



### ADA and Reasonable Accommodation Practices

#### Effective Date

1/5/2026

#### Purpose

The purpose of this policy is to ensure that the Northeast Iowa Workforce Development Board (NEIWDB) provides equal employment opportunities to qualified individuals with disabilities and complies with the Americans with Disabilities Act (ADA), the ADA Amendments Act (ADAAA), Section 504 of the Rehabilitation Act, and all applicable state and federal anti-discrimination laws. This policy outlines NEIWDB's process for evaluating and responding to employee accommodation requests, in coordination with the Employer of Record (EOR).

#### Policy

NEIWDB is committed to providing a workplace free from discrimination on the basis of disability.

Qualified applicants and employees with disabilities are entitled to:

- Equal opportunity in hiring, advancement, and all workplace activities
- Reasonable accommodations that enable performance of essential job functions
- An individualized, interactive process to determine appropriate accommodations
- Confidential handling of medical or disability-related information

NEIWDB prohibits discrimination, harassment, or retaliation against any individual for requesting an accommodation or participating in the accommodation process.

#### ***Definition: Qualified Individual with a Disability***

A qualified individual with a disability is someone who meets the skill, experience, education and other job-related requirements of a position and who can perform the essential functions of the job, with or without reasonable accommodation.

#### **Roles & Responsibilities**

##### **1. NEIWDB Responsibilities**

NEIWDB is responsible for:

- Receiving and reviewing accommodation requests
- Conducting the interactive dialogue with the employee
- Determining whether an accommodation is reasonable



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- Identifying essential job functions
- Implementing approved accommodations
- Approved accommodations will be implemented promptly and without unnecessary delay
- Coordinating with the EOR for documentation, medical verification, or HR processes

### **2. Employer of Record (EOR) Responsibilities**

The EOR assists by:

- Maintaining confidentiality of medical information
- Processing necessary HR forms or documentation
- Advising NEIWDB on ADA compliance requirements
- Supporting accommodation implementation when required

The EOR does not make decisions about job duties or essential functions; this authority rests solely with NEIWDB.

### **Requesting Reasonable Accommodation**

#### **How to Request**

An employee may request accommodation verbally or in writing to:

- Their immediate supervisor
- The Executive Director
- The EOR HR representative
- The Board Chair (if the request involves the Executive Director)

No special form or wording is required.

A request may be as simple as saying:

“I need an adjustment or change at work because of a medical condition.”

#### **Medical Documentation**

NEIWDB, in consultation with the EOR, may request medical documentation to:

- Confirm the existence of a qualifying disability
- Understand functional limitations
- Evaluate possible accommodations

Any medical documentation requested will be limited to information necessary to verify a disability and understand functional limitations.

All medical information is confidential and kept only by the EOR.



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### **The Interactive Process**

Upon receiving a request, NEIWDB will promptly begin the interactive process, which includes:

1. Discussing the employee's job duties and limitations
2. Identifying essential functions of the position
3. Exploring possible reasonable accommodations
4. Determining feasibility based on operational needs
5. Coordinating with the EOR for documentation

Accommodations are evaluated case by case.

### **Examples of Reasonable Accommodations**

(Examples only — not an exhaustive list)

- Modified work schedules
- Reassignment of non-essential job tasks
- Assistive technology or adaptive equipment
- Adjustments to communication methods
- Remote or alternate work arrangements (when feasible and consistent with job duties)
- Additional breaks for medical needs
- Modified workspace
- Leave of absence as a reasonable accommodation

Accommodations that pose an undue hardship, remove essential job functions, or compromise program integrity may be denied.

### **Limitations & Undue Hardship**

NEIWDB is not required to provide accommodations that:

- Create undue financial or administrative burden
- Fundamentally alter the nature of NEIWDB services or operations
- Remove essential job duties
- Endanger safety or violate confidentiality/security standards
- Conflict with federal workforce program requirements

NEIWDB will document the basis for any denial and offer alternative solutions when possible.

### **Confidentiality**

All disability-related information, documentation, and medical records:

- Are confidential under federal and state law



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- Are kept separately from personnel records
- Are maintained by the EOR
- Are shared only with individuals who have a legitimate business need to know

### **Retaliation Prohibited**

NEIWDB strictly prohibits retaliation against any individual who:

- Requests a reasonable accommodation
- Participates in the interactive process
- Reports concerns related to ADA compliance
- Supports another employee in requesting accommodation

Any employee who believes they have been subjected to retaliation should report the concern to their supervisor, Executive Director, EOR HR, or the Board Chair.

### **Complaints or Appeals**

Employees may appeal an accommodation decision by contacting:

- The Executive Director
- The Board Chair (if the complaint involves the Executive Director)
- The EOR Human Resources office

ADA-related complaints will be handled independently from WIOA Equal Opportunity discrimination complaints unless the nature of the complaint involves alleged discrimination.

### **Procedures – Policy Review**

This policy will be reviewed annually and updated as needed to ensure compliance with ADA, WIOA requirements, and the NEIWDB–EOR agreement.