

 <b>BROWN</b>	<b>Employment Accommodations for Persons with Disabilities SOP</b>	SOP 08.15.05
		Effective Date: February 12, 2021

## 1.0 Standard Operating Procedure (SOP) Purpose

The purpose of this SOP outlines procedures to process a request for a Reasonable Accommodation for Persons with Disabilities.

## 2.0 SOP

The Reasonable Accommodation Process is an Interactive Process between the employee, University Human Resources (UHR), Brown’s third-party Accommodation Administrator, the employee’s manager, and other subject matter experts.

### 2.1 Applicants

Applicant requests for a Reasonable Accommodation during the hiring process may be submitted to University Human Resources at [employment@brown.edu](mailto:employment@brown.edu).

### 2.2 Employees

Employees who wish to request a Reasonable Accommodation should contact Brown’s third-party Accommodation Administrator, Broadspire, directly at 1-888-599-8576.

- Broadspire will request basic information about the accommodation request. Employees will be assigned a request number, and the accommodation request will be sent to Broadspire’s Accommodation Specialist for review and follow up.
- Broadspire will notify University Human Resources that an accommodation has been requested and will require a copy of the employee’s job description from UHR. UHR will forward the job description directly to Broadspire.
- Broadspire’s Accommodation Specialist will be in direct contact with the employee. Broadspire will request that the employee’s medical provider complete the required medical documentation. The employee will directly mail the completed medical documentation to Broadspire.
- Upon receipt of the required medical documentation, Broadspire will assess the request and determine whether an employee is eligible for a Reasonable Accommodation under applicable federal and state laws and regulations.
- Broadspire will work with the employee, University Human Resources, the employee’s manager, and other subject matter experts to engage in the Interactive Process.

## 3.0 Definitions

For the purpose of this SOP, the terms below have the following definitions:

**Disability:** A physical or mental impairment that substantially limits one or more major life activities of an individual. A Disability may also include an individual having a record of such an impairment or being regarded as having such an impairment.

**Essential Job Functions:** Essential Job Functions are the primary duties that an employee must perform with or without a Reasonable Accommodation. A position's Essential Job Functions are determined through a review of several factors including, but not limited to, the job description, the amount of time spent performing the function(s), and the supervisor's determination of what duties are essential.

**Interactive process:** A collaborative process of communication among the employee, the employee's manager, University Human Resources, and other subject matter experts to determine a Reasonable Accommodation for an eligible employee.

**Persons with Disabilities:** Individuals with a Disability who satisfy the prerequisites of a position and can perform the job's Essential Functions with or without a Reasonable Accommodation.

**Reasonable Accommodation:** A Reasonable Accommodation is any change or modification in the work environment that enables Persons with Disabilities to receive equal opportunities. A Reasonable Accommodation may be provided when doing so does not pose an Undue Hardship to the University or reduce work quality or standards.

**Undue Hardship:** Actions deemed unduly extensive, substantial, or disruptive, or will fundamentally alter a business' nature or operations. In determining whether a requested accommodation creates an Undue Hardship, the appropriate University administrator will consider each request on a case-by-case basis.

#### 4.0 Responsibilities

All individuals to whom this SOP applies are responsible for becoming familiar with and following this SOP. University supervisors are responsible for promoting the understanding of this SOP and for taking appropriate steps to help ensure compliance with it.

**Applicants requesting Reasonable Accommodation:** Applicants seeking an accommodation must email [employment@brown.edu](mailto:employment@brown.edu).

**Employees requesting Reasonable Accommodation:** Employees seeking an accommodation must contact Brown's third-party Accommodation Administrator, Broadspire, to initiate a Reasonable Accommodation request at 888-599-8576. The applicant or employee must submit completed medical documentation directly to Broadspire. Additional documentation may be required from the health care provider of an applicant or an employee in order to determine eligibility for a Reasonable Accommodation. An applicant or an employee may be asked to state how their disability limits their ability to perform the Essential Job Functions. Employees requesting a Reasonable Accommodation must participate in the Interactive Process.

**Manager:** Identify the need for a Reasonable Accommodation and guide an employee to appropriate resources to process their request. An employee's manager must participate in the Interactive Process.

**Human Resources Business Partner:** Provide guidance to an employee or to a manager to process a request for a Reasonable Accommodation. A Human Resources Business Partner will be expected to participate in the Interactive Process.

**University Human Resources:** Provide support and guidance to an applicant, an employee, an employee's manager, and other subject matter experts throughout the Reasonable Accommodation process. University Human Resources will facilitate communications during the Interactive Process.

**Reasonable Accommodation Administrator:** Brown's third-party Reasonable Accommodation vendor. The vendor will provide support to determine the eligibility of an applicant or an employee for a Reasonable Accommodation under the applicable federal and state laws and regulations.

**Reasonable Accommodation Specialist:** A Reasonable Accommodation Specialist serves as the employee's primary point of contact throughout the Reasonable Accommodation process. The Specialist is responsible for managing an employee's request for a Reasonable Accommodation such as processing documentation to support a Reasonable Accommodation, distributing communications to an employee, an employee's manager, or to University Human Resources. The Reasonable Accommodation Specialist is an employee of Brown's third-party accommodation vendor.

## 5.0 Related Information

The following information compliments and supplements this document. The information is intended to help explain this SOP and is not an all-inclusive list of policies, procedures, laws and requirements.

### 5.1 Related University Policies:

- [Employment Accommodations for Persons with Disabilities](#)
- [Non-Discrimination and Anti-Harassment Policy](#)

### 5.2 Related SOPs: N/A

### 5.3 Related Forms:

- [Brown University: Americans with Disabilities Act \(ADA\) Accommodation\(s\) Request for Medical Certification](#)
- [Non-Discrimination and Anti-Harassment Complaint Form](#)

### 5.4 Frequently Asked Questions (FAQs):

- **When will I receive a decision about my accommodation request?**

A Reasonable Accommodation request decision depends on a variety of factors such as timely submission of sufficient medical documentation by an applicant or an employee and their engagement throughout the Interactive Process. Each situation is unique, and there is no standard timeframe in which a decision may be reached. Every effort will be made to provide a Reasonable Accommodation until a final decision is reached in a timely manner.

- **What can I do if my accommodation request was denied?**

An applicant or an employee may appeal the denial of a Reasonable Accommodation request through the University's ADA/Section 504 Coordinator as soon as practicable upon receipt of a denial. Brown University's ADA/Section 504 Coordinator can be reached at [oiied-intake@brown.edu](mailto:oiied-intake@brown.edu)

- **What do I do if I need to update or close my accommodation request?**

To update or close a pending Reasonable Accommodation request, please contact Brown's third-party Reasonable Accommodation Administrator, Broadspire, directly at 888-599-8576. Please have your accommodation request number available to provide to a Broadspire representative.

### 5.5 Other Related Information:

- [Equal Employment Opportunity Commission](#)

- [Americans with Disabilities Act of 1990 \(ADA\)](#)
- [Americans with Disabilities Act Amendments Act of 2008 \(ADAAA\)](#)
- [Fact Sheet New Regulations on Section 503 of the Rehabilitation Act of 1973](#)
- [Facts About the Americans with Disabilities Act](#)
- [The ADA: Your Employment Rights as an Individual with a Disability](#)

## 6.0 SOP Owner and Contact

**6.1 SOP Owners:** Vice President for University Human Resources

**6.2 SOP Approved by:** Vice President for University Human Resources

**6.3 Subject Matter Contact:** University Human Resources, Leave and Accommodation Manager

- Telephone: 401-863-2141
- Email: [Leave\\_admin@brown.edu](mailto:Leave_admin@brown.edu)

## 7.0 SOP History

**7.1 SOP Effective Date:** February 12, 2021

**7.2 SOP Last Reviewed:** N/A

**7.3 SOP Update/Review Summary:** New SOP.