

	Reasonable Accommodations Policy – Americans with Disabilities Act	
	Section No: 2.16	
	Category: Workplace Conduct and Compliance Policies	
	Resolution Number: 257-2026	
	Effective Date: September 1, 2026	
	Supersedes: N/A	
	Next Review Date: September 1, 2028	
Responsible Office: Human Resources		
Policy Applies to:	☒ All City employees (Full-time, Part-time, LSEs, temps, etc.) ☐ All City and School Employees	☐ Full-Time employees only ☐ Other: _____

Relevant Definitions

Disability: A physical or mental impairment that substantially limits one or more major life activities of an individual; a record of such an impairment; or being regarded as having such an impairment, as defined by the Americans with Disabilities Act (ADA).

Reasonable Accommodation: A modification or adjustment to a job, work environment, or employment practice that enables a qualified individual with a disability to perform the essential functions of the position or enjoy equal employment opportunities.

Essential Functions: The fundamental duties of a position that an employee must be able to perform, with or without reasonable accommodation. Essential functions do not include marginal or incidental job duties.

Interactive Process: A collaborative dialogue between the employer and the employee or applicant to identify potential reasonable accommodations that would enable the individual to perform the essential functions of the position.

Undue Hardship: An action requiring significant difficulty or expense when considered in relation to factors such as the organization's size, financial resources, nature of operations, and the cost of the accommodation.

Medical Documentation: Information provided by a healthcare physician that confirms the existence of a disability and the need for a reasonable accommodation, when permitted by law.

Reassignment: The placement of an employee into a vacant position for which the employee is qualified when the employee can no longer perform the essential functions of their current position, with or without reasonable accommodation.

Temporary Accommodation: An interim accommodation provided while additional information is being reviewed or while a long-term accommodation is being evaluated.

Permanent Accommodation: A reasonable accommodation that is approved without a predetermined end date based on an ongoing medical condition or disability. Permanent accommodations remain in effect unless the employee's medical condition, job duties, operational needs, or the effectiveness of the accommodation changes, requiring reevaluation through the interactive process.

Retaliation

Any adverse action taken against an individual for requesting an accommodation, participating in the interactive process, filing a complaint, or exercising rights under the ADA or related laws.

Policy

It is the policy of the City to comply with all applicable provisions of the Americans with Disabilities Act (ADA) and other applicable federal and state laws prohibiting discrimination against individuals with disabilities. The organization is committed to providing equal employment opportunities and reasonable accommodations to qualified individuals with disabilities unless doing so would create an undue hardship on the organization's operations.

The organization will provide reasonable accommodations to qualified applicants and employees with known physical or mental disabilities to enable them to perform the essential functions of their job or to enjoy equal employment opportunities.

Reasonable accommodations are determined on a case-by-case basis through an interactive process between the employee, Human Resources, and department head. The following are examples of accommodations that may be considered, when appropriate, and do not represent a complete list:

- Making existing facilities readily accessible to and usable by individuals with disabilities.
- Modifying workstations, office equipment, furniture, or work areas.
- Providing or modifying equipment, tools, or assistive technology.
- Providing qualified readers, interpreters, or other communication assistance.
- Modifying work schedules, including flexible start and end times or adjusted break schedules.
- Reassignment to a vacant position for which the employee is qualified, when no effective accommodation enables the employee to perform the essential functions of their current position.

Reasonable accommodations are intended to enable qualified individuals with disabilities to perform the essential functions of their position or to enjoy equal employment opportunities. The City is not required to eliminate essential job functions, lower performance or conduct standards, create a new position, provide personal-use items, or provide an accommodation that would impose an undue hardship or pose a direct threat to the health or safety of the employee or others.

Determination and Documentation

Upon completion of the interactive process, the Human Resources Department will provide the employee with a written memorandum outlining the determination, including any approved reasonable accommodation(s), the effective date, any applicable conditions or expectations, or the reason an accommodation request was denied. A copy of the memorandum will also be provided to the employee's supervisor to facilitate implementation of the accommodation, as appropriate, and a copy will be maintained in the employee's personnel file in accordance with the City's record retention practices.

Review of Reasonable Accommodations

Reasonable accommodations are subject to periodic review to ensure they continue to effectively enable the employee to perform the essential functions of the position and remain reasonable under current circumstances. Unless otherwise specified, accommodations will be reviewed at least annually and may be reviewed more frequently if warranted by changes in the employee's medical condition, job duties, work environment, operational needs, or the effectiveness of the accommodation.

Employees are expected to notify the Human Resources Department if their accommodation is no longer effective, if their limitations or needs change, or if they believe a modification to the accommodation is necessary. Likewise, supervisors should notify the Human Resources Department of any changes that may affect the accommodation or the employee's ability to perform the essential functions of the position.

The City reserves the right to modify, continue, or discontinue a reasonable accommodation following an appropriate review and, when applicable, the interactive process.

Related Information or Procedures:

Employee Responsibilities

Employees requesting an accommodation are responsible for notifying Human Resources and their supervisor of the need for an accommodation. The employee may be required to provide appropriate medical documentation supporting the request when permitted by law.

Interactive Process

Upon receiving a request for accommodation, the organization will engage in a timely, good-faith interactive process with the employee or applicant to determine whether a reasonable accommodation can be provided.

The organization may request medical documentation that is job-related and consistent with business necessity to evaluate the accommodation request.

As part of the interactive process an end date or review date will be noted.

Undue Hardship

Reasonable accommodations will be provided unless the accommodation would impose an undue hardship on the operation of the organization. Undue hardship is determined on a case-by-case basis and may include significant difficulty or expense.

Non-Retaliation

The organization prohibits retaliation against any employee or applicant for requesting a reasonable accommodation, participating in the accommodation process, or exercising rights under the ADA or related laws.

Confidentiality

All medical information obtained in connection with a request for accommodation will be maintained in a confidential manner and kept separate from personnel files in accordance with applicable laws.

Consequences of Policy Violation

Employees are expected to comply with all requirements within the policy, including providing proper notice, submitting required documentation, and adhering to accommodations. Violations of this policy may result in corrective or disciplinary action, consistent with the City's Corrective Action Policy.

Other Provisions:

Nothing in this policy should be construed to conflict with or supersede state or federal law, or as interfering with the constitutional rights of employees.

While the city is committed to the principles embodied in this policy, the policy itself is not intended to state contractual terms and does not constitute a contract between the city and its employees. Furthermore, this statement constitutes ONLY the policy of the city. A finding of a violation of this policy does not mean that the conduct violates state and/or federal laws.

Contacts

The following office can address questions regarding this Policy: Human Resources Office, phone: (423) 229-4901, email: HROffice@kingsporttn.gov.