



Homeland Security

Developing a Reasonable Accommodation Process

The following document discusses notice and basic elements of a process for receiving and responding to request for reasonable accommodations from program beneficiaries (e.g., program participants, clients, customers, or consumers, etc.). This document can assist recipients in developing a reasonable accommodation process for their own organization.

Section 504 of the Rehabilitation Act does not expressly require that recipients adopt a formal procedure for processing requests for reasonable accommodations, however, having a standard process can be instrumental to recipients in meeting their nondiscrimination obligations under the act.

Notifying Program Beneficiaries

Recipients should explain how they will notify clients, customers, program participants, or consumers of the recipient and any subrecipients of how to request reasonable accommodations.

Recipients should consider providing notice through a variety of means, for example, posting information on recipient webpage; placing posters in recipient facilities; incorporating the notice in program materials; or providing clients, customers, program participants, or consumers with a copy of the complaint procedures. The recipient should also consider its obligations to provide the notice in alternative formats and languages to ensure accessibility for persons with disabilities and persons with limited English proficiency.

Accepting and Responding to Requests for Reasonable Accommodations

Recipients should have a standard process for accepting and responding to request for reasonable accommodations from clients, customers, program participants, or consumers of its programs and activities. To be effective, recipients should consider including the following basic elements:

1. A designation of the recipients' employee or office responsible for coordinating reasonable accommodation requests and provision of contact information for submitting the request to that employee or office;
2. An explanation of the process for receipt and review of reasonable accommodations requests, including:
 - a. Notice to members of the public about requesting reasonable accommodations;
 - b. Any forms for program beneficiaries to request reasonable accommodations;
 - c. A description of the process for determining whether to provide a requested accommodation, including consulting with the individual requesting the accommodation in an interactive process to determine what, if any, accommodation the recipient should provide;
 - d. Timeframes for responding and/or providing reasonable accommodations; and
 - e. Provisions for providing interim accommodation if a requested accommodation cannot be provided immediately
3. Information on the recipients' resources for obtaining the reasonable accommodation to be provided, for example, how they will make arrangements for sign language interpreters.

4. Information on how the recipients will maintain the confidentiality of and appropriately secure any personally identifiable information (PII) in the request for reasonable accommodations to ensure that only those recipients' employees with a need to know have the information.
5. Information on how the recipients will provide the approved reasonable accommodation in future or ongoing interactions with the beneficiary.

Monitoring the Provision of Reasonable Accommodations

1. The recipients should have a record keeping system in place so they can monitor:
 - a. The number and type of requests for reasonable accommodations received in a designated period (e.g., annually);
 - b. The number of such requests that were denied and reason(s) for denial;
 - c. The number and type of alternate accommodations, if any, that were provided; and
 - d. A summary of circumstances regarding any denials based upon a determination of fundamental alteration or undue burden to recipients.

NOTE: DHS encourages recipients not to collect or retain records that contain personally identifiable information (PII). The purpose of the records is to track the recipients' reasonable accommodation practices. Any system of records should conform to recipients' existing requirements and guidelines on record-keeping.