



Reasonable Accommodation Policy

Policy Type: Employment Policy

Issuer: Human Resources

Review Frequency: Annual

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General Statement and Purpose

It is the policy of Capital Communications Federal Credit Union and its Subsidiaries (CAP COM) to reasonably accommodate qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, and other terms, conditions, and privileges of employment.

CAP COM will reasonably accommodate qualified individuals with a disability in an effort to assist them in performing the essential functions of a job.

A qualified applicant with a disability who with or without reasonable accommodation can perform the essential functions of the position for which they are applying will be given the same consideration for that position as any other applicant. CAP COM will reasonably accommodate individuals with a disability in the application process required to be considered for employment with CAP COM.

All employees are required to comply with safety standards. Applicants who pose a direct threat to the health or safety of themselves or others, which threat cannot be eliminated by reasonable accommodation, will not be hired or retained. Current employees who pose a direct threat to the health and safety of themselves or others may be placed on leave while it is determined if the direct threat can be eliminated through reasonable accommodation.

This Policy and Procedure is written to comply with applicable federal and state law. To the extent that the policy and procedure is inconsistent with applicable law or regulations, the law or regulations will govern. CAP COM intends to honor this policy and the procedures set forth below, but reserves the right to make legally compliant changes to them at any time, with or without notice, at its sole discretion.

Scope and Responsibility

All CAP COM employees and contingent workers are covered by and responsible for compliance with this policy. Supervisors and managers are responsible and accountable for ensuring adherence to this policy. Human Resources staff provides assistance to employees and management in enforcing this policy, as needed.

Policy

- A. An employee with a disability who would like to request a reasonable accommodation should contact Human Resources. If an employee makes a reasonable accommodation request to someone other than Human Resources, such as their supervisor or manager, they will be referred to Human Resources. The employee should not provide medical information to their supervisor or manager.
- B. A representative from Human Resources will meet with the employee, provide the employee with the Reasonable Accommodation Request Form and commence an informal, interactive process of



determining what, if any, accommodation should be provided. As part of this process, Human Resources and the employee will discuss the request, the precise nature of the problem that is generating the request, how a disability is prompting a need for an accommodation, and alternative accommodations that may be effective in meeting the employee's needs.

- C. Where appropriate, Human Resources will provide the employee with a Certification of Health Care Provider or other request for medical documentation supporting the requested accommodation and, in some cases, the employee may be required to submit to an examination by a physician designated by CAP COM, at CAP COM's expense.
- D. When necessary to evaluate CAP COM's ability to provide a requested accommodation, Human Resources will send the "Essential Job Function Analysis" form to the employee's supervisor for completion, signature, and return to HR.
- E. Upon receipt of all required information and documentation, a determination will be made regarding the employee's request for accommodation. Human Resources, in consultation with the employee's supervisor, will inform the employee in writing regarding the decision. Written approval consists of a letter to the employee from HR and an "Accommodation Approval" form signed by Human Resources, the employee's supervisor and employee, acknowledging receipt.

Leave as a Reasonable Accommodation

- A. Use of accrued paid leave, or unpaid leave, is a form of reasonable accommodation when necessitated by an employee's disability. When CAP COM provides an employee with leave as a reasonable accommodation, the employee must first exhaust accrued paid time off unless the leave is FMLA protected and the employee is receiving Workers' Compensation or Disability benefits, in which case the employee may elect, but is not required, to use accrued paid time off to bring them to 100% compensation.
- B. An employee with a disability who is granted leave as a reasonable accommodation will be returned to their same position unless holding the position open would impose an undue hardship.
- C. Leave granted as reasonable accommodation will run concurrently with leave available under the Family and Medical Leave Act Policy.

Employee Responsibilities

- A. Employees on leave are required to adhere to all applicable CAP COM policies including, but not limited to, the Family Medical Leave Act Policy.
- B. As with any other leave of absence, employees granted a leave as a reasonable accommodation may not continue or accept outside or supplemental work (employment) without prior written authorization from CAP COM. It is the employee's responsibility to inform Human Resources of the employment opportunity and request written authorization.
- C. Employees provided leave as a reasonable accommodation are required to notify their supervisor at least monthly of their status and intent to return to work. Employees should notify their supervisor or Human Resources of any change in the expected duration of their leave as soon as possible.



- D. Prior to returning from leave, employees will be required to provide a medical documentation clearing them to return to work and detailing any limitations or restrictions and the expected duration thereof. On the day the employee returns, they must complete the necessary return to work process with Human Resources and may not resume active employment until doing so. Employees in the Branches may phone their HR Representative to conduct this return to work discussion.

Supervisor Responsibilities

- A. Supervisors must ensure that the employee connects with Human Resources prior to returning to active employment following a leave. This is critical to ensuring an employee will be returned to active status for payroll purposes.
- B. Managers/Supervisors must exercise extreme care and take appropriate precautions to ensure the privacy and security of an employee's health/medical information. All records pertaining to an employee's leave or medical condition must be sent immediately to Human Resources via confidential means. Copies of such medical information should never be retained within the department.

Human Resources Responsibilities

- A. Human Resources maintains all employee medical records (either physically or via electronic security measures) separately from employment records and ensures they are kept in a secure, locked area within the Human Resources Department or stored electronically in secure systems with highly restricted access.
- B. Human Resources will share information related to an employee's medical condition only with those who have a valid need to know.

Policy Enforcement

Violations of this policy may result in corrective action, up to and including termination of employment.

Related Documents:

- Equal Employment Opportunity Policy
- Family and Medical Leave Act Policy
- Workplace Health Policy
- Essential Job Function Analysis Form
- Job Description
- Reasonable Accommodation Request Form

Approved:

A handwritten signature in black ink, appearing to read "Chris McKenna", written over a horizontal line.

Christopher McKenna, President/CEO