



Policy Memorandum 2021-05

Reasonable Accommodations – Effective March 8, 2021

INTENDED AUDIENCE: All AAWDC staff

SUBJECT: Providing reasonable accommodations to participants with disabilities

LAST REVIEWED/UPDATED: N/A

RESPONSIBLE OFFICE: Office of Compliance

POLICY CONTACT: Center Operations Manager

CANCELLATIONS

N/A

Approvals

President and CEO, AAWDC *Kirkland J. Murray*
Kirkland J. Murray (Mar 9, 2021 06:41 EST)

Introduction

Individuals with disabilities are a vital element of the mission and vision of both Anne Arundel Workforce Development Corporation (AAWDC) and the Anne Arundel County Local Workforce System. To be successful, individuals with disabilities may require accommodations for the following:

- Consideration of aid, benefits, services, training, or employment as desired;
- Performing the essential functions of their jobs, or to receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities; and/or
- Enjoy the benefits and privileges of the aid, benefits, services, training, or employment equal to those that are enjoyed by other similarly situated individuals without disabilities unless providing such accommodation would impose an undue hardship.

This policy applies to customers and clients of AAWDC initiatives and visitors to AAWDC-operated facilities. For reasonable accommodation for AAWDC employees, please see the HR Handbook.

Policy Statement

AAWDC is committed to assuring equal opportunity and equal access to employment, services, program, and activities for individuals with disabilities. AAWDC will provide reasonable accommodation(s) to a qualified person with a disability to enable the individual to participate substantially in the same way as an individual without a disability.

(NOTE: an individual need not be permanently disabled to qualify for reasonable accommodation.)

Should an accommodation impose an undue hardship on AAWDC, staff working with the individual must make any other accommodation that does not impose such a hardship. The goal is to ensure that the individual receives the aid, benefit, service, training, or employment provided, to the maximum extent possible, even if such accommodation does not allow participation in the same way.

Guidance on Providing Accommodations

The reasonableness of an accommodation will depend upon the circumstances of each case. Some requests are simple, such as providing alternate formats for individuals with visual impairments or a sign language interpreter. Other requests may require some thought by staff. For example, while AAWDC would not be expected to provide a motorized scooter to a mobility-impaired individual, a reasonable accommodation might be providing an area to stow this aid.

AAWDC is not required to provide personal items to individuals with disabilities, such as hearing aids, prosthetics, wheelchairs, eyeglasses, and the like. However, these items could be considered reasonable accommodations if they meet the specific needs of the program or activity in which the participant is enrolled. Some grants may also have funds specifically designated for such items (i.e., supportive service funds). Nothing in this policy should be read as preventing an initiative from providing such items if they are deemed necessary for full participation in a program or activity with which the individual is actively participating.

Accommodations are considered “unreasonable” only if the proposed accommodations impose an undue hardship for AAWDC. The factors that will be used in determining whether an accommodation is reasonable are as follows:

- The nature and net cost of the accommodation;
- The overall financial resources of the initiative, including the number of persons aided, benefitted, served, or training by the initiative, and the effect of the accommodation on resources and expenses;
- The type of operation, including the geographic separateness and relationship to AAWDC;
- The impact of the accommodation upon the operations of AAWDC, including the impact on the ability of other participants to receive aid, benefits, services, or training and the impact on AAWDC’s ability to carry out its mission.






Reasonable Accommodations - Draft for Signature

Final Audit Report

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