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## HUMAN RESOURCES POLICIES AND PROCEDURES

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**Policy Name:** *Americans with Disabilities Act (ADA) as amended by the Americans with Disabilities Act Amendments Act (ADAAA)*

**Policy Purpose:** To standardize, define and communicate the policy and procedures for administering the ADA.

**Policy Statement:** It is the policy of Main Line Health (MLH) to abide by all provisions of the Americans with Disabilities Act and similar federal and/or state laws and regulations. We will not discriminate against any qualified individuals with disabilities.

**Procedure:** MLH is committed to providing reasonable accommodations for qualified individuals with known disabilities, including pregnancy-related disabilities. Based upon communication between the employee and Human Resources and information from the employee's medical provider, if necessary, MLH will determine whether a reasonable accommodation is appropriate. MLH's determination will depend on whether the employee has a disability, whether the employee needs a reasonable accommodation, and whether the accommodation poses an undue hardship for MLH.

Americans with Disabilities Act of 1990 (42 U.S.C. sec. 12101): The term "disability" means with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of an individual;
- A record of having such an impairment; or
- Being regarded as having such impairment.

All requests for reasonable accommodations should be in writing. Managers receiving verbal requests for accommodations will direct employees to submit their request in writing to Human Resources.

It is MLH's policy to maintain in confidence any medical information regarding an employee. Employees should not, therefore, inform their supervisor or any other employee as to the specific nature of their condition or any accommodation requests. Human Resources will determine who, if anyone, will be informed of the request for accommodation and what information, if any must be shared.

All medical information and the completed request will be kept by Human Resources as confidential medical records files, separate from personnel records.

If necessary to understand more fully an employee's condition and the requested accommodation, Human Resources may request additional medical documentation from the provider. MLH may also request that the employee submit to an independent medical examination from a doctor of its choosing, which will be paid for by MLH.

If the requested accommodation cannot be granted, Human Resources will meet with the employee in an effort to look for alternatives which satisfy the needs of the disabled employee and MLH.

**Origination Date:** August, 2009

**Revision Date:** October, 2014; February, 2012

**Review Date:** March, 2015; October, 2014; February, 2013; February, 2012; February, 2011; February, 2010