



Policy Title:	ADA/ADAAA Policy
Policy #:	06-001-0200
Effective Date:	08/04/2026
Approved by:	Telly Delor, Chief Operating Officer
Functional Area:	Human Resources
Responsible Leader:	Stephanie Shank, Human Resource Director
Policy Owner:	Kristy Dennis, Human Resource Manager
Applies to:	SCCCMH Employees

Purpose: To ensure St. Clair County Community Mental Health's (SCCCMH) compliance with the Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA), and to affirm SCCCMH's commitment to providing equal employment opportunities and reasonable accommodations for qualified employees with disabilities. This policy reflects and reinforces SCCCMH's CARES values, Compassion, Accessibility, Relationships, Empowerment, and Service Excellence, by promoting an inclusive and supportive work environment.

I. Policy Statement

It is the policy of St. Clair County Community Mental Health (SCCCMH) to commit to fostering an inclusive and supportive workplace for employees with disabilities. In accordance with the ADA, the ADAAA, and applicable state laws, SCCCMH provides equal employment opportunities and reasonable accommodations for qualified employees. For the purposes of this policy, the term "employee" also includes job applicants, where applicable.

Accommodation is provided in a manner that enables employees to perform the essential functions of their positions, or for applicants, to participate meaningfully in the hiring process, unless doing so would impose an undue hardship on SCCCMH or compromise safety.

II. Standards

A. Non-Discrimination and Equal Opportunity

SCCCMH ensures equitable access to employment opportunities by proactively applying non-discriminatory practices in recruitment, selection, onboarding, job assignment, performance evaluation, and advancement. Decisions are based on the

ability to perform essential job functions, with or without reasonable accommodation. SCCCMH also promotes awareness of disability inclusion and educates employees on rights and responsibilities under the ADA and ADAAA.

B. Reasonable Accommodations

SCCCMH provides reasonable accommodations to qualified employees with disabilities, unless doing so would cause an undue hardship or pose a direct threat to the health or safety of the employee or others that cannot be mitigated.

Accommodation may include modifications to the work environment, job restructuring, adjusted work schedules, assistive technology, or other supports that enable employees to perform essential job functions.

C. Use of the Interactive Process

SCCCMH engages in a good-faith, timely, and interactive process with employees who request an accommodation. This process includes reviewing the essential job functions, identifying limitations, considering possible accommodations, and selecting an effective solution. SCCCMH prioritizes open communication, employee input, and flexibility throughout the process.

D. Recognition of Accommodation Requests

Requests for accommodations may be made verbally or in writing and do not need to reference the ADA or use the term “reasonable accommodation.” To support this process, SCCCMH offers an **ADA Reasonable Accommodation Request Form**, which employees may use to help articulate their needs. Use of the form is voluntary and is not required to initiate the accommodation process. Medical documentation may be requested if the condition or need is not obvious.

E. Confidentiality and Documentation

All medical information and documentation obtained during an accommodation request is treated as confidential and maintained in separate files in compliance with ADA requirements. Information is only shared on a need-to-know basis to provide an approved accommodation. Medical documentation related to an accommodation request will be maintained in a confidential file separate from the employee’s personnel file.

F. Prohibited Conduct

SCCCMH does not tolerate retaliation, coercion, interference, or harassment against employees who request an accommodation, participate in the interactive process, or otherwise assert their rights under the ADA/ADAAA.

G. Responsibilities of Human Resources and Supervisors

The Human Resources department is responsible for coordinating the interactive process, maintaining documentation, and ensuring compliance. Supervisors are responsible for working in partnership with HR, implementing approved accommodations, and preserving employee confidentiality.

H. Approval of Accommodations

When proposed accommodation involves facility modifications, equipment purchases, workspace changes, or other operational or budgetary considerations, Human Resources will coordinate with the appropriate department leadership and secure any necessary operational approvals prior to implementation. This ensures accommodation is implemented in a manner that supports both the employees' needs and organizational operations.

I. Ongoing Review and Adjustment

Approved accommodations are subject to periodic review to ensure continued effectiveness. SCCCMH acknowledges that changes in job duties, technology, medical conditions, or workplace circumstances may require adjustments to accommodations.

III. Procedures, Definitions, and Other Resources

A. Procedures

Actions

Action Number	Responsible Stakeholder	Details
1.0	Employee	Communicate the need for workplace accommodation related to a medical condition or limitation. Employees may choose to document their request using the ADA Reasonable Accommodation Request Form .
2.0	Supervisor	Recognize potential accommodation requests and promptly refer the employee to the Human Resources Department. Supervisors should not request medical details and should forward all accommodation-related requests to Human Resources for review.
3.0	Human Resources	Initiate and facilitate the interactive process by consulting with the employee to understand limitations, essential job functions, and workplace barriers. Human Resources may use the ADA Accommodation Checklist to guide the interactive process.
4.0	Human Resources	Gather relevant information to evaluate the request. If the disability or need for accommodation is not obvious, Human Resources may request limited medical documentation using the ADA Medical Certification Form , which may be completed by the employee's healthcare provider.
5.0	Human Resources	Review essential job functions and explore possible accommodation options, considering employee preferences and operational feasibility. Human Resources may obtain input from the employee, and consult with supervisors, healthcare providers, or external resources. Potential options may be documented

Action Number	Responsible Stakeholder	Details
		using the <i>ADA Accommodation Checklist</i> .
6.0	Human Resources	Determine the most appropriate effective accommodation in consultation with the employee and consistent with agency approval requirements, obtaining any necessary approvals from appropriate leadership. communicate the decision to the employee and document the outcome of the accommodation request.
7.0	Human Resources / Supervisor	Coordinate and implement the approved accommodation while maintaining confidentiality of medical information.
8.0	Human Resources	Monitor the effectiveness of the accommodation and conduct follow-up reviews as needed. Documentation of the accommodation and follow-up actions may be maintained using the <i>ADA Accommodation Checklist</i> . Adjustments may be made if job duties, employee needs, or operational conditions change.

B. Related Policies

1. Personnel: Harassment in the Workplace, Policy #06-001-0105
2. Personnel: Leaves of Absence: FMLA, Policy #06-001-0040

C. Definitions

1. ***Disability***: A physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment.
2. ***Major Life Activities***: Functions such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.
3. ***Qualified employee with a Disability***: An employee who meets the skill, experience, education, and other job-related requirements of a position and who, with or without reasonable accommodation, can perform the essential functions of the position.
4. ***Reasonable Accommodation***: A modification or adjustment to a job, the work environment, or the way things are customarily done that enables a qualified employee with a disability to apply for a job, perform job duties, or enjoy equal access to employment benefits. Examples may include job restructuring,

modified schedules, acquiring assistive devices, or making facilities accessible.

5. *Undue Hardship*: An accommodation that would result in significant difficulty or expense to the employer, considering factors such as financial resources, the nature of the operation, and the impact on business operations.
6. *Essential Job Functions*: Fundamental job duties of the position the employee holds or desires. A function may be essential if the position exists to perform that function, if there are a limited number of employees available to perform it, or if it is highly specialized.
7. *Interactive Process*: Ongoing, collaborative communication between the employer and employee to determine whether an effective and reasonable accommodation can be provided. This process includes reviewing job duties, limitations, and potential accommodations.
8. *Direct Threat*: A significant risk of substantial harm to the health or safety of the employee or others that cannot be eliminated or reduced by reasonable accommodation.
9. *Medical Documentation*: Information from a healthcare provider that may be requested to confirm a disability and need for accommodation, only when the condition or limitation is not obvious or already known.
10. *Trial Accommodation*: A temporary implementation of an accommodation to assess its effectiveness before making it permanent. Used when there is uncertainty about whether the accommodation will meet the needs of the employee and the employer.
11. *Americans with Disabilities Act (ADA)*: A federal civil rights law enacted in 1990 that prohibits discrimination against employees with disabilities in employment, public services, public accommodations, and telecommunications. Title I of the ADA specifically addresses employment-related protections and requires employers to provide reasonable accommodations to qualified employees with disabilities.
12. *Americans with Disabilities Act Amendments Act (ADAAA)*: An amendment to the ADA, effective in 2009, that broadened the definition of disability and reinforced the intent of the original law. The ADAAA clarified that the determination of disability should be made broadly in favor of coverage and that employees with episodic or in-remission conditions may still qualify as having a disability.

D. Forms

1. [#0834 ADA Reasonable Accommodation Request Form](#)

2. [#0835 ADA Medical Certification Form](#)
3. [#0836 ADA Accommodation Checklist](#)

E. Other Resources (i.e., training, secondary contact information, exhibits, etc.)

1. Job Accommodation Network (JAN)
2. Society for Human Resource Management (SHRM)

F. References

1. Americans with Disabilities Act (ADA), 1990
2. Americans with Disabilities Act Amendments Act (ADAAA), 2008
3. U.S. Equal Employment Opportunity Commission (EEOC) Guidance

IV. History

- Initial Approval Date: 07/2026
- Last Revision Date: BY:
- Last Reviewed Date: BY:
- Non-Substantive Revisions: BY:
- Key Words: