

**PROCEDURES FOR PROCESSING REQUESTS  
FOR REASONABLE ACCOMMODATION**

**CHAPTER 6**

**REASONABLE ACCOMMODATION RECORDS MAINTENANCE**

I. REASONABLE ACCOMMODATION CASE FILE

A. Contents of the Case File: The reasonable accommodation case file will include the following documents, if applicable.

1. Reasonable Accommodation Request Form.
2. Letter requesting medical documentation.
3. Signed, permission to release medical information.
4. Medical documentation provided by employee's health professional.
5. Documentation of the essential functions of the employee's current position of record.
6. Documentation of all the interactive discussions with the employee, to include the discussion advising the employee of the reassignment option.
7. Documentation of the Advisory Team's disability analysis, to include all information considered in the analysis.
8. Listing of all reasonable alternatives considered for accommodating the employee, to include any supporting documentation.
9. Letter offering reassignment as an accommodation.
10. Employee's signed acceptance/declination of offer of reassignment.
11. Copy of activity HRO qualifications determination using the OPM Operating Manual for GS Positions or the FWS Qualification Handbook.

12. Employee's resume.
13. Listing of vacant positions identified at the activity level.
14. Commanding Officer certification that no vacant positions were available at the activity, to include summary of disability assessment and activity's job placement efforts.
15. Letter to HRSC to continue job search efforts.
16. Documentation of HRSC job search efforts.
17. HRSC letter to major claimant DCPD and activity HRO documenting that their job search efforts were not successful.
18. Copy of Priority Consideration Certificate.
19. Copy of Reasonable Accommodation Information Sheet provided selecting official.
20. Selecting official's documentation of essential functions of his/her vacancy.
21. Written job offer.
22. Documentation of employee's placement as a result of a reassignment action.
23. If job offer declined, employee's written declination.
24. Gaining activity's determination employee could not be placed in vacancy, to include reasons for non-placement.
25. Commanding Officer's certification of non-placement as a result of undue hardship.
26. Decision letter (approval or denial of request for accommodation).

27. Letter to major claimant CDEEOO to include summary of actions, disability analysis and decisions if employee is not placed.

28. Copy of final employment action, e.g., reassignment, removal letter, copies of SF-50s, disability retirement decision, etc.

B. Confidentiality of Medical Information:

1. The Rehabilitation Act of 1973 requires that all medical information be kept confidential.

a. All medical information obtained in connection with a request for reasonable accommodation must be kept separate from the individual's official personnel folder.

b. Individuals with access to medical information necessary to make a decision whether to grant a request for accommodation may not disclose this information. Exceptions to this provision are described in paragraph B.2. below.

c. Medical information will be kept in a secure file with access granted on a strictly limited basis.

2. Exceptions:

a. Supervisors and managers who need to know may be told about necessary restrictions on the work or duties of the employee and about the necessary accommodations.

b. First aid and safety personnel may be told if the disability may require emergency treatment. This exception would include sharing information about the type of assistance an individual may need in the event of an evacuation with medical professionals, emergency coordinators, floor captains, colleagues who have volunteered to act as "buddies", building security officers who need to confirm that everyone has evacuated, and other non-medical personnel who are responsible for ensuring safe evacuation. These individuals are entitled to the information necessary to fulfill their responsibilities under the activity emergency evacuation plan.

c. Government officials may be given information necessary to investigate the activity's compliance with the Rehabilitation Act.

d. In certain circumstances, information may be disclosed to workers' compensation offices or insurance carriers.

e. EEO officials may be given the information to maintain records and evaluate and report on the activity's performance in processing reasonable accommodation requests.

f. If medical information is disclosed to any of the individuals described above, the activity must inform these individuals that this information must be kept confidential and is subject to the provisions of the Privacy Act.

## II. RECORDS MAINTENANCE

A. Responsibility for Maintenance: The servicing EEO Office of the activity where the individual is employed is responsible for maintaining the reasonable accommodation case file.

B. Retention of Records: Activities will retain records related to a particular employee who has requested a reasonable accommodation for the duration of that individual's employment.

C. Records Disposal: Records maintained in this system of records will be retained and disposed of in accordance with the provisions of the OPM Government wide Systems of Records, 65 FR 27432.