

**CENTRAL IOWA HEALTH SYSTEM  
GRADUATE MEDICAL EDUCATION COMMITTEE**

**POLICY ON ACCOMMODATIONS FOR DISABILITIES**

The Graduate Medical Education Committee has adopted the UnityPoint Health - Des Moines Americans with Disabilities Act (ADA) policy as the Graduate Medical Education Committee policy on accommodations for disabilities. The most current copy of this policy can be found on the intranet under the DocuCenter link.



## **Americans With Disabilities Act (ADA)**

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*Candidates with disabilities may be hired to fill any position for which they are qualified. UnityPoint Health - Des Moines will make reasonable accommodations to enable employees with disabilities to perform the essential functions of their jobs and to ensure equal access to the benefits and privileges of employment.*

### **Policy**

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UnityPoint Health - Des Moines is committed to complying with the Americans With Disabilities Act of 1990. The Act prohibits discrimination against a qualified individual with a disability in regard to job application procedures, hiring, advancement or discharge of employees, compensation, job training, and other terms, conditions, and privileges of employment. The intent of this policy is to comply with the law, not expand it. The ADA does exclude some disorders.

#### **Employment Decisions**

The ADA policy and accompanying procedures are designed to prevent discrimination. Employment decisions will be based on the abilities of individual applicants, and not on the basis of presumptions or generalizations about a class of individuals.

#### **Reasonable Accommodation**

Human Resources management will administer this policy and direct UPHDM efforts to provide reasonable accommodations to qualified individuals with known physical or mental impairments, while monitoring the impact on UnityPoint Health - Des Moines to prevent undue hardship. Generally, the individual with a disability must inform the employer that an accommodation is needed.

### **Procedures**

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#### **Definitions:**

##### **Qualified Individual with a Disability**

A qualified individual with a disability is an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the position held or desired.

##### **Reasonable Accommodation**

Reasonable accommodations may include:

- Making existing facilities used by employees readily accessible to and usable by, individuals with disabilities.
- Job restructuring, part-time or modified work schedules, reassignment to a vacant positions, acquisition or modification of equipment or devised, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations.

## **Undue Hardship**

Undue hardship means an action that requires significant difficulty or expense when considered in light of factors such as:

- The nature and cost of the accommodation.
- The overall financial resources, the number of staff, the effect on expenses, and overall impact on the operations of UnityPoint Health - Des Moines.
- The composition, structure, and functions of the work force at UPHDM.

## **Disability**

A person is disabled if they:

- Have a physical or mental impairment that substantially limits one or more major life activities.
- Have a record of such impairment or are regarded as having such an impairment.

Physical or mental impairment includes:

- Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss.
- Any mental or psychological disorder.

The term does not include simple physical characteristics such as eye color. Environmental, cultural, and economic disadvantages are not covered.

## **Responsibilities:**

### **Human Resources Management**

Oversee and direct implementation of personnel practices in compliance with ADA. Maintain current accurate job descriptions outlining essential functions for all positions.

Monitor UPHDM contractual relationships to prevent participation in a contract or other management relationship that subjects a qualified applicant or employee with a disability to discrimination.

### **Disability Coordinator**

Receive and review all inquiries regarding and request for reasonable accommodations from individuals with disabilities.

Determine whether or not the individual is disabled and confirm the need for accommodation. Where the disability and the need for reasonable accommodation are not obvious or sufficient information does not exist, request documentation from individual to verify the existence of an ADA disability, functional limitation and the need for reasonable accommodation. Ensure individual has signed a limited release to allow disclosure.

Prepare for interactive process with individual. Actions may include conducting a job analysis and gaining an understanding of the essential functions.

Initiate and conduct interactive process with the individual to determine limitations and identify potential accommodations.

Consult with individual and department management to assess the effectiveness of possible accommodations.

Collaborate with individual and department management to select more appropriate reasonable accommodation.

Support implementation of the most appropriate accommodation.

Coordinate request and provision of reasonable accommodation as promptly as possible and avoid unnecessary delays.

Collaborate with Human Resources management in determining need for and approving requests that will not result in undue hardship to the department or UPHDM. Maintain confidential files related to requests for accommodation.

Receive any complaints or changes of discrimination in violation of ADA. Take appropriate action to mitigate potential liability.

### **Employee Health**

Conduct pre-placement physicals for all employees to whom job offers have been extended in accordance with ADA. After an employee is on duty, evaluations will be directly related to the individual's ability to perform essential functions of the job and will be consistent with business necessity. Rejections based on the disability may occur only when the disability would create a high probability of substantial harm in the particular job function.

Report to the Disability Coordinator all requests for reasonable accommodations.

Maintain separate confidential employee health files.

### **Department Management**

Comply with all provisions of the ADA policy, seeking assistance from Human Resources when issues arise.

Report all requests for accommodations from existing employees or applicants to the Disability Coordinator. Be sensitive to disability-related performance problems and the possibility of reasonable accommodations to correct the performance issue. Intervene when requested or when the situation presents a direct threat to the health or safety of others.

Participate in interactive process as needed and cooperate with Disability Coordinator to avoid unnecessary delays in identifying, selecting and providing the appropriate reasonable accommodation.

### **Accessibility Committee**

Evaluates UPHDM facilities to ensure compliance with Federal ADA laws.

Addresses patient, visitor and staff concerns related to access to facilities.

### **Qualified Individual With a Disability**

Request reasonable accommodation from department management or Disability Coordinator. (Employee makes known their need for change in the work environment, work practice, etc.)

Participate in interactive process to describe the problems posed by the workplace barrier, clarify the need and identify potential reasonable accommodation(s).

Provide documentation in sufficient detail (when requested by the employer) to establish that an ADA disability exists and that the disability necessitates a reasonable accommodation. Provide personal equipment of devices.

**Related Human Resources Policies:**

Attendance and Notification of Absence – Work Environment

Confidentiality of Personnel Records – Employment

Employee Selection – Employment

Harassment-Free Environment – Work Environment

Pre-placement Screening - Health

**Related Forms:**

**Effective Date:** August 1995

**Update Dates:** May 2007, May 2013

**Review Date:** May 2001