



<b>Employ Milwaukee Administrative Memo</b>			
Issue Date	8-20-18	#	18-4
Routing	CEO	EVP	CFO
	CPO	CDO	ALL STAFF

**TO:** Employ Milwaukee Staff, Subrecipients, and Contracted Providers

**FROM:** Elizabeth Jankowski; Contracts & Fiscal Compliance Manager/ EO Officer

**RE:** Reasonable Accommodations for Employees, Applicants and Participants Policy Statement

**PURPOSE:** This policy statement sets out Employ Milwaukee’s policy on Reasonable Accommodations for all employees, as well as applicants for and 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:

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

**BACKGROUND:** Employ Milwaukee, “agency,” is firmly committed to meeting the needs of its employees, 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 and service delivery to 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 regarding application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment, or participation in programmatic activities.

**ANALYSIS:** The agency, its subrecipients, and contracted providers are responsible for documenting accommodation requests, identifying the need for the accommodation, identifying the accommodation itself and making sure that the accommodation is provided. This includes ensuring that the accommodation is provided at all assigned activities such as a basic education lab or a training or work experience site.

**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:

- By Phone: From 8 a.m. to 5 p.m. CST, 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](#) 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](#).

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The below table provides examples of accommodations that staff and subrecipients may need to arrange on behalf of individuals 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.

<b>ACCOMMODATION DESCRIPTIONS/EXAMPLES FOR DISABILITIES AND IMPAIRMENTS</b>
<b>FOR INDIVIDUALS WITH HEARING IMPAIRMENT</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
<b>FOR INDIVIDUALS WITH VISUAL IMPAIRMENT OR PHOTSENSITIVITY.</b>
<ul style="list-style-type: none"> <li>• Readers, task lighting, glare guards/light filters, accessible computer equipment/software, magnifiers, large print, Braille, talking calculators, backup warning sensors.</li> <li>• 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.</li> </ul>
<b>FOR INDIVIDUALS WITH LEARNING DISABILITIES</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Modified assignment or reassignment for when an individual is unable to perform all 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.</li> </ul>
<b>FOR INDIVIDUALS WITH COGNITIVE IMPAIRMENTS</b>
See JAN's <a href="#">Effective Accommodation Practices Series: Cognitive Impairment</a> .
<b>FOR INDIVIDUALS WITH BRAIN INJURIES</b>
See JAN's <a href="#">Effective Accommodation Practices Series: Brain Injuries</a> .
<b>FOR INDIVIDUALS WITH MENTAL HEALTH IMPAIRMENTS</b>
See JAN's <a href="#">Effective Accommodation Practices Series: Mental Health Impairments</a> .
<b>FOR INDIVIDUALS WITH MULTIPLE CHEMICAL SENSITIVITY.</b>
Modified work/learning environments, alternative communication methods, air filters or purifiers, respirator masks.
<b>FOR INDIVIDUALS WITH MOBILITY/MANUAL IMPAIRMENT.</b>
<ul style="list-style-type: none"> <li>• Modified office equipment/work stations, 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.</li> <li>• 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.</li> </ul>
<b>FOR INDIVIDUALS WITH A CHRONIC MEDICAL CONDITION</b>
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.
<b>FOR ANY INDIVIDUAL WITH A DISABILITY/IMPAIRMENT</b>

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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. 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.
- 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.

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**ATTACHMENTS:** N/A