

Title: Reasonable Accommodation Policy

Issue Date: 2.4.2012

Type: Employment Policy

Issuer: Human Resources

Revision Date:

Review Frequency: Annual

4.1.2014

GENERAL STATEMENT and PURPOSE of POLICY:

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

The Credit Union 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 he/she is applying will be given the same consideration for that position as any other applicant. The Credit Union will reasonably accommodate individuals with a disability in to application process required to be considered for employment with the Credit Union.

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.

Current employees who pose a direct threat to the health and safety of themselves or others may be placed on appropriate leave until an organizational decision has been made in regard to the employee's employment situation (e.g., a determination has been made that the direct threat can be eliminated through reasonable accommodation).

Capital Communications Federal Credit Union and its Subsidiaries intend to honor this policy and the procedures set forth below, but reserve the right to change them at any time, with or without notice, at their sole discretion.

SCOPE and RESPONSIBILITY:

All Credit Union employees, contingent workers and visitors are covered by and responsible for compliance with this policy. Supervisors and managers are responsible and accountable for ensuring adherence to this policy. Employees are encouraged to assist in the education and enforcement of this

policy with visitors. Human Resources staff provides assistance to employees and management in enforcing this policy, as needed.

POLICY:

- A. An employee who would like to request a reasonable accommodation should contact Human Resources. The employee is not required to provide personal health details to their supervisor. A representative from Human Resources will meet with the employee to determine if CAP COM can assist the employee in the performance of their job duties. Simple accommodations, such as a request for a key pad or a mouse, can be reviewed based on a doctor's note submitted to Human Resources by the employee.
- B. Following a discussion with an employee regarding a request for accommodation, Human Resources will send the "Essential Job Function Analysis" form to the employee's supervisor for completion and signature, and management will return the form to HR.
- C. Once the "Essential Job Function Analysis" form is returned to HR, the employee will be given copies of this form, the "Reasonable Accommodation Request" form, and the "Certification of Health Care Provider" form and memo, with instructions to bring all this information to their health care provider for completion, signature and return to HR.
- D. Once the "Certification of Health Care Provider" form is returned to HR, 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.
- E. Appeals of the decision may be made in writing to the Director of Human Resources and Corporate Training. If the employee cannot resolve his or her issues with the Director, the final/appeal decision will be made by the President/CEO.

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 the Credit Union provides an employee with leave as a reasonable accommodation, the employee must first exhaust accrued paid time off unless the employee is receiving Workers' Compensation or Disability benefits.

- B. An employee with a disability who is granted leave as a reasonable accommodation will be returned to his/her same position unless holding open the position 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 Credit Union policies including, but not limited to, the Family Medical Leave Act Policy.
- B. Employees on a leave may not continue or accept outside or supplemental work (employment) without prior written authorization from the Credit Union. It is the employee's responsibility to inform Human Resources of the employment opportunity and request written authorization.
- C. As part of the process of determining an appropriate reasonable accommodation, employees may be required to submit to an examination by a physician designated by the Credit Union, at the Credit Union's request and expense.
- D. Employees on 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.
- E. On the day an employee returns from a leave, she/he is required to provide a return to work authorization (if applicable) and complete the necessary return to work process. Employees may not resume active employment until meeting these requirements directly with HR. Employees in the Branches may phone their HR Representative to conduct this return to work discussion.
- F. Employees returning to work from a leave due to their disability must provide Human Resources with documentation from their health care provider authorizing their return to work, identifying any limitations or restrictions, and the duration thereof.

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. NOTE: Branch employees may contact their HR Representative by phone to conduct this return to work discussion.

- 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:



4/1/2014

President/CEO

Date