

# ALERON

## Reasonable Accommodation to Enhance the Employability and Retention of Persons with Disabilities Policy

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### Policy

The company is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is the key to this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment without the accommodation process. It is our policy to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship.

### Who Can Request a Reasonable Accommodation?

The company will follow applicable Federal, State or Provincial guidelines and statutes as they relate to reasonable accommodation of individuals with disabilities, such as:

- When an applicant with a disability needs an accommodation to have an equal opportunity to compete for a job they are qualified for;
- When an employee with a disability needs an accommodation to perform the essential functions of the job or to gain access to the workplace;
- When an employee with a disability needs an accommodation to enjoy equal access to benefits and privileges of employment (e.g., details, trainings, etc.); and
- When an applicant or employee needs an accommodation on the basis of pregnancy, childbirth, or related medical conditions, including, but not limited to, lactation.

### Definition of Disability

Disability: For purposes of determining eligibility for a reasonable accommodation, a person with a disability is: (1) one who has a physical or mental impairment that substantially limits one or more major life activities and (2) has a record of such an impairment.

### Definition of a Reasonable Accommodation

A reasonable accommodation is a modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy an equal employment opportunity.

### Responsible Official Contact Information

The company has designated the Manager of Human Resources Compliance and Benefits to oversee the reasonable accommodations program company-wide. All requests for reasonable accommodation will be managed by the Manager of Human Resources Compliance and Benefits.



## How to Request a Reasonable Accommodation and Who to Contact

Generally, an applicant or employee must inform the company that he or she needs an adjustment or change concerning some aspect of the application process, the job, or a benefit of employment for a reason related to a medical condition.

Requests for reasonable accommodations may be oral or written and there are no required words such as “reasonable accommodation” or “disability” that must be used by the requestor. A request is any communication in which an individual asks or states that he or she needs the company to provide or to change something because of a medical condition.

	Who to Contact	How to Contact the Manager of Human Resources Compliance and Benefits or Senior Benefits Administrator
Applicant	Manager of Human Resources Compliance and Benefits or Recruiter	<a href="mailto:ReasonableAccommodations@aleroninc.com">ReasonableAccommodations@aleroninc.com</a> or 1-800-568-8310
Employee	Manager of Human Resources Compliance and Benefits or Branch Representative	<a href="mailto:ReasonableAccommodations@aleroninc.com">ReasonableAccommodations@aleroninc.com</a> or 1-800-568-8310
Third Party on Behalf of Person with a Disability (e.g., a family member, health professional, or other representative)	Manager of Human Resources Compliance and Benefits or Branch Representative	<a href="mailto:ReasonableAccommodations@aleroninc.com">ReasonableAccommodations@aleroninc.com</a> or 1-800-568-8310

## What Should a Branch Representative Do When They or a Customer Receive a Request for a Reasonable Accommodation

If a request is given to a Branch Representative or customer, rather than directly to the Manager of Human Resources Compliance and Benefits, that individual should forward the request immediately by e-mail to **Reasonable Accommodation** or [ReasonableAccommodations@aleroninc.com](mailto:ReasonableAccommodations@aleroninc.com) and must do so within two (2) business days.

## Recurring Requests

An employee requiring a reasonable accommodation on a recurring basis, such as the assistance of a sign language interpreter, must submit the “Request for Reasonable Accommodation” form only for the first request. However, the employee requesting accommodation must give appropriate advance notice each subsequent time the accommodation is needed.

### **Written Confirmation of Request**

The Manager of Human Resources Compliance and Benefits or Senior Benefits Associate will provide a written e-mail confirmation or mail the confirmation form to the applicant or employee's home address indicating that their request for a reasonable accommodation was received and is being processed.

### **Timeframe for Processing Requests**

The Manager of Human Resources Compliance and Benefits or Senior Benefits Associate will contact the applicant or employee within ten (10) business days after the request is made (even if the request is initially made by someone else) to begin discussing the accommodation request. In some instances, the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate may need to obtain information to determine if an individual's impairment is a "disability" under the law or to determine what would be an effective accommodation.

The time frame for processing a request (including providing accommodation, if required) is as soon as possible but no later than thirty (30) business days from the date the request is made. This 30-day period includes the 10-day time frame in which the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate must contact the requestor after a request for reasonable accommodation is made.

If the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate requests medical information or documentation from the requestor or the requestor's doctor, the time frame will stop on the day that the company makes a request to the individual to obtain medical information or sends out a request for information/documentation, and will resume on the day that the information/documentation is received by the company.

### **Expedited Processing of a Request**

In certain circumstances, a request for reasonable accommodation requires an expedited review and decision. This includes where a reasonable accommodation is needed:

- To enable an applicant to apply for a job. Depending on the timetable for receiving applications, conducting interviews, taking tests, and making hiring decisions, to ensure that an applicant with a disability has an equal opportunity to apply for a job.
- To enable an employee to attend a meeting scheduled to occur soon. For example, an employee may need a sign language interpreter for a meeting scheduled to take place in five days.

### **Extenuating Circumstances**

When extenuating circumstances (circumstances that could not reasonably have been anticipated or avoided in advance of the request for accommodation) are present, the time frame for processing a request for reasonable accommodation and providing the accommodation will be extended as reasonably necessary. Extensions will be limited to circumstances where they are absolutely necessary and only for as long as required to deal with the extenuating circumstances.

## **Confidentiality**

Medical information obtained in connection with the reasonable accommodation process must be kept confidential and in a separate file from the individual's personnel file. This includes the fact that an accommodation has been requested or approved and any information about functional limitations. It also means that any company employee who obtains or receives such information is strictly bound by these confidentiality requirements.

The Manager of Human Resources Compliance and Benefits or Senior Benefits Associate may share certain information with an employee's supervisor or customer as necessary in order to make appropriate determinations on a reasonable accommodation request. Under these circumstances, the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate will inform the recipients about these confidentiality requirements. The information disclosed will be no more than is necessary to process the request.

In addition to disclosures of information needed to process a request for accommodation, other disclosures of medical information are permitted as follows:

- Supervisors and managers are entitled to whatever information is necessary to implement restrictions on work or duties of the employee or to provide a reasonable accommodation;
- First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment or assistance in evacuation; and
- Government officials may be given information necessary to investigate the company's compliance with the laws.

## **The Interactive Process**

Engaging in an interactive process through which the employer and employee work together to arrive at a reasonable accommodation, the steps which may be followed are:

1. The company will analyze the particular job involved to determine its purpose and essential functions.
2. The company and the individual with the disability should work together to identify what barriers exist to that individual's performance of a particular job function. This analysis should include a review of the individual's abilities and limitations and a determination as to which factors in the work environment or job tasks pose difficulties.
3. The company working with the individual with a disability should identify a range of possible accommodations that have the potential to remove the difficulties, either in the work environment or job tasks, and which would allow the individual to perform the essential functions of the job.
4. Having identified various possible accommodations, the company will assess the effectiveness of each accommodation and the preference of the individual to be accommodated and then determine whether the various accommodations would pose an undue hardship upon the employer. If more than one accommodation is effective, the employer providing the accommodation has the ultimate discretion to choose between effective accommodations.

## **The Need for Supporting Medical Documentation**

If a requestor's disability and/or need for accommodation are not obvious or already known, the company is entitled to ask for and receive medical information showing that the requestor has a covered disability that requires accommodation. A disability is obvious or already known when it is clearly visible or the individual previously provided medical information showing that the condition met the guidelines of the law. It is the responsibility of the applicant/employee to provide appropriate medical information requested by the company where the disability and/or need for accommodation are not obvious or already known.

Only the Manager of Human Resources Compliance and Benefits and/or Senior Benefits Associate may determine whether medical information is needed and if so, may request such information from the requestor and/or the appropriate health professional. Even if medical information is needed to process a request, the company does not necessarily have to request medical documentation from a health care provider; in many instances, the requestor may be able to provide sufficient information that can substantiate the existence of a "disability" and/or need for a reasonable accommodation.

- If the initial information provided by the health professional or volunteered by the requestor is insufficient to enable the company to determine whether the individual has a "disability" and/or that an accommodation is needed, the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate will explain that additional information is needed.
- If necessary, the individual should ask his/her health care provider or other appropriate professional to provide the missing information. The company may also give the individual a list of questions for the health care provider or other appropriate professional to answer.
- If sufficient medical information is not provided by the individual after several attempts, the company may ask the individual requesting accommodation to sign a limited release permitting the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate to contact the provider for additional information. The company may have the medical information reviewed by a doctor of the company's choosing, at the company's expense.

## **Resolution of the Reasonable Accommodation Request**

Upon the resolution of the reasonable accommodation request, the Manager of Human Resources Compliance and Benefits or Senior Benefits Associate will complete the *Resolution of Reasonable Accommodation Request* form to document what accommodation(s), if any, were decided upon.

## **Informal Dispute Resolution**

An individual who disagrees with the resolution of the request may ask the Chief of Human Resources to reconsider that decision within ten (10) business days of receiving the resolution by e-mailing [ReasonableAccommodations@aleroninc.com](mailto:ReasonableAccommodations@aleroninc.com) or calling 1-800-568-8310.

**Training**

The company will provide training to all of its supervisors and managers on the reasonable accommodation process.