



RU Policy No. 2.1(A)

Responsible Division: Human Resources & Student Affairs

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Americans with Disabilities Act and Reasonable Accommodations Policy

Policy Statement

No Roosevelt University student, employee, or member of the public attending a University-sponsored event shall be excluded from participating in or denied the benefits of any University program, activity, or working opportunities on the basis of their disability. It is the policy of Roosevelt University to provide reasonable accommodations, as required by law, for qualified individuals with disabilities. The Illinois Human Rights Act (775 ILCS 5, et seq.) is the primary state law prohibiting disability discrimination in employment. Similarly, the primary federal law protecting people with disabilities from employment discrimination is the Americans with Disabilities Act of 1990, amended in 2008. This policy applies to all University employees, applicants for employment during the job application process, students, and visitors or guests to the University. Students requesting academic accommodations should contact the [Office of Disability Services](#).

Definitions

“Disability” means with respect to an individual: (a) a physical or mental impairment that substantially limits one or more major life activities of such individual; (b) a record of such an impairment; or (c) being regarded by the employer as having such an impairment.

“Essential Functions” means the fundamental job duties of the employment position the individual with a disability holds or desires. The term “essential functions” does not include the marginal functions of the position. A job function may be considered essential for any of several reasons, including but not limited to the following:

- The function may be essential because the reason the position exists is to perform that function;
- The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed; and/or
- The function may be highly specialized so that the incumbent in the position is hired for the individual’s expertise or ability to perform the particular function.

“Genetic Information” means with respect to any individual, information about the individual’s genetic tests, the genetic tests of family members of the individual, and the manifestations of a disease or disorder in family members of the individual, including family medical history, the fact that an individual or an individual’s family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

“Interactive Process” means the informal confidential dialogue between the University and the employee to identify reasonable accommodations.

“Interim Accommodation” means a temporary or short-term measure put in place until a permanent accommodation is determined.

“Qualified Employee with a Disability” means an individual who meets the requirements for the position and who can, with or without reasonable accommodation, perform the essential functions of the job in question.

“Reasonable Accommodation” means modifications or adjustments to a job-related activity, an employment practice, or the work environment that makes it possible for a qualified employee with a disability to perform essential job functions and to enjoy equal employment opportunities. A few examples of reasonable accommodations include:

- Making existing facilities used by employees readily accessible to and usable by persons with disabilities.
- Acquiring or modifying equipment or devices, adjusting or modifying examinations, training materials or policies, adjusting work schedules, and providing qualified readers or interpreters.

“Undue Hardship” means an action that would be unduly burdensome, or that would fundamentally alter the nature and structure of the operation or unit where the employee is currently working.

Policies

1. Requesting a Reasonable Accommodation

An employee or applicant who wishes to request a reasonable accommodation (or another person wishing to request a reasonable accommodation on behalf of an employee) can make the request either in writing or orally in the following ways:

Email: HR@Roosevelt.edu

Call: (312) 341-4334

Make a verbal request to a supervisor or HR representative.

It is strongly recommended that requests for accommodations be made as soon as possible to avoid delays in providing reasonable accommodations. Upon receipt of a request for a reasonable accommodation, Human Resources will contact the employee or applicant in writing.

The University will treat as confidential all requests for reasonable accommodations, related documentation (such as request confirmation receipts, requests for additional information, and decisions regarding accommodation requests), and all disability-related medical information provided to the University and will maintain such information in a file separate from the employee’s personnel file.

2. Documentation of Disability

The University may require that a request for a reasonable accommodation be supported by medical documentation. An employee or applicant’s health-care provider should advise the University about the requestor’s functional abilities and limitations in relation to their job functions. The employee has the

responsibility to request this information from the health care provider. The employee also has the responsibility to ensure that the health care provider provides this information to the university.

The Genetic Information Nondiscrimination Act of 2008 (GINA) generally prohibits employers from requesting or requiring genetic information of an employee or family member of the employee. Employees and health care providers should not provide the university any genetic information when responding to a request for medical information.

3. Determination of Disability

After a request for a reasonable accommodation is made, the University will make a determination of disability, which may include a review of medical documentation. If the employee's condition is determined not to be a disability (as defined by applicable law), the employee will be notified in writing that their request for reasonable accommodation is denied. If an applicant or employee disagrees with the determination of disability, the applicant or employee may appeal this determination in writing within 10 calendar days to the Office of the General Counsel by emailing LLaing@Roosevelt.edu. The General Counsel will consider the appeal and issue a final decision within 10 calendar days of receiving the appeal.

4. Interactive Process

When a determination of disability is made, the employee will be notified of the determination and the interactive process will begin. Human Resources in consultation with the employee and appropriate department personnel, will:

Discuss the purpose and essential functions of the employee's job. HR will request the Essential Functions from the employee's immediate supervisor and will request the employee's job description;

Determine the job-related limitations created by the employee's disability, including requesting and evaluating documentation from the employee's medical professional;

- Communicate the job limitations to the appropriate unit personnel in order to identify the potential accommodations and assess the effectiveness of each accommodation that may enable the employee to perform the essential functions of the job; and,
- Recommend the reasonable accommodation that is most appropriate for both the individual and the university and establish a timeline for evaluating the effectiveness of the accommodation, if appropriate. While the individual's preference will be considered, the University may choose a different reasonable accommodation.
- Once the reasonable accommodation document is completed and agreed to by all parties, the employing unit will implement the agreed accommodation.
- If at any time there is a question about the continuing nature of an employee's reasonable accommodation, or changes to the reasonable accommodation are necessary, the employee or the supervisor may contact the Human Resources to re-engage in the interactive process.

Exceptions

The University must make a reasonable accommodation for a qualified employee with a disability if it would not impose an “undue hardship” on the operation of the university’s business. The university is not required to lower quality or production standards to make an accommodation.

Entities Affected by this Policy

All Divisions of the University.

Related Documents

See RU Policy No. 2.1 (Policy Prohibiting Discrimination, Harassment, Bullying, and Retaliation); RU Policy No. 2.8 (Equal Employment Opportunity Policy). Please also reference any complaint resolution or other procedures implemented pursuant to this Policy.

Revision and Implementation

The Vice President of Human Resources shall have the authority to revise this Policy, subject to the approval of the President’s Executive Council.