiers, respirator masks.

<b>Disability/ Impairment</b>	<b>Accommodation Description/Examples</b>
For individuals with hearing impairment.	TTY phone lines or keyboards, sign language trainers or interpreters, vibrating pagers, captioned training tapes, assistive listening devices, telephones with video or text messaging options.
	Service animals individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, alerting individuals with impaired hearing to intruders or sounds, or providing minimal protection or rescue work.
For individuals with visual impairment or photosensitivity.	Readers, task lighting, glare guards/light filters, accessible computer equipment/software, magnifiers, large print, Braille, talking calculators, backup warning sensors.
	Service animals individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, guiding individuals with impaired vision, or providing minimal protection or rescue work.

For individuals with learning disabilities	Color-coded, written, or recorded guides, manuals, checklists, and instructions, modified computer screens/software, text-to-speech software, voice-activated recorders, Reading Pens, sound absorption panels and environmental sound machines to minimize distractions, headset/headphones to listen to music (when possible) to help concentrate, electronic organizers and calendars to stay organized, alarm watch or beeper to stay on task.
--	--

For individuals with learning disabilities (continued)	Modified assignment or reassignment for when an individual is unable to perform all of the tasks of a particular assignment, reassign to tasks the individual can perform, limit or reduce number of tasks, break down tasks or adjust time assigned to allow sufficient time to complete assigned activities. When these difficulties result from a cognitive or learning disability, provide a job coach, tutoring, or on-site assistance.
For individuals with cognitive impairments	See JAN's <a href="#">Effective Accommodation Practices Series: Cognitive Impairment</a> .
For individuals with brain injuries	See JAN's <a href="#">Effective Accommodation Practices Series: Brain Injuries</a> .
For individuals with mental health impairments (e.g. depression, personality disorders, anxiety disorders, etc.)	See JAN's <a href="#">Effective Accommodation Practices Series: Mental Health Impairments</a> .
For individuals with multiple chemical sensitivity.	Modified work/learning environments, alternative communication methods, air filters or purifiers, respirator masks.

For individuals with mobility/manual impairment.	Modified office equipment/workstations, wheelchair/scooter, stand/lean stool, anti-fatigue matting, writing aids, voice recognition software, alternative keypad/keyboard access, telephone headsets, money counters and bill and coin changers, compact material handling (lifting) devices.
	Service animals individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

For individuals with a chronic medical condition	Modified assignment or reassignment to allow the tasks to change based on the individual's condition when an activity involves a variety of tasks that the individual occasionally cannot perform due to a chronic condition. This may involve a simple shift of duties on a day-to-day basis or alternating locations. Some medical conditions may have triggers that can be reduced by using the equipment and accommodations listed in this table.
For any individual with a disability/ Impairment	<p>Modified/flexible schedule Assignment of hours must be based on information provided through formal assessment. Individuals with certain impairments may have restrictions on the number of hours they are assigned to participate.</p> <p>When formal assessment indicates that an individual's impairments may become acute at times, resulting in the need for the individual to be absent from assigned activities, good cause must be accepted without requiring further written documentation from the individual.</p> <p>For individuals with chronic conditions that are affected by environmental factors (e.g., respiratory problems, Multiple Sclerosis, severe allergies, Lupus, Reynaud's Syndrome and other conditions), individual must be given good cause for non-participation when certain conditions exist, such as air temperatures below a certain degree or air quality alert. For example, an individual relies on public transportation to get to assignments and prolonged exposure to cold will exacerbate a condition. The individual must be given good cause for non-participation at times when air temperature would affect individual's condition.</p>

#### IV. PROCEDURES

All procedural questions should be directed to Employ Milwaukee's Equal Opportunity Officer:  
 Carrie A. Hersh, Contracts Compliance Specialist  
[Carrie.Hersh@employmilwaukee.org](mailto:Carrie.Hersh@employmilwaukee.org)

---

**RECISSIONS:** ADMINISTRATIVE MEMO 18-04: REASONABLE ACCOMMODATIONS  
**BOARD APPROVAL DATE:** 12/3/20