

An Employee Raises a Possible Accommodation What Happens Next?



A PRACTICAL CONVERSATION GUIDE FOR MANAGERS AND HR

An employee mentions a medical issue. Another asks for more time off. A manager hears, 'My doctor says I need to work from home.' None of them used the word accommodation, and they don't have to. A request can be made in plain language, and once it is, the employer's obligations may already be in play.

Managers don't need to be accommodation experts. They need to recognize when a request needs attention, involve the right people, and follow a consistent process.

PART 1: THE MANAGER'S ROLE

Recognize. Respond. Refer.

1

Recognize a possible request.

Listen when an employee connects a medical condition, pregnancy related limitation, or other health related restriction to a workplace difficulty or requested change.

Don't: Wait for a formal request, a specific phrase, or an ADA reference before involving HR.

2

Pause before responding.

A simple response can help:

"Thank you for telling me. Let's get HR involved so we can review what you need and the next steps."

Don't: Ask unnecessary questions about a diagnosis, promise an outcome, or dismiss the request.

3

Bring HR into the conversation.

Follow the company's reporting process promptly. Record when the employee raised the issue and what was communicated.

Don't: Try to resolve the request on your own, wait until it's convenient to pass it along, or share the employee's medical information with coworkers.

Manager takeaway: Recognize the possible request, respond professionally, and route it to the appropriate decision maker.

PART 2: HR'S ROLE

Evaluate. Document. Follow Through.

4

Identify the workplace limitation.

Identify the job duties or workplace conditions involved and review the employee's concerns.

5

Determine what information is needed.

Evaluate whether supporting documentation is appropriate under the applicable law. Avoid automatically requesting a diagnosis, complete medical records, or a doctor's note.

6

Explore possible accommodations.

Discuss the employee's requested change and other potentially effective options. Consider whether an interim measure is appropriate while the review continues.

7

Evaluate the operational impact.

Review the specific position, available resources, essential functions, and any potential undue hardship. A blanket policy or a manager's preference isn't enough on its own. Each request needs to be evaluated on its own facts.

8

Document the process.

Record conversations, dates, information requested, options considered, decisions, and follow-up. Keep confidential medical information separate from ordinary personnel records with appropriate access restrictions.

9

Communicate the decision.

Explain the outcome, any approved accommodation or alternative, and who is responsible for implementation. Confirm the decision in writing, and if the requested accommodation is denied, explain why and whether an alternative is available.

10

Follow up periodically.

Confirm the accommodation is still working, and reassess when the employee's limitations, job duties, or needs change.





Five Situations That Deserve a Closer Look

THE FACTS CHANGE. THE ANALYSIS OFTEN DOES TOO.



Medical Leave

Exhausting FMLA leave, or not being eligible for it, doesn't necessarily end the employer's obligations. Additional leave may still be required as an accommodation under the ADA or state law.



Remote Work

Consider essential job functions, actual work arrangements, and the employee's limitations when evaluating a remote work request.



Performance Problems

An accommodation request does not automatically eliminate existing performance expectations. Continue using consistent standards, accurate documentation, and appropriate HR involvement.



Pregnancy Related Limitations

Review applicable Pregnant Workers Fairness Act requirements before requesting medical documentation or rejecting a proposed workplace adjustment.



Outside HR or Leave Administrators

When a PEO or outside administrator is involved, confirm who receives requests, who evaluates them, who makes decisions, and how the employer is notified.



ONE QUESTION TO TAKE BACK TO YOUR TEAM

If an employee raised a possible accommodation with a manager tomorrow, would that manager know what to do next?

If the answer depends on which manager hears it, the process may be worth revisiting.

This guide is for general educational purposes only and does not constitute legal advice. It does not create an attorney-client relationship. Accommodation obligations depend on applicable law and individual circumstances.

