

THE REASONABLE ACCOMMODATION PROCESS



The Rehabilitation Act of 1973 applies to the Postal Service™. The Act does the following:

- Prohibits discrimination, based on a disability, against qualified employees and job applicants.
- Imposes an obligation on the Postal Service to find reasonable ways to accommodate qualified individuals with disabilities.

The Americans with Disabilities Act Amendments Act (ADAAA) of 2008 amended the Rehabilitation Act so that it conforms to the ADAAA changes.

A Postal Service employee or someone acting on an employee's behalf may make an oral or written request for reasonable accommodation to the employee's supervisor or manager; the local manager, Human Resources; or the Reasonable Accommodation Committee (RAC). An applicant or someone acting on an applicant's behalf may make an oral or written request for reasonable accommodation to the examiner; the selecting official; the local manager, Human Resources; or as instructed in the job announcement.

The request will activate an informal, interactive process to determine if the individual is a qualified person with a disability and, if so, whether the Postal Service can provide accommodation so the individual can enjoy equal employment opportunity in the application process or in Postal Service employment.

The Postal Service will do the following:

- Contact the employee or applicant.
- Discuss the request with the employee or applicant.
- Explore reasonable accommodation.

The interactive process will take place at the earliest opportunity upon receipt of the request and the Postal Service will make a determination as promptly as possible.

Employees who are deaf or hard of hearing and require communication accommodations may submit an oral or written request to their supervisor or manager; the local manager, Human Resources; the RAC Chair; or the District Disability Coordinator. Applicants who are deaf or hard of hearing and require communication accommodations must follow the instructions in the job announcement.

If the Postal Service denies a request for accommodation, the Postal Service notifies the employee or applicant of the reason for the decision and the name of the person or office that made the decision. The Postal Service will advise the employee or applicant of the following:

- The ability to participate in any informal dispute resolution process.
- The right to file an EEO complaint.
- Any other appeal rights to which the employee or applicant may be entitled.

This poster is a general reference for information purposes. For detailed information, see Handbook EL-307, *Reasonable Accommodation, An Interactive Process*, available in the following formats:

- Hard copy from your Human Resources Office and the Material Distribution Center.
- Online on the Postal Service's intranet (PolicyNet on blue.usps.gov) and Internet (about.usps.com).



UNITED STATES POSTAL SERVICE

REASONABLE ACCOMMODATION

AN INTERACTIVE PROCESS

HANDBOOK EL-307 JANUARY 2000



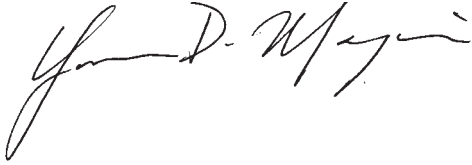
Reasonable Accommodation, An Interactive Process

Handbook EL-307

January 2000
Transmittal Letter

- A. Explanation.** This issue of Handbook EL-307, *Reasonable Accommodation, An Interactive Process*, is a complete revision and obsoletes all previously published Handbooks EL-307. This handbook replaces guidelines with policy on reasonable accommodation in employment and placement matters. It contains completely revised reasonable accommodation checklists and introduces a new Exhibit 3-1, Accommodation Procedures for Testing Applicants with Disabilities. Language contained in this handbook has been updated to reflect changes in the law.
- B. Distribution**
- 1. Initial.** Handbook EL-307 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.
 - 2. Additional Copies.** Order additional copies from materiel distribution centers (MDCs) using Form 7380, *MDC Supply Requisition*.
- C. Comments**
- Submit questions and suggestions about the content of this document in writing to:
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 - Submit questions regarding the organization or editing of this document to:
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- D. Cancellations.** All previous issues of Handbook EL-307, *Guidelines on Reasonable Accommodation*, are obsolete.
- E. Effective Date.** This handbook is effective upon receipt.

A handwritten signature in black ink, appearing to read "Yvonne D. Maguire". The signature is fluid and cursive, with a large initial "Y" and a long, sweeping underline.

Yvonne Maguire
Vice President
Employee Resource Management

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1 Introduction to Reasonable Accommodation

1-1 Policy

It is Postal Service policy to provide procedures, guidance, and instructions involving matters of reasonable accommodation, to assist managers and supervisors in meeting our legal and regulatory responsibilities in the day-to-day decision-making process, involving applicants and employees with disabilities.

1-2 Purpose

This handbook establishes procedures that will enable postal managers and supervisors to make sound employment and placement decisions in reasonable accommodation to qualified individuals with disabilities during the processes of recruitment, examination, hiring, and internal placement.

1-3 Applicable Laws

1-3.1 **The Rehabilitation Act**

The Rehabilitation Act prohibits discrimination against qualified employees and job applicants with disabilities in the federal government, including the United States Postal Service.

The Rehabilitation Act also imposes an obligation on the Postal Service to find reasonable ways to accommodate an individual with a disability so that he or she can become a productive member of the workforce. In other words, the Rehabilitation Act requires the employer to look for new or innovative ways to alter, restructure, or change the ways of doing a job in order to allow a qualified person with a disability to perform the essential functions of a particular job.

1-3.2 **The Americans With Disabilities Act**

The Americans with Disabilities Act (ADA) covers private-sector employers and the Rehabilitation Act covers public-sector employers.

1-4 **Persons Eligible for Protection Under the Rehabilitation Act**

The Rehabilitation Act protects four categories of people. Regardless of the specific category, an individual must be qualified to perform the job and show that he or she is one of the following:

- A person with a disability.
- A person with a record of a disability.
- A person associated with a person with a disability.
- A person regarded as having a disability.

1-4.1 **Determining Who Is a Person With a Disability**

To determine whether an individual is a person with a disability, two questions must be resolved:

- Does the person have a physical or mental impairment?
- If so, does that physical or mental impairment substantially limit a major life activity?

1-4.1.1 **Defining Physical and Mental Impairments**

A physical impairment can include:

- Any physiological disorder or condition.
- Cosmetic disfigurement.
- Anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory, cardiovascular, reproductive, digestive, genito-urinary, hemic, lymphatic, skin and endocrine.

Mental impairments can include any mental or psychological disorder, such as mental retardation or organic brain syndrome, and can also encompass emotional or mental illness and specific learning disabilities.

Physical and mental impairments do not include physical characteristics such as being overweight, or personality traits within the range of normal, such as poor judgment or a quick temper.

1-4.1.2 **Defining Major Life Activities**

Major life activities include such obvious characteristics as hearing, seeing, walking, speaking, caring for oneself, performing manual tasks, and breathing. Generally, a major life activity is something of fundamental significance within the meaning of the Rehabilitation Act, and not simply an activity important to a particular individual. It includes learning and working,

but does not include activities such as swimming, shopping, or enduring physical stress.

It is important to note that where individuals claim that they are limited only in the major life activity of working, they must show that they are significantly restricted in their ability to perform either a class of jobs, or a broad range of jobs in various classes, as compared to the average person having comparable training, skills, and abilities.

1-4.1.3 **Defining *Substantially Limits* Criteria**

An impairment *substantially limits* a major life activity if that impairment renders the individual either unable to perform a major life activity or significantly restricts his or her performance of that activity as compared to the average person's performance of the activity.

Not all medical conditions are substantially limiting. A person with broken bones or a sprained ankle does not have a permanent long-term impairment because the condition will heal within a reasonable time. Similarly, a woman who has a normal pregnancy (and related conditions) does not have a permanent medical condition and therefore does not meet the definition of a person with a disability. In addition, if an individual employs measures to mitigate his or her impairment (e.g., medication, eyeglasses) the effect of those measures should be considered in determining whether an impairment is substantially limiting as to that individual.

Some permanent impairments are not substantially limiting. A back condition that places lifting restrictions of 30 or more pounds has been deemed not to be a substantially limiting condition. Other examples of permanent impairments that do not constitute a condition that substantially limits a major life activity are:

- Employees who complain that they cannot get along with their supervisors.
- Simple obesity.
- Allergies to a particular substance used only in a particular job or type of job.

1-4.2 **Determining Who Is a Person With a Record of a Disability**

A person with a record of a disability is someone who does not now, but sometime in the past, had a medical condition that at that time substantially limited a major life activity. Examples of persons with a record of a disability may include:

- Someone who suffered from cancer but whose cancer is in remission.
- A person who had repeated hospitalizations and numerous periods of leave for a long term or permanent ailment.

1-4.3 **Determining Who Is a Person Associated With a Person With a Disability**

The law prohibits discrimination against persons who are associated with or take care of a person with a disability. An employer may not refuse to hire a person simply because he or she must take care of a spouse or family member who has a disability or because he or she volunteers to work at a clinic or hospital.

1-4.4 **Determining Who Is a Person Regarded as Having a Disability**

The Rehabilitation Act protects a person who the employer erroneously believes has an impairment that substantially limits a major life activity. An applicant for a letter carrier job who has a limp may be regarded as having a disability if the hiring official concludes without any inquiry that the applicant could not walk the full route. In this case, the applicant may be erroneously regarded as having a disability because there is no individualized basis or medical support for concluding that the applicant cannot perform the major life activity of walking.

There is a significant difference between erroneously regarding a person as having a disability and finding a person medically unsuitable for a job. It is legal for a hiring official to conclude, based on current medical data, that the person has a medical condition that prevents him or her from performing an essential function of the job. If the medical records show that the job applicant for a city carrier job cannot walk more than 50 feet, then the hiring official can legitimately conclude that the person cannot perform the requirements of the job in an urban environment even with reasonable accommodation and can refuse to hire him or her.

1-4.5 **Determining Who Is a *Qualified Person***

To be protected under the Rehabilitation Act, an individual must also be a “qualified person” for the job. In other words, the person must meet both the job prerequisites and be able to perform the essential functions of a job safely, with reasonable accommodation if necessary, just like any other employee. Therefore, a person seeking a truck driver job must have a valid driver’s license, and an applicant for a data conversion operator job must have the ability to type.

1-4.6 **Determining *Direct Threat***

An individual is not a “qualified person” for the job if his or her performance in the job would subject them or others to a direct threat of harm. Direct threat means a significant risk of substantial harm to the health or safety of the person or others that cannot be eliminated by reasonable accommodation. The risk of harm *must* be more than just speculative or hypothetical. There must be a high probability of verifiable, substantial harm.

To this end, a determination that a person poses a direct threat to the health and safety of himself or herself, or others, must be supported by objective, factual medical or scientific evidence. Determining whether an employee poses a significant risk of substantial harm to himself or herself or others must be based on an individualized assessment of that person's ability to perform safely the essential functions of the job, in light of the following factors:

- The nature and severity of the potential harm.
- The duration of the risk.
- The likelihood that the potential harm will occur.
- The imminence of the potential harm.

In assessing the degree of risk, you will want to consider:

- Input from the applicant or employee.
- The experience of the applicant or employee in prior similar jobs.
- The opinions of medical experts, rehabilitation counselors, and physical therapists.
- The opinions of engineering or other such job specialists, when needed.

Remember, in determining whether the individual poses a risk of substantial harm, you must also consider whether any reasonable accommodation would reduce the direct threat of harm to an acceptable level.

1-4.7 **Determining the Essential Functions of the Job**

The essential functions of a job are those which define the job. The job exists, in other words, to perform those tasks. They are not the marginal and infrequently performed tasks which could be eliminated without altering the fundamental nature of the job. Those items which you should consider in defining the essential functions of the job are outlined in 2-2.1.

1-5 Requirements to Provide Reasonable Accommodation

1-5.1 **Goal**

The purpose of reasonable accommodation is to enable individuals with disabilities to perform the essential functions of the job.

1-5.2 **Determining What Is Reasonable**

An accommodation is reasonable when its costs and impacts are not disproportionate to its benefit and when it enables the applicant or employee with a disability to perform the essential job functions.

An accommodation is not reasonable when it requires the elimination of legitimate selection criteria, lowers standards of performance or production,

creates a job where none exists, violates the seniority provisions of a collective bargaining agreement, reallocates or eliminates essential job functions, or otherwise substantially changes the fundamental nature of a job.

See Chapter 2 for detailed information.

1-5.3 **Determining What Is Undue Hardship**

The law does not require an employer to provide any and every accommodation an applicant or employee requests. The employer is only required to provide those accommodations that would allow the individual to perform the essential functions of the job. Accommodations that impose an undue hardship on postal operations are not required.

1-5.3.1 **Examples of Undue Hardship**

Expense: Accommodations that are unduly costly and require expenditure of significant sums of money are generally not required.

Factors establishing hardship based on cost are:

- Nature and cost of the accommodation.
- Overall financial resources of the facility and the number of persons employed.
- Effect on expenses and resources.

Fundamental Alteration of the Nature or Operation of the Business: Accommodations that would change the fundamental nature of the employer's business operations are generally not required.

Factors establishing hardship based on fundamental alteration are:

- Type of operations conducted.
- Composition, structure, and functions of the workforce.
- Geographic separateness and administrative or fiscal relationship of the facility in question to the employer.

Impacts of the accommodation upon the operation of the facility are:

- The ability of other employees to perform their duties.
- The facility's ability to conduct business.

1-5.4 **Reducing the Direct Threat**

The law does not require an employer to adopt an accommodation if it will not either eliminate or reduce the direct threat of substantial harm to the individual or others to acceptable, reasonable safety levels.

1-6 Other Laws

Although a person may not qualify for reasonable accommodation under the Rehabilitation Act, he or she could still be entitled to the benefits of other laws, rules, or regulations. A pregnant employee may not be covered by the Rehabilitation Act, but she may be eligible for leave protection under the Family and Medical Leave Act (FMLA).

Similarly, there are times when an employee may be covered by the Rehabilitation Act and other laws. An employee who sustains permanently disabling injuries on the job may be protected by both the Rehabilitation Act and the Federal Employee Compensation Act (FECA), and an employee with a permanently disabling serious health condition may be covered by both the Rehabilitation Act and the FMLA. The criteria for any one of the three statutes can be met simultaneously.

2 The Reasonable Accommodation Process

2-1 Questions About Reasonable Accommodation

Questions concerning reasonable accommodation arise in basically two instances:

- When you are deciding whether a job applicant will be able to perform the job with or without reasonable accommodation.
- When an employee requests reasonable accommodation in order to perform his or her current job.

In either case, you must go through a four-step process to determine whether to provide an accommodation to the job applicant or the employee. Those steps are to do the following:

- Determine the essential functions of the job.
- Identify the abilities and limitations of the individual.
- Identify potential accommodations.
- Determine the reasonableness of the accommodations and select options.

Each step is discussed in detail in 2-2 below.

Remember, this interactive process may require you to consult and work with a number of different people, including the individual, medical and safety personnel, human resources and rehabilitation specialists, supervisors, and managers.

The four-step interactive process is not required if it is definitively clear an individual is not a qualified individual with a disability, i.e., temporary condition such as pregnancy, broken leg, etc. (see 1-4.1.3).

2-2 The Interactive Process

2-2.1 Step One: Determine the Essential Functions of the Job

Your starting place in the reasonable accommodation process is to identify the essential functions of the job. The term *essential functions*: 1) is defined as the fundamental job duties of the employment position the individual with a disability holds or desires; 2) is exclusive of the marginal functions of the position.

A job function may be considered essential for any of several reasons, including but not limited to the following:

- The function may be essential because the reason the position exists is to perform that function.
- The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed.
- The function may be highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.

Evidence of whether a particular function is essential includes, but is not limited to the following:

- The employer's judgment regarding a determination as to which functions are essential.
- Written job descriptions.
- The amount of time spent on performing the function.
- The consequences of not requiring the incumbent to perform the function.
- The terms of a collective bargaining agreement.
- The work experience of past incumbents in the job.
- The current work experience of incumbents in a similar job.
- Actual duties performed by person holding the job.

The essential functions of the job are determined on a case-by-case basis. Do not presume that any two postal jobs are necessarily alike. The actual responsibilities of a mail handler may vary depending on the tour, operation, mail volume, and the age and configuration of the plant. Similarly, the actual lifting responsibilities for a carrier at a level 13 post office may differ from the lifting responsibilities of a carrier at a level 20 post office.

Job descriptions, job preview videos, and job announcements can assist you in determining the essential functions of the job. However, these may only generically describe the requirements of the job. It may be necessary to interact with others to ascertain beyond written descriptions the actual essential functions of the particular job in your facility.

2-2.2 **Step Two: Identify the Abilities and Limitations of the Individual**

The next step in the accommodation process continues the interactive process to determine the physical and mental abilities of the employee or job applicant. Of course, the individual is usually best able to tell you what he or she can and cannot do. Therefore, discuss the job with the individual.

2-2.2.1 **Gaining the Individual's Participation**

The following are examples of questions that may be modified, as appropriate, and used to gain the individual's participation in the reasonable accommodation process:

- At the present time, these duties are performed in this manner. Can you tell or show us how you can achieve the same results?
- This equipment is used on a regular basis in this manner. Can you show us how you would use it to complete the task?
- Historically, this job has been done using this sequence and method. Do you feel you could accomplish the same results in this or in another way?
- This is the normal arrangement of the work area. Do you have any suggestions regarding changes or modifications that may be necessary to permit you to perform the job?

2-2.2.2 **Job Applicants**

After (and only after) making a bona fide job offer to an applicant should a medical assessment be scheduled to assist you in defining an applicant's abilities and limitations. The applicant's physician or Postal Service medical personnel may not necessarily know the functions of a particular job. Accordingly, you should verify that the risk assessment is based on a complete understanding of the functions of the job. You should also discuss with both medical personnel and the applicant whether any accommodations can be made. Other important sources of information that will assist you in defining the individual's abilities and limitations include past medical records, current medical exams, and past work history.

Do not make medical inquiries or schedule medical assessments before making a bona fide job offer!

2-2.2.3 **Employees**

For employees requesting reasonable accommodation, consider medical information that their physicians may provide to determine job-related limitations and how they could be overcome. Other important sources of information that will assist you in defining the employee's abilities and limitations include past medical records, current medical examinations, and past work history. It may be necessary to schedule a medical evaluation to obtain a better understanding of the employee's abilities and limitations.

2-2.3 **Step Three: Identify Potential Accommodations**

Once you have identified the essential functions of the job as well as the individual's abilities and limitations, you are then in a position to determine:

- Whether the person can perform the essential functions of the job.
- If not, whether accommodations can be made to enable the person safely to perform those functions.

To identify potential accommodations, consult with a number of people. First, you should ascertain from the job applicant or employee what he or she thinks is needed to enable him or her to perform the job. Second, you will need to consult with operations, safety and/or medical personnel, as appropriate, to determine whether the employee's proposed accommodation is feasible or whether other accommodations can be made. You may also want to seek guidance from people outside the Postal Service, particularly state agencies and nonprofit organizations dedicated to assisting people with disabilities in the workplace, to identify potential accommodations.

2-2.4 **Step Four: Determine the Reasonableness of the Accommodations and Select Options**

Once potential accommodations are identified, it is your responsibility to determine whether the potential accommodations are reasonable. Consider whether the proposed accommodation would:

- Eliminate or alter the essential functions of the job.
- Impose an undue hardship on the Postal Service.
- Violate the terms of a collective bargaining agreement.
- Fail to eliminate or reduce the direct threat of harm.

Consider the individual's preferences, the effectiveness of each accommodation and its cost. Select the accommodation most appropriate for both you and the individual. The chosen accommodation need not be the *best* or most expensive, or even the one preferred by the individual. So long as it is reasonable and enables the individual to perform the essential functions, it is acceptable. The ultimate decision concerning what, if any, accommodation to adopt is made by the employer.

2-2.4.1 **Altering the Essential Functions of the Job**

Sometimes an accommodation involves a job restructuring or altering the nonessential requirements of a particular job. The law, however, does not require the employer to change or alter the essential functions of a job. For example, an essential function of a postal police officer at a particular location is the ability to read identification cards. It would be unreasonable for an applicant with a visual impairment to demand that the Postal Service hire a reader to assist him or her so that the cards can be read. Under the law, the employer is not required to reallocate the essential functions of the job to another individual. In this case, reading is an essential function. If reading were only a minor or unimportant aspect of the job, some form of accommodation would be in order.

2-2.4.2 **Identifying Undue Hardship**

An accommodation is not reasonable if its implementation would impose an undue hardship on the Postal Service. Undue hardship in this context means a significant difficulty or expense in providing the accommodation.

Factors to consider in determining whether an undue financial hardship exists are, among others:

- The nature and cost of the accommodation.
- The overall financial resources of the facility.
- The number and composition of the workforce at the facility.
- The effect on expenses and resources.

An accommodation can also impose an undue hardship when it alters the fundamental nature of the business or operations. Factors to consider in this context include the:

- Type of operations conducted.
- Composition and functions of the workforce.
- Geographic separateness and administrative or fiscal relationship of the facility to the Postal Service.
- Impact upon the operations of the facility, specifically compliance with safety rules and policies.
- Impact on other employees' abilities to perform their jobs.
- Impact on the facility's ability to conduct business.

There must be a strong fact-based analysis underlying an undue hardship determination. Speculation about the effects of accommodation or generalizations are not acceptable.

2-2.4.3 **Determining the Impact on Collective Bargaining Agreements**

The Postal Service is not required to adopt an accommodation that would violate the terms of a collective bargaining agreement. Accordingly, if the accommodation involves a job restructuring, job reassignment, work schedule modification, or placement in a light-duty job, you must determine whether the proposed accommodation would violate the terms of a collective bargaining agreement.

2-2.4.4 **Minimizing Safety Hazards**

In some situations, a job applicant's or employee's disability may subject the employee, applicant, or others to a direct threat of harm. Employees who have a mental impairment that causes them to black out frequently and unexpectedly may pose a substantial safety hazard to themselves or others.

See 1-4.6, Determining Direct Threat.

In this situation, you must determine whether the accommodation would minimize the risk of harm to an acceptable level. If no accommodation can adequately minimize or eliminate the risk, then the employer can deny employment to the job applicant or take other appropriate action concerning the employee. Of course, before concluding that a person poses a direct threat of harm with or without reasonable accommodation, you should verify that your conclusion is based on recognized scientific and medical data.

2-3 **Accessibility of Facilities**

The Postal Service's policy, as prescribed by federal law, is to provide accessibility for all individuals with disabilities, employed or to be employed, by making any required alterations to specific buildings where they work. (Detailed guidance on facility accessibility for individuals with disabilities is contained in Postal Service Handbook RE-4, *Standards for Facility Accessibility by the Physically Handicapped*.)

3 Reasonable Accommodation in the Examination Process

3-1 Special Needs of Test Applicants

Postal applicants and incumbents with disabilities may seek accommodation in examinations. For convenience, the term *applicant* is used throughout this chapter to refer to any individual, including postal incumbents, taking any type of postal examination.

Most of the hundreds of thousands of job applicants and current employees taking various postal examinations annually do not need accommodation in the testing process. However, for some qualified applicants with disabilities, the examination may serve as an artificial barrier to the demonstration of the knowledge, skills, and abilities required for performance of the essential functions of the job. In these instances, the Postal Service will endeavor to provide reasonable accommodation to qualified individuals with known disabilities to enable participation in the competitive examination process.

Accommodations *must* be considered on a case-by-case basis. When the Postal Service becomes aware of an applicant's disability, *flexible, interactive dialogue* with the applicant must be pursued to ensure compliance with applicable statutes and to fulfill the Postal Service commitment to ensuring equal employment opportunity regardless of disability.

Some routine activities that may require additional time and special attention include issuing test materials, giving instructions, and answering questions. Special attention will be required for applicants with assistive animals (e.g., guide dogs) to provide for the physical needs of the animals.

3-2 Postal Service Examination Policy for Applicants With Disabilities

Examinations include all written, oral, performance, and other tests.

Consistent with applicable statutes and its own policy of providing equal employment opportunity, the Postal Service has maintained a policy of making reasonable accommodation for the known disabilities of qualified job applicants in examinations when such assistance is requested and to the extent the accommodation does not impose an undue hardship on the Postal Service.

Such accommodation is provided on a case-by-case basis and determined by field office staff responsible for conducting the examination.

This policy provides a framework for those individuals who must make decisions concerning reasonable accommodation in the testing process for applicants with disabilities. This accommodation takes into account the nature and severity of the disability, the type of examination or selection process being administered, and the resources available to the local postal hiring or examination office.

This policy *must* be tempered in each situation by the specific needs of the applicant with a disability, the essential functions of the job applied for, the nature and purpose of the test or selection procedure, and the limitations of local resources.

Postal Service policy is to treat all applicants fairly and equitably. However, if a disability would reduce an applicant's opportunity to demonstrate that he or she possesses the knowledge, skills, and abilities needed to perform the essential functions of the job sought, *and* the applicant makes it known that assistance is needed, the Postal Service will endeavor to make reasonable accommodation. Accommodation that would impose an undue hardship on Postal Service programs is not considered *reasonable*.

3-2.1 Maintaining the Competitive Nature of the Examination Process

Examinations are given to measure job-related knowledge, skills, and abilities. One use of test scores is to compare the performance of individual competitors for purposes of making employment decisions. Care must be taken to ensure that accommodations do not affect an individual's score to the extent that it cannot be compared meaningfully to the scores of other competitors. Therefore, any proposed accommodations or changes in the testing process that may affect the meaning or interpretation of test scores must be approved by the manager of Selection, Evaluation, and Recognition. This will ensure that the competitive nature of the selection process and the validity of the test is not compromised.

3-2.2 **Preserving the Examination's Effectiveness as a Measurement Tool**

Tests and other selection procedures are designed to measure the knowledge, skills, or abilities needed to learn or perform a job. Therefore, the test or method of administration will not be changed if the proposed accommodation fundamentally alters what is being assessed. This is provided for in relevant statutory guidance:

"This provision does not apply to employment tests that require the use of sensory, manual, or speaking skills where the tests are intended to measure those skills. Thus, an employer could require that an applicant with dyslexia take a written test for a particular job if the ability to read is the skill the test is designed to measure. Similarly, an employer could require that an applicant complete a test within established time frames if speed were one of the skills for which the applicant was being tested." (29 CFR 1630)

For example, time extensions are frequently proposed as testing accommodations. To the extent that the test is intended to measure speed of performance, the allowance of more time is not appropriate. Such an accommodation would render the test score useless as an indicator of true ability when compared to the scores of those who took the test under stricter time limits.

3-3 **Determination of Reasonable Accommodation**

Accommodations must be determined on a case-by-case basis. Therefore, an approved or recommended accommodation is applicable in that case only and additional requests from other persons, however similar, must be considered separately.

Because individuals with disabilities (even those with the same type of disability) can, and often do, differ greatly in their needs and capabilities, any attempt to list all the different types of reasonable accommodations that might conceivably be developed for each type of mental or physical disability would be futile. Therefore, each request must be considered on a case-by-case basis and evaluated on its own merits.

Whether the accommodation is determined locally or in consultation with Headquarters, the process is the same. It involves interacting with the applicant to obtain the information needed for a reasonable and appropriate accommodation.

The primary concern in determining the appropriateness of a modified test administration is whether the proposed change compromises the accurate assessment of an applicant's job skills or abilities. The goal is to provide applicants with disabilities an equal opportunity to demonstrate their qualifications without undermining the validity or competitive equity of the testing process.

3-3.1 Applicant Responsibilities

3-3.1.1 Requesting a Reasonable Accommodation in Examinations

An applicant who needs an adjustment to or change in the testing process because of limitations caused by a disability should request such accommodation well in advance of the scheduled testing session.

Applicants are responsible for submitting a request for accommodation as soon as the need for the accommodation is known.

In order to determine whether such a request is appropriate, documentation of the need for accommodation is required. Applicants must provide relevant, specific information as to the nature and severity of the disability or impairment. Sufficient information may depend on the type of the disability. Some physical disabilities, for example, are far more obvious than learning disabilities. Applicants need to be guided concerning what documentation is necessary. Relevant documentation may include:

- Information on how the disability or impairment would affect performance on the examination (i.e., the specific test behaviors affected by the disability).
- The specific accommodation the applicant is requesting.
- Supporting documentation from a *bona fide* expert source (e.g., licensed professional, state department of rehabilitation, approved agency, etc.).

Applicants must provide additional information upon request when that information is needed to determine the appropriate accommodation. Responses to requests for accommodation may be delayed if applicants fail to provide the required information in a timely manner.

3-3.2 Postal Service Responsibilities

The Postal Service is responsible for ensuring the competitive nature and validity of the selection process while at the same time providing reasonable accommodation to qualified applicants with known disabilities when such accommodation is requested.

Throughout this process, the Postal Service must engage in a *flexible, interactive process* to clarify what the applicant needs and identify an appropriate reasonable accommodation.

In cases where the competitive nature and validity of the test is not likely to be affected (e.g., site accessibility), the local human resources staff works out what accommodation, if any, will be provided. When there is some question as to whether providing a requested accommodation would preclude the valid assessment of the applicant's qualifications, forward the request to

the manager of Selection, Evaluation, and Recognition for final determination.

Once human resources has become aware of an applicant's desire for a testing accommodation:

- Review the documentation submitted by the applicant.
- Discuss both the testing process and the jobs with the applicant to ensure the applicant's familiarity with what is required.
- Obtain any needed additional documentation from the applicant, consider possible accommodations, and decide which accommodation to implement.
- Determine if an accommodation can be provided locally without further consultation (i.e., the accommodation would not affect the competitive nature or validity of the examination.)
- If local accommodation is feasible, offer it to the applicant.
- Note the accommodation provided on Time Record Sheet when examination is administered.
- If the applicant does not accept the accommodations that can be implemented, document the rejection and the reasons for the rejection.
- If an accommodation cannot be determined locally, submit all requisite documentation to the manager of Selection, Evaluation, and Recognition at Postal Service Headquarters.
- Upon receipt of response from the manager of Selection, Evaluation, and Recognition, offer a recommended accommodation (if any) to the applicant and submit approval (*Authorization to Modify Test Administration*) with the Time Record Sheet when the examination is given.
- If the applicant does not accept the accommodations that can be implemented, document the rejection and the reasons for the rejection.

3-3.2.1 **Accommodations That Do Not Affect Competitive Nature or Validity of the Selection Process**

Some accommodations may be made locally without further consultation if they do not affect the competitive nature or validity of the selection process. Examples of accommodations that can usually be made locally without prior approval from the manager of Selection, Evaluation, and Recognition are described in 3-3.2.1.1 and 3-3.2.1.2 below.

3-3.2.1.1 **Accessibility Accommodations**

Any request for accommodation involving accessibility of the testing site should be addressed locally. This includes, but is not limited to, access to the Postal Service activity or operation as provided by law, assistance inside the testing site, etc. It also includes providing alternative seating arrangements as needed (e.g., an individual in a wheelchair may need to be seated at a table rather than at a student desk). In some cases, it may be necessary to schedule a separate session to ensure that applicants are tested in an accessible site.

3-3.2.1.2 **Other Accommodations**

The following are other types of accommodations that may be provided at the local level without further consultation.

Any accommodations provided must be documented on the Time Record Sheet consistent with the Directions for Conducting (DFC).

- Alternate test dates.
- Individual sessions.
- Individual monitors.
- Frequent breaks (between test parts only).
- Special lighting.
- Special seating arrangements.
- Sign language interpreter.
- Miscellaneous personal assistance (e.g., turning pages, marking answers).

See Exhibit 3-1, Accommodation Procedures for Testing Applicants with Disabilities.

Implementation of any one or a combination of these measures may be appropriate for individual applicants depending on their needs, the nature of the selection procedure or examination material used, and the essential functions of the job sought. If the requested accommodation is not on the above list, see 3-3.2.2.

3-3.2.2 **Accommodations That May Affect Competitive Nature or Validity of the Selection Process**

A proposed accommodation that may affect the competitive nature or the validity of the selection process must be reviewed and approved by the manager of Selection, Evaluation, and Recognition. This includes any deviation from standardized testing procedures prescribed in the examination *Directions for Conducting* (DFC).

In circumstances where there is a question about whether providing a proposed accommodation would interfere with the valid assessment of the applicant, a request for accommodation should be submitted by human resources personnel in writing to the manager of Selection, Evaluation, and Recognition with all the necessary documentation. Documentation should be sufficient to establish that:

- The applicant, in fact, has a disability as defined by federal law.
- The disability interferes with the valid assessment of the knowledge, skills, or abilities covered by the test.
- A diagnosis, if any, is provided by an appropriate professional or expert source.

3-3.3 **Accommodations That May Not Be Reasonable**

The Postal Service will provide reasonable accommodation in examinations to qualified applicants with known disabilities except in cases of undue hardship. Normally, the following would constitute an undue hardship:

- The purchase or rental of specialized equipment or services on a one-time basis or for limited use by very few applicants at great expense.
- The postponement of announcing or administering an examination to accommodate the needs of an applicant with a disability.

Note: This does not prohibit establishing an alternate date for those persons.

- Any action in violation of the collective bargaining agreements.

3-3.4 **Other Examination Accommodations**

Although most requests for accommodation in examinations will involve written tests, it is important to realize that other types of assessment procedures commonly used by the Postal Service may present serious difficulties for certain individuals. Other frequently used examination types, and examples of the kinds of accommodation which may be needed are shown in 3-3.4.1 through 3-3.4.4 below. This listing is not intended to be all inclusive, but only representative of the range of acceptable accommodations which might be considered in particular situations.

3-3.4.1 **Interviews**

Interviews may pose problems for some deaf and hard of hearing individuals and for those with certain kinds of speech challenges. Every effort should be made to determine the communication abilities of these individuals. In addition, it may be appropriate for review committee members to give a written copy of interview questions to deaf or hard of hearing applicants to read prior to the interview.

See Exhibit 3-1, Accommodation Procedures for Testing Applicants with Disabilities.

3-3.4.2 Performance Tests

The manager of Selection, Evaluation, and Recognition must approve any modifications or adjustments to performance examination material.

Employment supervisors, or their designees, must consider the physical needs of the applicant with a disability taking performance tests just as they do for written tests. Because performance tests generally approximate tasks found on the job, modifications or adjustments to test material or the procedures used to administer these tests must be carefully analyzed before implementation. Only those accommodations that do not compromise the competitive nature and validity of the testing process will be considered.

3-3.4.3 Applications, Supplemental Applications, and Employment Questionnaires

Applicants with disabilities may need assistance when completing applications, experience supplements, or other questionnaires. Human resources staff must be alerted to the possibility of requests for such assistance, and its cooperation solicited.

3-3.4.4 End of Training Examinations

Requests for accommodation for *end of training* examinations that cannot be resolved at the local level must be submitted to the manager of Selection, Evaluation, and Recognition who will coordinate with appropriate functional departments.

Exhibit 3-1 (p. 1)

Accommodation Procedures for Testing Applicants With Disabilities

The Postal Service provides applicants with disabilities reasonable accommodation in taking examinations. Our obligation to provide reasonable accommodation extends to ensuring the examination site is accessible to individuals with disabilities. Since many applicants with disabilities are potentially able to compete in our competitive selection process, it is critical that we provide reasonable accommodation in examination administration to ensure accessibility to our competitive process.

Review and Update Applicant Notices

Applicants are responsible for requesting accommodation in the testing program well in advance of the test date. Applicants must explain and document, in as much detail as necessary, the nature of their disability and the accommodation they wish to receive. It makes good business sense to advise applicants of this fact as early as possible so accommodation requests can be reviewed prior to the actual examination date. Ensure compliance by:

- Placing the following instructions in *Applicant Notices* that are included in test scheduling packages to explain to applicants the procedure to use to request a testing accommodation.

“TESTING ACCOMMODATIONS FOR PERSONS WITH

DISABILITIES: If you have a disability that will require a special testing arrangement, please submit a written request to the address below specifying the accommodation requested and providing documentation supporting the existence of the disability and the need for the accommodation requested. Include the date and time for which you are scheduled to take the examination. Requests for testing accommodation not submitted in advance may result in the postponement of your scheduled examination.”

- Including the following additional information in the *Applicant Notice*:
 - Contact person and telephone number to answer inquiries. It is strongly recommended that you provide a TTY number for the deaf or hard of hearing to communicate questions or concerns.
 - Address to submit requests for testing accommodation and accompanying documentation.

Review Requests for Testing Accommodations

- Read and review Chapter 3 of this handbook.
- Review all accommodation requests for which there is appropriate documentation or where the disability is obvious. Evaluate and determine appropriate accommodations on a case-by-case basis.
- Be cognizant of the fact that many disabilities require only simple accommodations. For example, an individual in a wheelchair may only need safe accessibility into the testing facility and a table that can accommodate a wheelchair so the applicant can take the examination.

Exhibit 3-1 (p. 2)

Accommodation Procedures for Testing Applicants With Disabilities

Prepare for the Examination

- If reasonable accommodation is possible but, through no fault of the applicant, the Postal Service cannot provide that accommodation on the regularly scheduled test date, schedule the applicant for an alternate test date as soon as practicable to ensure the applicant an equal opportunity in the pre-hiring process.
- Ensure that appropriate arrangements are made to accommodate requests not requiring a change to the examination schedule. For example, provide a table for a wheelchair applicant rather than a student desk.
- It is recommended that deaf or hard of hearing applicants be offered an opportunity to attend an orientation session where possible accommodations are fully explained and their exact needs may be more appropriately addressed. Some deaf applicants may be more comfortable sitting near the examiner to read lips unobstructed, rather than using an interpreter. If an orientation session is utilized, we recommend an interpreter be provided at this meeting so it is clear that the options are understood by all participants.

Accommodating Deaf or Hard of Hearing Applicants

Be familiar with options for test administration to deaf and hard of hearing applicants. The most appropriate accommodation will depend upon several factors, such as whether the individual uses and is fluent in American Sign Language (ASL), the accuracy and fluency of speech reading skills, and how much hearing loss the individual has experienced. Most — but not all — test applicants who are deaf probably will need to use a qualified interpreter. ASL is a gestural language that has a different vocabulary, syntax, and structure than English.

The first step is to consider the accommodation requested by the individual and offer the individual the following options as appropriate. You should also be willing to consider other accommodations not on this list, if appropriate and accompanied by necessary documentation.

- Use preferential seating near the examiner so that the test applicant is able to read lips unobstructed.
- Use an ASL interpreter for the administrative instructions' portion of the session and Part D, *Following Oral Directions*; with Part D being read by test applicants on their own.
- Use an ASL interpreter for the administrative instructions' portion of the session and the actual Part D test.
- Offer other accommodations as you and the applicant determine to be appropriate.

Exhibit 3-1 (p. 3)

Accommodation Procedures for Testing Applicants With Disabilities

Substituting preferential seating and an opportunity to read the examination instructions and Part D (Battery and Rural Carrier exams) in lieu of an interpreter for a person who uses ASL, most likely will not satisfy our obligation to accommodate an individual who is deaf. For many people who became deaf at birth or before they use language, English is a second language that they do not have the opportunity to hear and use. Therefore, reading rather than having the test instructions translated, may not be appropriate under these circumstances. Similarly, providing an ASL interpreter to an individual who became deaf later in life and never learned sign language would not be an option.

Administering Battery and Rural Carrier Examinations When Using an American Sign Language (ASL) Interpreter for the Deaf

Follow these procedures when testing any applicant that requests an ASL interpreter for the Battery or Rural Carrier Examinations. These procedures are to be reviewed by all individuals, including ASL interpreters, examination administrators, examiners, and examination monitors administering or involved in monitoring an examination in which there are applicants who are using an ASL interpreter.

- Interpreters must possess adequate skills to interpret the examinations. If possible, you should use interpreters who are certified by the Registry for Interpreters for the Deaf, have passed a state quality assurance test, or have a similar certification or qualification.
- The ASL interpreter who is to interpret the examination will be required to review the *Directions for Conducting* (DFC) and any other required material for up to two hours, if necessary, prior to the examination for the purpose of preparing to interpret the examination.
- The Postal Service will compensate the interpreter for the time spent reviewing the examination. Such review will be conducted under the procedures outlined in the DFC covering conditions that ensure security of test materials.
- It is the responsibility of the examiner to coordinate with the ASL interpreter a time, date, and place to review the examination material.
- Applicants who are using an interpreter for Part D must be tested in a separate area or room to minimize any distraction that may be caused by other applicants leaving the examination.

(continued)

Exhibit 3-1 (p. 4)

Accommodation Procedures for Testing Applicants With Disabilities

- For Part D of the examination, the interpreter must wait at each designated pause until every applicant who is using the interpreter indicates that he or she is ready to proceed with the next instruction. The method of determining when the applicants are ready will be decided locally, in consultation with the interpreter. The following suggestions are recommended when an interpreter is used: 1) all applicants are instructed to look up at the interpreter when they are ready for the next instruction; or 2) all applicants are instructed to hold up a green card when they are ready to go ahead with the next instruction.
- Applicants using an ASL interpreter for Part D will not be required to adhere to the same time restrictions imposed on other applicants.

Where to Get Help

- Requests for an examination time-limit change or deviation can only be approved by the manager of Selection, Evaluation, and Recognition.
- You may also wish to utilize additional resources in your communities for more information about accommodating people who are deaf or hard of hearing. These include the local association for people who are deaf, adults with loss of hearing, local community colleges with ASL interpreter programs, associations of speech and hearing sciences, state independent living centers or vocational rehabilitation offices, and other national resources, such as the Job Accommodation Network and Registry of Interpreters for the Deaf.

4 Employment and Placement Procedures

4-1 Policy

It is Postal Service policy to provide employment opportunities to qualified applicants with disabilities (see 1-1). This is accomplished through our competitive and noncompetitive processes. A qualified individual with a disability is one who, with or without reasonable accommodation, can perform the essential functions of the job in question without endangering the health and safety of the individual or others. The Postal Service requires the same performance, attendance, and standards of conduct from employees with disabilities as it does from other employees.

4-2 Recruitment

It is the responsibility of each installation head to actively recruit individuals with targeted disabilities into the work force in order to meet the goals approved by the Equal Employment Opportunity Commission (EEOC). Specific information on these goals and those responsible for action items necessary to meet statutory and legal requirements can be found in the *Affirmative Action Program Plan for Individuals with Disabilities* and the *Disabled Veterans Affirmative Action Plan*, which are updated yearly.

See Exhibit 4-1, Form 3666, *Certification for Postal Service Employment of Individuals With Severe Disabilities*.

Recruitment should include outreach to individuals, organizations, independent living centers, and associations representing individuals with disabilities. Recruitment at universities, colleges, and schools should include outreach to students with disabilities. Recruitment may include, but is not limited to, state Divisions or Departments of Vocational Rehabilitation (DVR), the Department of Veterans Affairs (VA), associations for the deaf, Goodwill Industries, outreach programs for veterans with disabilities, and educational institutions that have a significant number of students who have disabilities.

Advance notice of upcoming examinations should be provided to these organizations so that they can identify qualified individuals with disabilities to participate in the competitive process.

4-3 Competitive Selection and Placement of Individuals With Disabilities

The Postal Service's goal is to mainstream individuals with severe disabilities into entry-level jobs through the use of its competitive selection process, with appropriate use of reasonable accommodation in the examination process.

See Chapter 3, Reasonable Accommodation in the Examination Process

An applicant can be identified as having a disability during the examination process, the interview process, or the preemployment medical assessment. Many applicants with disabilities are qualified to perform the essential functions of jobs without the need for any accommodation.

However, if an applicant with a disability who is otherwise qualified cannot perform one or more essential job functions because of his or her disability, the employer must consider whether modifications or adjustments are available that would enable the person to perform these functions.

Employers must engage in an interactive process (see 2-2) to identify essential functions of the job, the applicant's abilities and limitations, and the reasonableness of accommodations proposed (if any).

- **Example — Competitive Selection:** The score of a compensable veteran with a service-connected disability was reached on a hiring worksheet for the job of city carrier. His preemployment eligibility and suitability reviews were favorable. During his interview, he identified a need for accommodation. His left arm had been amputated below the shoulder but he was very proficient in the use of an artificial arm and hand.

A site visit was arranged where the essential functions and requirements of the job were explained and demonstrated to him. He was encouraged to discuss how he would perform the tasks associated with the job. He then demonstrated that he could perform the essential functions and requirements although with some difficulty. He was extended a bona fide job offer and scheduled for a medical assessment.

The risk assessment showed *moderate risk with restriction* and indicated that an accommodation would be required for his missing left arm and hand. Another meeting was scheduled with him. His prospective supervisor and a counselor from the local VA Rehabilitation Center were invited to assist in the accommodation efforts.

He again demonstrated his ability to perform job functions and recommended a modification to his prosthetic appliance that would enable him to handle and manipulate the mail for sorting with the required speed, accuracy, and proficiency. The VA counselor agreed to assist in development of the recommended retrofit to the prosthetic device.

When the modification to the prosthesis was complete and its safety and effectiveness was demonstrated, he received a career appointment as a city carrier.

4-4 Noncompetitive Selection and Placement of Individuals With Disabilities

4-4.1 Overview

Most employees with disabilities are appointed from a competitive hiring register. However, when the competitive process itself is a barrier to employment for qualified individuals with severe disabilities, and these individuals would be able to perform at or above the normal standards of job performance, noncompetitive authority may be used.

- **Example — Noncompetitive Recruitment:** A review of the Affirmative Action Program Plan for Individuals with Disabilities by the human resources manager revealed that the district was not achieving the goal for the number of career accessions of individuals with targeted disabilities. To date, 398 career appointments had been made district-wide. Many of the applicants hired were individuals with disabilities. However, only one applicant had a targeted disability. The human resources manager scheduled a meeting with the manager of personnel services and the diversity specialist to discuss this recruitment issue.

At the meeting it was decided to use new recruiting strategies that would attract more individuals with disabilities when the 470 Battery examination was opened later that year. To meet the current accession goal, the employment office would initiate contact with the state DVR and request a list of names to fill three vacancies that existed at the processing and distribution center (P&DC). This was done and resulted in three noncompetitive career mail processor appointments.

This newly established rapport with the state DVR office extended to several other offices, as postmasters discovered that the noncompetitive program for individuals with disabilities was a viable recruitment source. Postmasters and managers were able to consider and select qualified applicants while at the same time meeting their affirmative action goals for individuals with disabilities.

To participate in the referral of applicants for noncompetitive hiring consideration, the VA and/or state DVR must have the services and programs they offer certified by the Postal Service. The certification process requires state DVR and VA organizations that wish to participate in this hiring process submit a certification package to the district manager of human resources and forward to the vice president of Employee Resource Management for review and approval. The package must include the following information:

- Description of the services and programs offered.
- The various screening methods used to identify potential postal applicants.

When the state DVR or VA certification package has been approved, vocational rehabilitation agencies can begin to identify and screen potential postal applicants. The services and programs that vocational rehabilitation agencies and units provide to the Postal Service are essentially an alternative means of assessing applicant qualifications. Therefore, it is critical that all referred applicants receive the most appropriate method of assessment and evaluation to determine that they meet Postal Service selection standards and have the ability to satisfactorily perform as employees. Applicants will be considered to have successfully met the Postal Service's selection requirements as a result of this certification process.

4-4.2 **Job Information for Rehabilitation Counselors**

The recruitment of individuals with severe disabilities requires partnership with the VA and state DVR offices. Vocational rehabilitation counselors must make a site visit and tour the postal facility. Seeing postal operations up close will provide counselors with a better understanding of our work environment and job requirements. A demonstration of the functional and physical requirements for each eligible entry level job will assist the counselor to further screen potential applicants and identify those individuals who are likely to be successful in available postal jobs. Counselors should also be provided with the following:

- A standard position description.
- A list of the essential functions of the job (see 2-2.1).
- A job preview video (if available).
- A list of the work behaviors associated with the job (movements such as lifting, walking, standing, etc.).
- A list of the knowledge, skills, and abilities an individual must possess to adequately perform the work.
- Information on probationary timelines and performance requirements.

4-4.3 The Hiring Process

The following steps must be taken when a hiring need exists:

- The postal manager requests the state DVR to certify three names for consideration and one additional name for each additional vacancy. This certification must be consistent with the process outlined by the state DVR or VA in its certification package and include completed Forms 2591, *Application for Employment*, and 3666, *Certification for Postal Service Employment of Individuals with Severe Disabilities*.
- Certified applicants are then given a tour of the postal facility during a prehire orientation. The visit should provide sufficient information to assist the applicants in making an informed decision about whether they are interested in postal employment.
- Interviewers then engage in an interactive process (see 2-2) to identify the essential functions of the job and the abilities and limitations of the applicant. Otherwise, the interview process for an individual with a disability is essentially the same as an interview conducted with an applicant who does not have a disability (see *Interview: Restricted Guide and Self-Instructional Module* issued in 1995).
- The referred applicants are considered and a tentative selection is made in accordance with the eligibility and suitability guidelines outlined in Chapter 3 of Handbook EL-311, *Personnel Operations*. A list of those applicants not selected for the job is then returned to the state DVR or VA, as appropriate.
- After making a bona fide job offer, the selecting official (or designee) schedules the selected applicant for a medical assessment and provides a copy of Form 3666 and any other supporting documentation concerning the applicant's medical history.
- Following the applicant's successful completion of the medical assessment, the selecting official (or designee) schedules a meeting with the applicant, rehabilitation counselor, disability coordinator, and immediate supervisor or designated operations manager to discuss requirements (e.g. checklist, reasonable accommodation issues, and essential job functions) previously outlined in this handbook. Documentation of the results of this meeting must be attached to the reasonable accommodation checklist and retained for 5 years by the employing office.

4-4.4 Probationary Period

If it becomes reasonably clear at any point during the probationary period that an employee with a severe disability hired under the noncompetitive process is having difficulty developing the requisite abilities for the job, the immediate supervisor must request that the appropriate VA or state DVR counselor assist in overcoming problems and deficiencies in performance.

Schedule a meeting at the earliest possible opportunity between the interested parties to attempt to correct the performance deficiency. Many times early dialogue can result in a quick solution to the performance

problem. A simple job modification or a different method of communication may be the only change necessary to enable the employee to perform the essential functions of the job more efficiently.

If the employee is still unable to develop the requisite skills and abilities for the job, with or without reasonable accommodation, separation must be initiated during the probationary period. The postal installation head or designee must notify the VA or state DVR when a decision is made that the person's employment is to be terminated. This will enable the VA or state DVR to make other arrangements for rehabilitation, employment, or other assistance.

4-5 Medical Assessment

Whether selected under a competitive or noncompetitive process, applicants who receive a bona fide job offer are referred for medical assessment. Do not make medical inquiries or schedule a medical assessment prior to making a bona fide job offer.

Bona fide job offers must precede medical assessments whether the applicant was selected under competitive or noncompetitive processes.

4-5.1 Information Furnished for Medical Assessment

The hiring official should provide:

- Copy of Form 3666, *Certification for Postal Service Employment of Individuals with Severe Disabilities*, for an individual selected under the noncompetitive process.
- Any other supporting documentation concerning the individual's medical history.
- Usual paperwork furnished for preemployment medical assessments as described in Handbook EL-311, Chapter 3.

4-5.2 Function of the Medical Assessment

The medical assessment provides the hiring official with information concerning an applicant's ability to physically and/or mentally perform in a specific job. It identifies any physical and/or mental restrictions or limitations of the applicant, and the degree of risk for further illness or injury within the next 6 months. It may suggest job modifications or accommodations which would reduce applicant risk and allow performance of the functions of the job in a safe manner. The medical assessment provides the hiring official with critical information necessary to make an informed hiring decision. It is not a recommendation for or against hiring and placement. This decision rests with the hiring official.

If the medical information developed is not adequate to make a hiring decision, further evaluation by a contract physician, private physician, or specialist(s) may be required to identify potential accommodations (see 2-2.3). Contact local medical personnel for assistance.

4-6 Determining Whether and How to Accommodate Physical Limitations

The hiring official ultimately determines whether the applicant will be appointed, after carefully considering the results of the medical assessment and the applicant's ability to perform the essential functions of the job with or without reasonable accommodation. In order to reach a decision, hiring officials must follow the reasonable accommodation process described in Chapter 2.

Reassignment is not available to applicants.

An applicant for a job must be qualified for and be able to perform the essential functions of the job for which a bona fide job offer was extended, with or without reasonable accommodation.

4-7 Reasonable Accommodation Checklist

4-7.1 **Completing the Reasonable Accommodation Checklist**

The checklist is designed to document the reasonable accommodation decision-making process in all matters of employment and placement when accommodation is an issue. The checklist must be completed by the selecting official or a human resources staff person delegated to perform the hiring function for each person identified as needing an accommodation. Use of the checklist facilitates an objective and consistent approach to evaluation and selection procedures and establishes an accurate and timely written record.

Officials completing the checklist may need to involve other persons in various decisions documented on the checklist, but each person need not sign the checklist.

Written documentation such as memos, notes, and other related information should be attached to the checklist.

Forward the checklist for review and approval to the local district manager of human resources or designee with reviewing responsibility.

4-7.2 Filing the Reasonable Accommodation Checklist

Upon review and approval, the original checklist and accompanying documentation are maintained by the district HR manager or designee with reviewing responsibility. Separate the medical documentation from the checklist and retain this in the official medical file.

Retain the checklist for 5 years or until any appeals are adjudicated, whichever is longer. Upon request, the checklist may be provided for review by personnel with a need to know.

Exhibit 4-1 (p. 1)
Form 3666, Certification for Postal Service Employment of Individuals With Severe Disabilities

United States Postal Service Certification of Postal Service Employment of Individuals with Severe Disabilities (Please print or type)	
Position Title <input type="checkbox"/> City Carrier <input type="checkbox"/> Data Conversion Operator <input type="checkbox"/> Distribution Clerk <input type="checkbox"/> Mail Handler <input type="checkbox"/> Mail Processor <input type="checkbox"/> Markup Clerk, Automated	
Applicant	
Name	Address (No., st., apt., city, state, ZIP + 4)
SSN	DOB
TO:	
Postal Service Personnel Office Name	Address (No., st., apt., city, state, ZIP + 4)
FROM:	
VA or Rehabilitation Office Name	Address (No., st., apt., city, state, ZIP + 4)
Counselor's Printed Name	Phone No. (Include area code)
<p>The above-named applicant for the cited position in _____ _____ (city and state) has a severe disability, _____ . I have reviewed both the job requirements and the job site _____ (code)</p> <p>and certify that the applicant:</p> <ul style="list-style-type: none"> a. has the ability to perform the duties of the position; b. is qualified to do the work without hazard to self or others; c. is physically and socially competent to maintain him or herself in a work environment, either independently, or with the same level of assistance he or she uses during non-working hours; d. is unable to successfully compete in the Postal Service competitive process because of the nature or severity of the disability; and e. can reasonably be expected to meet or exceed the normal standards of job performance of the position within the 90-day probationary period. 	
Counselor's Signature	Date
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Exhibit 4-1 (p. 2)
Form 3666, Certification for Postal Service Employment of Individuals With Severe Disabilities
(Reverse)

Disability Codes	
<i>Targeted</i>	<i>Non-Targeted</i>
Hearing Impairments	
16 Total deafness with understandable speech	
17 Total deafness with inability to speak clearly	
Vision Impairments	
23 Cannot read ordinary size print — not correctable by glasses	
25 Blind in both eyes	
Missing Extremities	
28 One arm	
32 One leg	
33 Both hands or arms	
34 Both feet or legs	
35 One hand or arm and one foot or leg	
36 One hand or arm and both feet or legs	
37 Both hands or arms and one foot or leg	
38 Both hands or arms and both feet or legs	
Partial Paralysis	
64 Both hands	
65 Both legs (any part)	
66 Both arms (any part)	
67 One side of body (including one arm and one leg)	
68 Three or more major parts of the body (arms and legs)	
Complete Paralysis	
71 Both hands	
72 One arm	
73 Both arms	
74 One leg	
75 Both legs	
76 Lower half of body	
77 One side of body (including one arm and one leg)	
78 Three or more major parts of body (arms and legs)	
Other Impairments	
82 Convulsive disorders (e.g., epilepsy)	
90 Mental retardation	
91 Mental or emotional illness	
92 Severe distortion of limbs and/or spine	
Speech Impairment	
	13 Speech malfunction, hearing normal
Hearing Impairment	
	15 Hard of hearing
Vision Impairment	
	22 Can read ordinary size print with glasses but with loss of peripheral vision
	24 Blind in one eye
Missing Extremities	
	27 One hand
	29 One foot
Non-Paralytic Orthopedic Impairments	
	44 One or both hands
	45 One or both feet
	46 One or both arms
	47 One or both legs
	48 Hip or pelvis
	49 Back
	57 Any combination of two or more parts of the body
Partial Paralysis	
	61 One hand
	62 One arm (any part)
	63 One leg (any part)
Complete Paralysis	
	70 One hand
Other Impairments	
	80 Heart disease (with no restriction or limitation of activity)
	81 Heart disease (with limitation of activity)
	83 Blood disease
	84 Diabetes
	86 Pulmonary disorders
	87 Kidney dysfunction
	88 Cancer (history with complete recovery)
	89 Cancer (undergoing surgical and/or medical treatment)
	93 Disfigurement of face, hands, or feet
	94 Learning disability

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5 Reasonable Accommodation After Appointment

5-1 Orientation and Training

Postal Service officials should seek the advice and assistance of outside sources, such as the VA, state DVR, or Job Accommodation Network concerning the orientation and training of employees with disabilities. These agencies should be encouraged to assist and work with management to overcome problems encountered by the new employees. Follow the usual orientation and training procedures and provide reasonable accommodation, as appropriate.

5-2 Bids, Promotions, and Reassignments

Once individuals with disabilities enter the regular work force, they have all bid and promotion rights afforded any employee under the applicable collective bargaining agreement. Employees with disabilities are as interested in promotions and preferred bid assignments as anyone else, so the exercise of these rights is natural and should be anticipated. The reasonable accommodation decision process is initiated each time an employee with a disability is being considered for a different job (either through bid, application, or other procedures). Engage in the same case-by-case interactive process (see 2-2) to identify the essential functions of the job in question, to determine the employee's abilities and limitations, and to identify and evaluate potential accommodations. The Reasonable Accommodation Checklist will be helpful in these reassignment situations. See Reasonable Accommodation Checklist 3.

- **Example — Bidding Process:** An employee has held the job of distribution clerk since she entered the Postal Service under the noncompetitive selection procedures. This employee is totally deaf, but is very proficient in lip reading. A window clerk job was posted, and this employee was senior bidder.

The interactive process was initiated, and essential functions of the job were identified. An outside interpreter funded by the Postal Service was brought in to assist in this process. It was determined that the employee could

perform the essential functions of the job. Specifically, the employee could communicate effectively with the public.

Suggested accommodation was possible because the work schedule was during a period where there would be several other window clerks on duty to answer telephone calls and provide assistance should occasional communication problems exist.

- **Example — Reassignment Process:** A deaf or hard of hearing individual assigned to a mail processor job may require certain safety equipment, such as warning lights, to supplement auditory alarms. If the employee is later reassigned or promoted to a job requiring more personal contact, different accommodations may be necessary, such as finger spelling. In this example, the individual's limitations remain the same throughout the process; it is the job and the requirements imposed upon his or her performance that change.

5-3 Employee Request for Reasonable Accommodation in Current Job

In order to request reasonable accommodation, an employee need not use the phrase *reasonable accommodation*. The employee needs only to let you know that he or she needs a change at work for his or her disability. A family member, friend, or other representative may request reasonable accommodation on behalf of an employee with a disability.

When an employee requests accommodation, you may ask for documentation so that you can make a determination about whether the employee is eligible for protection under the Rehabilitation Act (see 1.4).

5-4 Office of Workers' Compensation Program

In recent years, many postal managers have been involved in a special rehabilitation program in connection with the Department of Labor's Office of Workers' Compensation Program (OWCP). This program is designed to return to productive employment former postal employees who, due to on-the-job injuries, have been unable to perform their regular jobs and have been on OWCP rolls. The requirements and standards of the USPS/OWCP rehabilitation program are different from those that apply in connection with reasonable accommodation of individuals with disabilities; therefore, this policy does not cover the USPS/OWCP rehabilitation program.

5-5 Light Duty

Light duty is determined solely under the applicable collective bargaining agreement for individuals who, because of non-work-related injury or illness, are returning to work with physical limitations. As specified in those agreements, employees with more than 5 years of service may be entitled to consideration for permanent light duty under the applicable collective bargaining agreement. However, the reasonable accommodation policy described in this handbook does not apply to temporarily injured persons.

5-6 Disability Retirement

Employees who meet eligibility requirements may apply through their personnel office for Office of Personnel Management disability retirement. The application for disability retirement includes an *Agency Certification of Reassignment and Accommodation Efforts*. Disability-retirement standard operating procedures may be viewed by accessing the Personnel Desktop under the human resources web page on the Postal Service Intranet.

5-7 Reasonable Accommodation for the Deaf and Hard of Hearing

Management has an obligation to reasonably accommodate deaf and hard of hearing employees and applicants who request assistance in communicating with or understanding others in work-related situations, such as the following:

- During investigatory interviews that may lead to discipline, discussions with a supervisor on job performance or conduct, or presentation of a grievance.
- During some aspects of training, including formal classroom instruction.
- During portions of EAP programs and EEO counseling.
- In critical elements of the selection process, such as during testing and interviews.
- During employee orientations and safety talks, CFC, and saving bond drive kickoff meetings.
- During the filing or meetings concerning an employee's OWCP claim.

A reasonable accommodation must be approached on a case-by-case basis. The individual's input must be considered prior to making a decision regarding accommodation.

This obligation is met by selecting an appropriate resource from the variety of resources available. In selecting a resource, the following, among others, should be considered, as appropriate:

- The ability of the deaf or hard of hearing employee to understand various methods of communication and the ability of others to understand the deaf or hard of hearing employee.
- The importance of the situation as it relates to work requirements, job rights, and benefits.
- The availability and cost of the alternative resources under consideration.
- Whether the situation requires confidentiality.

Available resources such as the following should be included:

- Installation heads are authorized to pay for certified interpreters. Every effort will be made to provide certified interpreters when deemed necessary by an application of the principles set forth herein.
- In some states, the DVR provides interpreters at no charge. When a decision is made that an interpreter is the appropriate accommodation and a state DVR interpreter is not available, other methods of securing an interpreter should be used.
- Volunteer interpreters or individuals skilled in signing may be obtained from the work force or from the community. The skill level of such persons should be considered.
- In some situations, written communications may be appropriate. The deaf or hard of hearing employee's ability to understand written communications should be considered.
- Supervisors, training specialists, EAP, and EEO counselors may be trained in sign language.
- Deaf or hard of hearing applicants should be normally scheduled for a specific examination time when an interpreter will be available.
- State or federal relay services may provide a way for a deaf or hard of hearing employee to conduct postal business by telephone with other employees and customers.

Management will provide the following assistance for deaf and/or hard of hearing employees:

- Films or videotapes designed for the training or instruction of regular work force employees developed on or after October 1, 1987 are to be opened or closed captioned. To the extent practicable, existing films or videotapes developed nationally that will continue to be used by deaf or heard of hearing employees with some frequency are to be opened or closed captioned.

- Special telecommunications devices for the deaf are to be installed in all postal installations employing deaf employees in the regular work force. Special telecommunications devices or telephone volume control devices are to be installed for hard of hearing employees whenever a hard of hearing employee needs a reasonable accommodation in order to communicate by phone. These devices are to be available to deaf or hard of hearing employees for official business and in the case of personal emergencies. Management is to provide training to staff on the use of these special telecommunications devices.
- Visual alarms are to be installed on moving powered industrial equipment in postal installations employing deaf employees in the regular work force or in installations where such a reasonable accommodation is necessary for a hard of hearing employee.
- Visual fire alarms are to be installed in all new postal installations where the Postal Service installs audible fire alarms (installations for which the Postal Service, as of June 12, 1991, had not yet awarded a contract for the design of the building).

Glossary

accessibility	The capability of being used. Handbook RE-4, <i>Standards for Facility Accessibility by the Physically Handicapped</i> , presently provides that, "Where handicapped persons are employed in existing postal facilities, or where their employment is imminent, applicable employee work areas must be altered in compliance with (accessibility) standards..."
Americans With Disabilities Act (ADA)	The Americans with Disabilities Act is civil rights legislation which prohibits discrimination based upon a person's disabilities. It covers the private sector and state and local governments. The ADA requires such entities to accommodate individuals with disabilities in all phases of government services, public accommodations, transportation, and employment.
bona fide job offer	An offer made to an applicant selected either competitively or noncompetitively after having met the overall eligibility and personal suitability requirements.
Code of Federal Regulations (CFR)	A codification of the rules published in the Federal Register by executive departments and agencies of the federal government. Postal regulations are found in 39 CFR.
collective bargaining agreements	Also referred to as National Agreements or Contracts, these are the Postal Servicewide binding terms and conditions agreed upon by the Postal Service and the labor unions.
competitive employment process	The consideration and selection of individuals from a hiring register established as the result of rankings achieved on a competitive entrance examination.
direct threat	A significant risk of substantial harm to the safety or health of the person or others that cannot be eliminated by reasonable accommodation.
disability	A physical or mental impairment that substantially limits one or more major life activities of an individual.
disability retirement	An application for annuity filed by an employee claiming permanent, total disability for his or her job.
Division or Department of Vocational Rehabilitation (DVR)	State offices providing rehabilitation assistance for individuals with disabilities.
Equal Employment Opportunity Commission (EEOC)	A federal commission that works to provide equal opportunities for all personnel in employment, training, assignment, promotion, and job security without discrimination owing to race, color, religion, sex, national origin, age, or physical or mental disability.

essential functions	The major tasks that must be accomplished on a specific job. They are tasks that, if performed incorrectly or omitted by the individual, will result in failure to attain the basic purpose of the job. Other factors to consider are the amount of time a satisfactory individual normally spends performing the function, whether the function is uniformly performed by incumbents, the past experience of job holders, the degree of skills and abilities needed to perform the function (see 2-2.1). Essential functions may vary from one installation to another for specific jobs with the same job title and occupation code.
Family and Medical Leave Act (FMLA)	The federal law that requires covered employer to provide up to 12 weeks of unpaid, job-protected leave to <i>eligible</i> employees for certain family and medical reasons. Employees are generally eligible if they have worked for at least 1 year and for 1,250 hours over the previous 12 months.
Federal Employee's Compensation Act (FECA)	The Federal Employees' Compensation Act is a law which provides compensation benefits to civilian employees of the United States for disability due to personal injury (including occupational disease) sustained while in the performance of duty. Damage to or destruction of medical braces, artificial limbs, and other prosthetic devices incidental to a personal injury is also compensable. The FECA also provides for the payment of benefits to dependents if job-related injury or disease causes the employee's death.
impairments	See <i>physical or mental impairments</i> .
job restructuring	Altering a job in a fashion that enables a qualified person with a disability to perform the essential functions.
light duty	Work, as defined in a specific collective bargaining agreement, provided to an employee who is unable to perform the full duties of his or her job due to a non-work-related injury or illness.
major life activities	Functions such as, but not limited to (see 1-4.1.2) caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.
medical assessment	Preemployment medical examination, medical assessment questionnaire process, or additional information to identify an individual's ability to perform the functions of the job in question without endangering the health and safety of the individual or others.
noncompetitive employment process	The Postal Service's structured procedure for hiring and placement of qualified persons outside the competitive process (see <i>competitive employment process</i>) e.g., persons with severe disabilities evaluated, certified, and referred by state DVR or VA for employment consideration.
physical or mental impairments	(1) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, cardiovascular, reproductive, digestive, genito-urinary, hemic, and lymphatic, skin, and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Glossary

qualified individuals with a disability	With respect to employment, an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the job in question without endangering the health and safety of the individual or others. A qualified individual with a disability is required to perform at a level comparable to that of other employees.
reasonable accommodation	An adjustment or modification to the facility, environment, equipment, testing situation, or policy, or to the nonessential functions of the particular job, which will allow the qualified individual with a disability to perform the essential functions of that job.
Rehabilitation Act of 1973	The Rehabilitation Act prohibits discrimination against qualified employees and job applicants with disabilities in the federal government. The act also requires that federal employers provide reasonable accommodation to such individuals in order to allow them to perform the essential functions of their job. Accommodations are not required when they impose an undue hardship on the employer or endanger the health and safety of the individual or others.
restrictions	See <i>work restrictions</i> .
restructuring	See <i>job restructuring</i> .
risk assessment	The identification of physical or mental restrictions or limitations of the individual, and the degree of risk for further illness or injury within the next 6 months. It may suggest job modifications or accommodations that would reduce individual risk and allow performance of the essential functions of the job in a safe manner.
substantially limits	An impairment rendering the individual either unable to perform a major life activity or significantly restricted in performing the activity as compared to the average person's ability to perform the activity.
targeted disabilities	Disabilities targeted by the Equal Employment Opportunity Commission (EEOC) for emphasis in affirmative action program planning. The disabilities and the codes that represent them are as follows: 16 and 17 (deafness), 23 and 25 (blindness), 28 and 32 through 38 (missing extremities), 64 through 68 (partial paralysis), 71 through 78 (complete paralysis), 82 (convulsive disorders), 90 (mental retardation), 91 (mental illness), and 92 (distortion of limbs and/or spine).
undue hardship	The Postal Service is required to make reasonable accommodation to known physical and mental limitations of a qualified individual with a disability unless the accommodation would impose an undue hardship on the operation to which individuals with disabilities are assigned. Factors to be considered in determining undue hardship are: (1) the overall size of the operation with respect to the number of employees, number and type of facilities, and size of budget; (2) the type of operation, including composition and structure of the work force; and (3) the nature and cost of the accommodation.
Department of Veterans Affairs (VA)	An agency of the federal government, formerly called the Veterans Administration, serving the needs of former members of the United States armed forces.
work restrictions	Specific functions that a person with a disability should not perform (e.g., no heavy lifting over 50 pounds).

Accommodation Checklists

Reasonable Accommodation Checklist 1

Competitive Selection of Applicant With a Disability

Applicant's Name _____ Proposed Job _____

SSN _____ Installation _____

Point where need for accommodation identified:

Prehire Interview Preemployment Medical Assessment

Other _____

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Eligibility/Suitability			
1. Does the applicant meet eligibility requirements? See Handbook EL-311.			
2. If not, was the applicant notified?			
3. Does the applicant meet suitability requirements? See Handbook EL-311.			
4. If not, was the applicant notified?			
Bona Fide Job Offer and Preemployment Medical Assessment			
1. Was the applicant tentatively selected and given a bona fide job offer?			
2. Was the examining physician provided with specific information as outlined in Handbook EL-307, 4-5?			
3. Is additional evaluation by Postal Service physicians or specialists required?			
4. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			

Competitive Selection of Applicant With a Disability

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Four Step Interactive Process			
Step One: Determine the Essential Functions of the Job			
1. Have essential functions been identified?			
2. Was the applicant shown the work site and/or were the essential functions and other duties explained to him or her?			
3. After viewing the work site, does the applicant wish to be considered for the job?			
Step Two: Identify the Abilities and Limitations of the Applicant			
1. Have you obtained as much information as necessary about the disability from the applicant or medical personnel?			
2. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			
Step Three: Identify Potential Accommodations			
1. Did you seek the applicant's suggestions for possible accommodation?			
2. Was the accommodation implemented?			
3. If not, why not?			
4. Did you seek the supervisor's suggestions for possible accommodation?			
5. Did you propose alternative accommodation?			
Step Four: Determine the Reasonableness of the Accommodations and Select Options			
1. Was the proposed accommodation properly evaluated? A <i>no</i> response is required for items (a) through (d) if the accommodation is to be implemented (see Handbook EL-307, 2-2.4).			
a. Will the proposed accommodation eliminate or alter the essential functions?			
b. Will the proposed accommodation impose an undue hardship on the Postal Service?			
c. Does the proposed accommodation violate terms of the collective bargaining agreement?			
d. Will the proposed accommodation fail to eliminate or reduce the direct threat of harm?			
2. Can applicant perform the job's essential functions with reasonable accommodation?			

Competitive Selection of Applicant With a Disability

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Final Hire Decision			
1. The data was reviewed and the applicant was appointed on _____.			
2. The accommodation was implemented and the appropriate supervisor was advised of any limitation and/or accommodation.			
3. The data was reviewed and the applicant was not appointed.			
4. If disqualified for medical or nonmedical reasons, was the applicant advised in writing that he or she may request reconsideration? See Handbook EL-311.			
5. Have you reserved jobs for cases involving veterans with 30 percent (CPS) compensable disabilities until final adjudication?			

Type of Accommodation Required _____

Items on the Reasonable Accommodation Checklist were reviewed and verification was made (appropriate documentation is attached). The decision concerning the applicant is appropriate.

Signature of Installation Appointing Official Installation Title Date

Signature of HR Manager or Designee Installation Title Date

Noncompetitive Selection of Applicant With a Severe Disability

Reasonable Accommodation Checklist 2

Noncompetitive Selection of Applicant With a Severe Disability

Applicant's Name _____ Proposed Job _____

SSN _____ Installation _____

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Eligibility/Suitability			
1. Is the applicant properly certified by the VA or state DVR on Form 3666 as having a severe disability?			
2. Does applicant meet the eligibility requirements? See Handbook EL-311.			
3. If not, was the VA or state DVR notified?			
4. Does applicant meet the suitability requirements? See Handbook EL-311.			
5. If not, was the VA or state DVR notified?			
Bona Fide Job Offer and Preemployment Medical Assessment			
1. Was the applicant tentatively selected and given a bona fide job offer?			
2. Was the examining physician provided with specific information as outlined in Handbook EL-307, 4-5, including Form 3666?			
3. Is additional evaluation by Postal Service physicians or specialists required?			
4. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			
Four Step Interactive Process			
Step One: Determine the Essential Functions of the Job			
1. Have essential functions been identified?			
2. Was the applicant shown the work site and/or were the essential functions and other duties explained to him or her?			
3. After viewing the work site, does the applicant wish to be considered for the job?			
Step Two: Identify the Abilities and Limitations of the Applicant			
1. Have you obtained as much information as necessary about the disability from the applicant or medical personnel?			
2. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			

Noncompetitive Selection of Applicant With a Severe Disability

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Step Three: Identify Potential Accommodations			
1. Did you seek the applicant's suggestions for possible accommodation?			
2. Was the accommodation implemented?			
3. If not, why not?			
4. Did you seek the supervisor's suggestions for possible accommodation?			
5. Was the input of the VA or state DVR sought for possible accommodation?			
Step Four: Determine the Reasonableness of the Accommodations and Select Options			
1. Was the proposed accommodation properly evaluated? A <i>no</i> response is required for items (a) through (d) if the accommodation is to be implemented. See Handbook EL-307, 2-2.4.			
a. Will the proposed accommodation eliminate or alter the essential functions?			
b. Will the proposed accommodation impose an undue hardship on the Postal Service?			
c. Does the proposed accommodation violate terms of the collective bargaining agreement?			
d. Will proposed accommodation fail to eliminate or reduce the direct threat of harm?			
2. Can the applicant perform the job's essential functions with reasonable accommodation?			
Final Hire Decision			
1. The data was reviewed and the applicant was appointed on:_____.			
2. The accommodation was implemented and the appropriate supervisor was advised of any limitation and/or accommodation.			
3. The data was reviewed and the applicant was not appointed.			
4. If disqualified for medical or nonmedical reasons, was the applicant advised in writing that he or she may request reconsideration? See Handbook EL-311.			
5. If the applicant was disqualified, was the referring agency (the VA or state DVR) advised?			
6. Have you reserved jobs for cases involving veterans with 30 percent (CPS) compensable disabilities until final adjudication?			

Noncompetitive Selection of Applicant With a Severe Disability

Type of Accommodation Required _____

Items on the Reasonable Accommodation Checklist were reviewed and verification was made (appropriate documentation is attached). The decision concerning the applicant is appropriate.

Signature of Installation Appointing Official	Installation	Title	Date
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Signature of HR Manager or Designee	Installation	Title	Date
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Reassignment of Employee With a Disability

Reasonable Accommodation Checklist 3

Reassignment of Employee With a Disability

Employee's Name _____ SSN _____

Present Job _____ Installation _____

Proposed Job _____ Installation _____

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Eligibility/Suitability			
1. Does the employee meet eligibility requirements, including completion of appropriate written examinations and performance tests if required? See Handbook EL-311.			
2. If not, was the employee notified?			
3. Does employee meet the eligibility requirements of the collective bargaining agreement?			
Four Step Interactive Process			
Step One: Determine the Essential Functions of the Job			
1. Have essential functions been identified?			
2. Was the employee shown the worksite and/or were the essential functions and other duties explained to him or her?			
3. After viewing the worksite, does employee wish to be considered for the job?			
Step Two: Identify the Abilities and Limitations of the Applicant			
1. Have you obtained as much information as necessary about the disability from the employee or medical personnel?			
2. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			
Step Three: Identify Potential Accommodations			
1. Did you seek the employee's suggestions for possible accommodation?			
2. Was the accommodation implemented?			
3. If not, why not?			
4. Did you seek the supervisor's suggestions for possible accommodation?			
5. Did you propose alternative accommodation?			

	Yes/No Or N/A	Verified by: (Name & Date)	Documentation Attached (b)
Step Four: Determine the Reasonableness of the Accommodations and Select Options			
1. Was the proposed accommodation properly evaluated? A <i>no</i> response is required for items (a) through (d) if the accommodation is to be implemented. See Handbook EL-307, 2-2.4.			
a. Will proposed accommodation eliminate or alter the essential functions?			
b. Will the proposed accommodation impose an undue hardship on the Postal Service?			
c. Does the proposed accommodation violate the terms of the collective bargaining agreement?			
d. Will the proposed accommodation fail to eliminate or reduce the direct threat of harm?			
2. Can the employee perform the job's essential functions with reasonable accommodation?			
Medical Assessment			
1. Is medical assessment required?			
2. Was the examining physician provided with specific medical information as outlined in Handbook EL-307, 4-5?			
3. Were the physical and/or mental limitations, if any, evaluated against the job requirements?			
Final Reassignment Decision			
1. The data was reviewed and the employee was reassigned on: _____.			
2. The accommodation was implemented and the appropriate supervisor was advised of any limitation and/or accommodation.			
3. The data was reviewed and the employee was not reassigned.			
4. The employee was advised on: _____.			

Reassignment of Employee With a Disability

Type of Accommodation Required _____

Items on the Reasonable Accommodation Checklist were reviewed and verification was made (appropriate documentation is attached). The decision concerning the applicant is appropriate.

_____	_____	_____	_____
Signature of HR Manager or Designee	Installation	Title	Date



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