

The Employers' Reasonable Accommodation Handbook: What Can I Ask, and Why? Learner's Guide

Table of Contents

Overview	Page 2
Disability-Inclusive Culture	Pages 2-3
Disability-Related Questions	Pages 3-11
Self-Identification Campaign	Pages 11-12
Employee Resource Group	Pages 12-13
Conclusion	Page 13
Resources	Pages 13-17

Presented by:

Name: Dustin Schwab
Title: Career Development Specialist

Julie Zeigler Wood, OTR/L, ADAC
Worksite Accessibility Specialist
Occupational Therapist Registered/Licensed
ADA Coordinator

Office: 614-813-4649
Email: Dustin.Schwab@ood.ohio.gov
Website: www.ood.ohio.gov

Office: 614-205-5898
Email: Julie.Wood@ood.ohio.gov
Website: www.ood.ohio.gov

Overview

Opportunities for Ohioans with Disabilities (OOD) supports employers in creating workplaces that are diverse and inclusive of employees with disabilities. One way OOD does this is through providing consultations and training on Title I of the Americans with Disabilities Act (ADA), worksite accessibility, reasonable accommodations, and disability inclusion.

This learner's guide is a reference companion for the webinar titled "What Can I Ask, and Why" which is the sixth in the six-part series "The Employers' Reasonable Accommodation Handbook." This educational series will include an overview of various disability groups and address ways to provide effective reasonable accommodations and foster a disability inclusive culture. In this sixth session of the handbook, these topics will be summarized:

- Disability-Inclusive Culture,
- Disability-Related Questions,
- Self-Identification Campaign, and
- Employee Resource Group.

The information included is for educational purposes, is not an exhaustive list, and is not intended as legal advice.

Disability-Inclusive Culture

Work is important to people with and without disabilities. It can provide each of us with a sense of purpose, allow us to contribute to our individual and family finances, connect us socially with others, tie us to our communities, and be a source of pride. Working can be a productive use of time and enable individuals to participate in meaningful activity that contributes to their overall health and well-being.

People with disabilities report their biggest barrier to work is not their disability but the misconceptions others have about their abilities based on fears, myths, and stereotypes about disability. Statistics historically have shown an unemployment rate for individuals with disabilities more than double the rate for individuals without disabilities.

Employees with disabilities have skillsets as diverse as employees without disabilities and strengthen the workplace by offering a variety of perspectives for problem-solving, innovative thinking, and performing work. Employers who implement best practices for hiring and supporting employees with disabilities "consistently outperform their peers, including having, on average, 28 percent higher revenue, double the net income, and 30 percent higher economic profits." One reason may be attributed to employees with disabilities remaining on the job longer which reduces turnover costs. In addition, studies show employing individuals with disabilities leads to improved productivity, increased morale, and greater diversity in the workplace.

Many employers are striving to create inclusive workplaces where all employees feel welcome at work and appreciated for their unique contribution. Employers often ask how they can create an environment where all employees feel a sense of belonging and are comfortable to ask for what they need to be successful. The answer to that question is unique for each workplace however, OOD can support employers in these efforts with no-cost training, resources, and services which include:

- **The Inclusive Employer Handbook** – A five-part webinar series designed to help employers create and sustain a disability-inclusive workplace.
- **The Inclusive Employer Toolkit** – This toolkit provides information and resources to help employers recruit, hire and retain employees with disabilities and best practices to foster an inclusive workplace. All of OOD's employer resources can be found in one place!

- **Disability Awareness Training** – OOD’s Business Relations team can provide a variety of no-cost trainings to support employers in creating cultures inclusive of individuals with disabilities. Find the Business Relations Specialist that serves your region in the [Resources Section](#) of this learner’s guide. In addition, OOD offers an on-demand webinar titled “Disability Etiquette.”
- **Worksite Accessibility and Inclusion Consults** – OOD’s Worksite Accessibility Specialist provides no-cost consultations for employer partners to support their efforts to foster disability inclusive and accessible workplaces.

For more information on these OOD resources, see the OOD Resource box at the end of this section.

Employers also have asked what they can ask employees related to disability, when they can ask, and why. This training provides information to support disability inclusion in the workplace by addressing guidance and best practices for asking disability-related questions, establishing an employee resource group focused on disability, and administering a self-identification campaign.

OOD Resource:

The “**Inclusive Employer Handbook**” five-part webinar series is available on-demand on the employer’s page of the OOD [website](#).

The “**Inclusive Employer Toolkit**” is available on the employer’s page of the OOD [website](#).

The “**Disability Etiquette**” on-demand webinar is available on the employer’s page of the OOD [website](#).

Information about “**Worksite Accessibility Services**” is available on the employer’s page of the OOD [website](#).

Disability-Related Questions

To support a disability-inclusive workplace culture, it’s important for employers to know what disability-related questions and medical examinations are, when they can be administered, and why. Title I of the ADA limits when disability-related questions can be asked and when medical examinations can be administered during the pre-offer and post-offer phases of preemployment, as well as during employment.

A disability-related question is likely to elicit a response that discloses a disability. Here are examples from the Equal Employment Opportunity Commission (EEOC) guidance of disability-related questions:

- asking an employee whether they have or have had a disability,
- asking an employee how they acquired the disability,
- asking an employee about the nature or severity of the disability,
- asking an employee to provide medical documentation about the disability,
- asking an employee’s co-worker, family member, doctor, or another person about an employee’s disability,
- asking about the ability to perform major life activities like standing and lifting,
- asking about an employee’s genetic information,
- asking about an employee’s workers’ compensation history,
- asking an employee whether they currently take or have taken prescription drugs or medications, and

- asking an employee a broad question about their limitations that is likely to elicit a response about a disability.

The EEOC guidance indicates questions that are not likely to elicit a response about a disability are not disability-related inquiries and are not prohibited under Title I. Here are examples from the Equal Employment Opportunity Commission (EEOC) guidance of questions that generally are not disability-related:

- asking in general about an employee's well-being,
- asking an employee who looks tired or ill if they feel okay,
- asking an employee who is sneezing or coughing whether they have a cold or allergies,
- asking how an employee is doing following the death of a loved one or the end of a marriage/relationship,
- asking an employee about non-disability-related limitations such as asking how they broke their leg,
- asking an employee whether they can perform job tasks,
- asking an employee whether they have been drinking,
- asking an employee about their current illegal use of drugs,
- asking a pregnant employee how they are feeling or when the baby is due, and
- asking an employee to provide the name and telephone number of a person to contact in case of a medical emergency.

A medical examination is a test or procedure that seeks information about physical or mental health or conditions. Here are the factors the EEOC provides for employers to consider when determining whether a test or procedure is a medical examination

- Whether the test is administered by a health care professional,
- Whether the test is interpreted by a health care professional,
- Whether the test is designed to reveal an impairment or physical or mental health,
- Whether the test is invasive,
- Whether the test measures an employee's performance of a task or measures their physiological responses to performing the task,
- Whether the test normally is given in a medical setting, and
- Whether medical equipment is used.

Here are examples from the Equal Employment Opportunity Commission (EEOC) guidance of medical examinations:

- Vision tests conducted and analyzed by an ophthalmologist or optometrist,
- Blood, urine, and breath analyses to check for alcohol use,
- Blood, urine, saliva, and hair analyses to detect disease or genetic markers,
- Blood pressure screening and cholesterol testing,
- Nerve conduction tests such as tests that screen for possible nerve damage and susceptibility to injury, such as carpal tunnel syndrome,
- Range-of-motion tests that measure muscle strength and motor function,
- Pulmonary function tests,
- Psychological tests that are designed to identify a mental health condition or limitation, and
- Diagnostic procedures such as x-rays, computerized axial tomography (CAT) scans, and magnetic resonance imaging (MRI).

The EEOC guidance indicates there are tests and procedures employers may require that generally are not considered medical examinations. Here are examples from the Equal Employment Opportunity Commission (EEOC) guidance of tests and procedures that are generally not medical examinations:

- Tests to determine the current use of illegal substances,
- Physical agility tests which measure the ability to perform actual or simulated job tasks,
- Physical fitness tests which measure the performance of physical tasks, such as running or lifting, as long as these tests do not include examinations that could be considered medical, such as measuring heart rate or blood pressure,
- Tests that evaluate the ability to read labels or distinguish objects as part of a demonstration of the ability to perform actual job tasks, and
- Psychological tests that measure personality traits such as honesty, preferences, and habits.

Pre-Offer and Post-Offer Phases

In the pre-offer phase of preemployment, which is prior to making a conditional offer of employment, disability-related questions may not be asked, and medical exams may not be administered. This applies to application forms, interviews, testing, and background and reference checks. In addition, employers are not permitted to ask a third party any questions they are not permitted to directly ask the applicant. Examples of a third party include services that provide information about workers' compensation claims, a state agency, or an applicant's friends, family, or former employers.

In the pre-offer phase, an employer may do the following to evaluate an applicant's qualifications:

- Ask questions about the applicant's ability to perform job tasks if the question is not phrased in terms of a disability, for example:
 - An employer may describe the physical requirements of the job, such as maneuvering 25-pound boxes stacked on skids to a cart 36-inches high and ask the applicant if he/she can perform this task.
 - An employer may not ask an applicant questions about the ability to perform major life activities, such as standing and lifting because these may elicit a response about a disability.
- Ask questions about the applicant's ability to meet job requirements
- Ask about non-medical qualifications and skills, such as education, work history, certifications, and licenses
- Ask **ALL** applicants to describe or demonstrate how they would perform job tasks, with or without reasonable accommodation
 - This must apply to all applicants.
 - If the applicant requests an accommodation to demonstrate the job task, the employer must either provide an accommodation that is reasonable or permit the applicant to describe how he/she would perform the job task.

If an applicant has a known disability (an obvious disability or a disclosed disability) that the employer reasonably believes may interfere with or prevent the applicant from performing a job task, the applicant may be asked to describe or demonstrate how this job task would be performed, **even if other applicants are not asked to do so**. For example:

- If an applicant has one arm and a job task includes maneuvering bulky items onto shelves up to six-feet high, the employer could ask the applicant to describe or demonstrate how he/she would perform this function, with or without a reasonable accommodation.

- If the applicant states he/she could perform this function with the use of an accommodation, the employer must either provide this accommodation for the applicant to demonstrate this job task or allow the applicant to describe how he/she would perform this job task.

If an applicant has a known disability that would not reasonably interfere with performing a job task, the employer can only ask the applicant to describe and/or demonstrate how he/she would perform this task if **ALL** applicants are asked to do this.

Best Practices to Consider for Applications in the Pre-Offer Phase

- Review application forms and eliminate any questions related to disability
- Examples of questions that may NOT be asked on application forms (or in job interviews):
 - Have you received treatment for these conditions? (Followed by a list of conditions.)
 - Have you been hospitalized? If so, for what condition?
 - Have you been treated for a mental condition?
 - Is there a health-related reason you may not be able to perform the job?
 - How many days did you miss from work last year due to illness?
 - Do you have any physical conditions that limit performing certain tasks? Please describe.
 - Are you taking any prescription medicine?
 - Have you been treated for drug addiction or alcoholism?
 - Have you filed a workers' compensation claim?
- Examples of questions that MAY be asked on application forms (or in job interviews):
 - Are you able to meet the attendance requirements of the job?
 - Are you able to perform the essential job tasks, with or without an accommodation?
 - In the interview, if the applicant indicates the ability to perform tasks with an accommodation, the employer may ask the applicant how he/she would perform the tasks and with what accommodation(s).
 - Self-identification of disability is permitted under **Section 503 of the Rehabilitation Act** for Federal contractors and subcontractors.
 - A pre-employment inquiry about a disability also is permissible **if it is required or necessitated by another Federal law or regulation.**
- Include an accessibility statement on the application form that is easy to find.

Best Practices to Consider for Interviews

- Provide training for interviewers on:
 - Preemployment requirements of Title I of the ADA
 - Disability awareness and etiquette
 - Disability disclosure and confidentiality
 - The interactive process and how to manage reasonable accommodation requests
- Focus the interview on the applicant's ability to perform the job, not on disability.
- When an applicant has a known disability, questions the interviewer **MAY NOT** ask include:
 - What is the severity of the disability?
 - What condition caused the disability?
 - Will you need treatment or leave due to the disability?
- The interviewer may describe, demonstrate, or provide a written description of job tasks and ask if the applicant can perform these tasks with or without a reasonable accommodation.

- An employer may ask **ALL** applicants to describe or demonstrate how they will perform a job, with or without an accommodation.
- When an applicant has a known disability that could reasonably interfere with or prevent performance of a job-related task, the interviewer may ask the applicant to describe or demonstrate how this task would be performed, even if other applicants are not asked.
- However, if an applicant has a known disability that would not interfere with or prevent performance of a job task, the employer can only ask the applicant to demonstrate how he or she would perform the task if **ALL** applicants in the job category are also asked.
- Include an accessibility statement with information on how to request an accommodation in your communications inviting applicants to an interview.
- Consider common reasonable accommodations. (See Reasonable Accommodations section in this guide)

Best Practices to Consider for Non-Medical Testing

- Employers may administer tests to determine job qualifications.
- If a test screens out an applicant with a disability the decision must be job-related and consistent with business necessity.
- Tests given to applicants with disabilities should be in a format and manner that does not require use of a functional limitation, unless the test is designed to measure that skill.
- Inform applicants in advance of tests that will be given and include an accessibility statement so the applicant knows how to request an accommodation, if needed.
- Consider common reasonable accommodations.

Best Practices to Consider for Background and Reference Checks

- In the pre-offer phase, an employer may not request information about an applicant from another source that it is not permitted to request of the applicant. This includes asking about disability, illness, workers' compensation history.
- Examples of questions an employer may ask a previous employer about include:
 - Job functions and tasks performed
 - Quality and quantity of work output
 - Attendance record
 - Job-related issues that do not relate to disability
- Employers should ensure any outside agencies used to conduct background checks comply with ADA requirements regarding pre-employment inquiries.

In the post-offer phase of preemployment, which is once a formal job offer is made but before employment begins, an employer may ask disability-related questions and require medical exams if this applies to **ALL** candidates receiving a job offer in the same job category. A job offer is permitted to be conditioned based on the results of the questions and/or exams.

The reason why this pre- and post-offer process was established was to help ensure a candidate's disability is not considered before his/her ability to meet the job's qualifications standards and perform the job's essential functions are determined.

Disability-related questions and medical examinations related to the hiring process are covered in greater detail in OOD's on-demand webinar "**Inclusive Hiring: Applicants with Disabilities**" which is included in the OOD Resource box at the end of this section. For additional information about disability-related questions and medical examinations, consult

the “**Enforcement Guidance: Preemployment Disability-Related Questions and Medical Examinations**” on the EEOC [website](#).

Employment Phase

Once an applicant is hired and becomes an employee, the employer can no longer ask disability-related questions or require medical examinations, unless the employer can show these questions or exams are “job-related” and “consistent with business necessity.” This applies to all employees, not just employees with disabilities.

- **Job-related** means a qualification standard, test, performance measure, or selection criterion applies to a specific job, not a general class of jobs.
- **Consistent with business necessity** means a qualification standard, test, performance measure, or selection criterion applies to the essential functions of a specific job.

The best way to measure an employee’s ability to do a job is through performance of work tasks. When an employer has the need to question an employee’s ability to perform the essential functions of the job, or to do so without posing a direct threat to safety, it may be “job-related” and “consistent with business necessity” to ask disability-related questions or require a medical exam.

Guidance from the EEOC indicates a disability-related question or medical examination of an employee may generally fit this requirement of being “job-related” and “consistent with business necessity” when an employer “has a reasonable belief, based on objective evidence, that”:

- “An employee’s ability to perform essential job functions will be impaired by a medical condition,” and
- “An employee will pose a direct threat due to a medical condition.”

Disability-related inquiries and medical examinations may be “job-related” and “consistent with business necessity” during the interactive process to verify a disability or the need for a reasonable accommodation when these are not known or apparent. The guidance also indicates that in limited circumstances, employers are permitted to require medical examinations of all employees in certain positions, such as those that impact public safety, to address concerns specific to a particular job.

In these instances, it may be “job-related” and “consistent with business necessity” for the employer to ask disability-related questions or require medical examinations. Here are examples adapted from the EEOC guidance:

- A tax auditor has performed a third fewer audits over a two-month period than expected. She has also made several mistakes when assessing taxpayers’ deductions. During a low performance review, the employee discloses to her employer that she has lupus and recently started taking a new medication which makes her tired and causes difficulty with focusing on work tasks. Based on this disclosure, the employer has a reasonable belief that the employee’s ability to perform the job’s essential functions may be impaired by the medical condition. The employer may ask disability-related questions, such as how long the medication’s side effects are expected to last or ask the employee to provide documentation from her treating provider to explain the effects the medication may have on her ability to perform the job.
- A crane operator who works at a construction site is required to hoist concrete panels that weigh several tons. A coworker on the ground assists with loading the panels and several coworkers assist with positioning the panels. While on a break the operator appears to become light-headed, sits down abruptly, and seems to have difficulty catching his breath. The employer asks him if he is okay, and the employee responds that this has happened a few times over the past several months and he is unsure why. Based on this objective evidence, the employer

can reasonably believe the employee may pose a direct threat and require him to have a medical examination to determine if these symptoms impact his ability to safely perform the job. The employer may wish to provide a copy of the job's essential functions including the physical qualification standards to the employee to deliver to his treating provider to help the provider make this determination. The employer may require the employee to provide documentation of his ability to perform the job safely after completing the exam.

- A fire department requires those employees with the essential function of firefighting to undergo a comprehensive vision exam every two years and an electrocardiogram every year due to the department's concern that certain vision and heart problems can affect an employee's ability to perform the job without posing a direct threat. If the outcome of the examinations results in the employer determining a direct threat exists, reasonable accommodation must be considered.

The "job-related" and "consistent with business necessity" standard may be met when:

- The employer knows the employee has a disability, has observed low performance, and can reasonably attribute the low performance to the disability.
- The employer is provided reliable information from a third party who is credible about an employee's disability.
- The employer observes symptoms which indicate the employee may have a disability that will impair the ability to perform the job's essential functions or will pose a direct threat.

When an employer is provided information from another person about an employee's ability to perform the job's essential functions or that an employee poses a direct threat, they must consider specific factors to determine whether the information is sufficient to permit them to ask disability-related questions and administer medical examinations.

Here are the factors employers must consider provided in the EEOC guidance:

- The relationship of the person providing the information with the employee the information is about,
- The seriousness of the condition or disability of concern,
- The possible motivation the person providing the information may have,
- The way the person learned the information they are sharing, and
- Other evidence the employer has that impacts the reliability of the information given.

Here is an example adapted from the EEOC guidance:

- Several customers have reported to an employer that one of their customer service representatives has made several errors on their orders. There have been consistent complaints that the same representative asks them to repeat information about their order frequently and asks them to speak louder. The customers report that after repeating the information and enunciating clearly, the representative often reads back their information incorrectly. Based on this information, the employer has a reasonable belief based on objective evidence that the employee's ability to process orders correctly may be limited by a medical condition, such as difficulty with hearing. The employer may ask the employee disability-related questions or ask the employee to take a medical examination to determine if the employee can perform the job's essential functions.

Employers have asked what action they can take if an employee does not respond to a disability-related question or complete a medical exam that is job-related and consistent with business necessity. The EEOC guidance indicates the action the employer may take depends on the reason for asking the question or requiring the exam. If the reason is related to performing the job's essential functions and the employee does not respond, the employer is permitted to apply the consequences for low performance as they are applied to all employees with low performance in the same

job class. If the reason is related to verifying a non-apparent disability or need for a reasonable accommodation during the interactive process, the employer may choose to not approve the accommodation.

An employer may ask disability-related questions and administer medical exams when an employee is returning to work after taking leave for a medical condition if the employer has a reasonable belief that the employee's present ability to perform the job's essential functions will be limited by the medical condition or that the employee poses a direct threat because of the medical condition. The questions and exams must be limited to obtaining the necessary information to make the assessment and must not include unrelated questions or exams.

The EEOC guidance states an employer is permitted to ask disability-related questions and require medical examinations that are necessary and/or mandatory under another federal law or regulation. Here are examples from the guidance:

- Federal safety regulations require interstate bus and truck drivers to have medical examinations every two years and
- Airline pilots and flight attendants are required to continually meet specified medical requirements.

Additional federal laws with requirements for disability-related questions and medical examinations include the Occupational Safety and Health Act, the Federal Mine Health and Safety Act, and other federal statutes related to exposure to toxic and hazardous substances.

Some employers offer wellness programs as a benefit and privilege of employment. The program is considered voluntary when the employer does not require employees to participate and does not penalize employees who do not participate. The ADA does not prohibit employers from offering voluntary wellness programs that include providing voluntary medical histories and participating in voluntary medical examinations. These activities do not have to be job-related and consistent with business necessity. The ADA does require the employer to keep the information and medical records obtained through these voluntary programs confidential which includes being stored apart from general personnel files. Here are examples of what these programs often screen included from the guidance:

- Blood pressure screening,
- Cholesterol testing,
- Glaucoma testing, and
- Cancer screening.

Asking disability-related questions and administering medical examinations may result in an employee requesting a reasonable accommodation. When an employer receives a request, they are permitted to obtain reasonable documentation to verify a non-apparent disability or to establish the need for the accommodation when this is not known or obvious. Reasonable documentation is documentation that is sufficient in substantiating the disability and the need for the accommodation but does not include unrelated information. This generally means an employer cannot request an employee's entire medical record. The EEOC guidance indicates documentation is sufficient in verifying a disability and the need for reasonable accommodation when it:

- Describes the nature, severity, and duration of the limitation,
 - The activity or activities the disability limits, and
 - The extent to which the disability limits performance in work-related activity or activities.
- When it substantiates the need for the reasonable accommodation.

During an assessment of direct threat, employers are permitted to obtain the information necessary to make their determination. In most cases, employers cannot request the employee's complete medical records because this is likely to include information that is unrelated to whether the employee can work without posing a direct threat.

The ADA requires employers to follow confidentiality guidelines when they receive information related to disability. This information can come from asking disability-related questions, administering medical examinations, navigating the interactive process, receiving documentation, and receiving information voluntarily provided by the employee. The EEOC indicates medical information should be kept in separate medical files apart from general personnel files, whether stored in physical filing cabinets or in electronic databases. Here are some examples of circumstances when medical information may be shared with designated parties:

- Necessary information may be shared with employees responsible for facilitating reasonable accommodations when handling safety and emergency situations,
- Information specific to the proper implementation and use of a reasonable accommodation may be shared with designated supervisors, and
- Information requested for a compliance investigation or to assess an insurance claim, such as a workers' compensation claim, may be shared with designated parties.

Asking disability-related questions, when permitted, may result in a disclosure of a disability and a prompt engagement in the interactive process so the individual and the employer can collaborate to identify and implement an effective reasonable accommodation. For additional information about disability-related questions and medical examinations, consult the "**Enforcement Guidance on Disability-Related Inquiries and Medical Examinations of Employees Under the ADA**" on the EEOC [website](#).

OOD Resource:

For more information on best practices for the hiring process, view "**Inclusive Hiring: Applicants with Disabilities**" on the employer's page of the OOD [website](#).

Self-Identification Campaign

Some employers utilize self-identification campaigns to meet their obligations under federal, state, or local laws or regulations and/or to foster a disability-inclusive culture.

Employers who are federal contractors or subcontractors who meet certain criteria are required under Section 503 of the Rehabilitation Act to "aspire to, and track progress toward, employing individuals with disabilities." This includes inviting all applicants to self-identify as a person with a disability during the pre- and post-offer phases of preemployment and to invite all employees to self-identify as a person with a disability every five years. In addition, covered employers are required to track their progress toward attaining a workforce that includes at least seven percent of people with disabilities.

An invitation to self-identify as required by another federal, state, or local law or regulation does not conflict with the Title I of the ADA when certain guidelines are met. Employers may also invite individuals to voluntarily self-identify when the information is being used to benefit individuals with a disability. Here are the ADA guidelines covered employers must meet:

- Individuals who choose to not self-identify should not be penalized,

- Information collected should be stored separate from other personnel files,
- Information collected cannot be made available or used for employment decisions that could lead to an adverse impact such as with hiring or performance, and
- Specific language must be used in the invitation for individuals to self-identify.

Section 503 is enforced by the U.S. Office of Federal Contract Compliance Programs (OFCCP). OFCCP has a form for voluntary self-identification on their [website](#).

OOD Resource:

For information on creating an accessible workplace, review the “**Workplace Accessibility**” section of the Inclusive Employer Toolkit on the employer’s page of the OOD [website](#).

Employee Resource Group

Employers can foster a disability-inclusive workplace culture through establishing an employee resource group (ERG) focused on disability. An ERG is an internal group of employees from various levels of an organization who have a shared interest in the needs of a diverse group in the workplace. An ERG offers the opportunity to network with other employees, address the needs and concerns of this diverse group, find support from those with similar experiences, and effect change related to this diverse group regarding work-related activities and needs.

Here are examples of the actions Ohio employers report from their ERGs’ efforts:

- “The CapABLE ERG at Nationwide Children’s Hospital (NCH) provides support and advocacy for (1) employees with disabilities, (2) employees who are caregivers or partners of people with disabilities, and (3) employees who work with individuals with disabilities. CapABLE provides training to departments, such as Neurodiversity at Work, Inclusive Hiring, and Improving the Patient Experience. CapABLE partners with their executive sponsor and various departments to improve the access, acceptance and support for employees with disabilities. Additionally, the group is working on quality improvement initiatives related to accessibility and accommodations. CapABLE hosts quarterly membership meetings and offers to meet 1 on 1 with employees to provide support and information on navigating internal processes. The ERG is closely tied to the Project SEARCH program at NCH by supporting current and past interns. After Project SEARCH’s first year at NCH (2021-2022), NCH hired 80% of the interns. The CapABLE ERG is excited to continue supporting and improving Nationwide Children’s inclusion practices.”
- Key Bank’s Champions of Persons with Disabilities (CPD) employee resource group celebrated many successes in 2022. CPD supported Key Bank through partnering with external disability-focused organizations hosting hiring events for their Fraud Hotline and Service Center open positions. CPD offered a variety of training offerings such as Disability Etiquette for their talent acquisition team and a Mental Wellness series which addressed a range of topics such as anxiety, suicide prevention, on-the-job stress, insomnia, and dealing with domestic violence. CPD organized Mental Wellness Circles which are voluntary and recurring discussion groups led by a therapist and focused on mental health related topics, challenges, and solutions. In addition, CPD published its first newsletter in May and increased the ERG’s membership by 34%.
- Fifth Third Bank’s Individuals with Disabilities (IwD) Business Resource Group (BRG) pillars are employee development, community involvement, and business innovation. Highlights of their BRG’s 2022 accomplishments include celebrating National Disability Employment Awareness Month (NDEAM) with leaders across the bank to raise awareness of disability inclusion in the workplace, supporting a disability services

organization through volunteer work for the Over the Rhine (OTR) International Film Festival, and improving employees' access to the accommodation policy and process within their human resources (HR) technology platform.

Here are resources for employers with best practices for disability-related ERGs in the workplace:

- Disability:IN offers an **ERG/BRG Resources** toolkit on their [website](#) which addresses:
 - Disability inclusion across the entire employment life cycle,
 - Strategies to enable employees to bring their whole selves to work, and
 - Tools and websites with additional information.
- EARN offers an **Employee Resource Groups (ERGs)** resource on their [website](#) which provides:
 - An ERG toolkit via PDF that shares how to create and implement an ERG,
 - A PDF that describes ERGs and how to approach creating a disability-related ERG, and
 - A fact sheet via PDF of how to plan accessible ERG events.

OOD Resource:

For information on how OOD can assist with providing education and training, visit the “**Disability Education Resources**” page on the OOD [website](#).

Conclusion

OOD appreciates your interest in identifying solutions and resources to support a workplace that is diverse and inclusive of employees with disabilities. Each employee, each employer, and each workplace are unique and because of this, the effective strategy to create a work environment that is accessible and inclusive will be unique. We hope the information shared in this learner's guide and webinar is helpful in supporting your efforts.

Resources

Disability-Inclusive Culture

- Accenture. “[Getting to Equal: The Disability Inclusion Advantage](#)”
- American Occupational Therapy Association. “[What is the Role of Occupational Therapy in Supporting Employment of Young Adults with Disabilities?](#)”
- Employer Assistance and Resource Network on Disability Inclusion. “[Disability Inclusion in the Workplace: Why it Matters](#)”
- Employer Assistance and Resource Network on Disability Inclusion. “[Disability-Inclusive Workplace Culture: Building it to Last](#)”
- National Association of County Behavioral Health and Developmental Disabilities Directors. “[The importance of work for individuals with intellectual/developmental disabilities](#)”
- Northeast ADA Center. “[Small Business at Work Toolkit](#)”
- Opportunities for Ohioans with Disabilities. “[Disability Etiquette Training](#)”
- Opportunities for Ohioans with Disabilities. “[Inclusive Employer Handbook](#)”
- Opportunities for Ohioans with Disabilities. “[Inclusive Employer Toolkit](#)”
- Opportunities for Ohioans with Disabilities. “[Worksite Accessibility Services](#)”

Disability-Related Questions

- Job Accommodation Network. "[Technical Assistance Manual for Title I of the ADA](#)"
- Job Accommodation Network. "[The JAN Workplace Accommodation Toolkit](#)"
- Opportunities for Ohioans with Disabilities. "[Inclusive Hiring: Applicants with Disabilities](#)"
- U.S. Equal Employment Opportunity Commission. "[Enforcement Guidance on Disability-Related Inquiries and Medical Examinations of Employees Under the ADA](#)"
- U.S. Equal Employment Opportunity Commission. "[Enforcement Guidance: Preemployment Disability-Related Questions and Medical Examinations](#)"
- U.S. Equal Employment Opportunity Commission. "The ADA: A Primer for Small Business"

Self-Identification Campaign

- ADA National Network. "[Section 503 of the Rehabilitation Act Rules](#)"
- ADA National Network. "[The Americans with Disabilities Act Questions and Answers](#)"
- Disability:IN. "[Best Practices for Self Identification](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Communicating the Benefits of Self-Identification](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Engaging Employees to Measure Success: Innovative Approaches to Encouraging Self-Identification of Disability](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Inclusion in Action: PepsiCo's You Belong Here Campaign Drives Disability Inclusion](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Measure Success: Accountability & Self-Identification](#)"
- Job Accommodation Network. "[Affirmative Action and Disability: What can Employers Ask?](#)"
- Job Accommodation Network. "[Disability Disclosure](#)"
- PepsiCo. "[How 'You Belong Here' inspired a movement](#)"
- U.S. Department of Labor. "[Voluntary Self-Identification of Disability Form](#)"
- U.S. Equal Employment Opportunity Commission's "[Enforcement Guidance on Disability-Related Inquiries and Medical Examinations of Employees under the ADA](#)"
- U.S. Equal Employment Opportunity Commission's "[Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#)"

Employee Resource Group

- Disability:IN. "[ERG/BRG Resources](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Employee Resource Groups \(ERGs\)](#)"
- Employer Assistance and Resource Network on Disability Inclusion. "[Fostering Disability-Inclusive Workplaces Through Employee Resource Groups](#)"
- Opportunities for Ohioans with Disabilities. "[Disability Education Resources](#)"

OOD's Business Relations Team – see map on final two pages

- **Jon Hackathorn, Manager, Ohio Vocational Apprentice Program and State of Ohio Agencies**
 - **Phone:** 614-306-1744
 - **Email:** jon.hackathorn@ood.ohio.gov
- **Cynthia L. Crews, Business Relations Specialist in Southwest Ohio**
 - **Phone:** 513-309-5140
 - **Email:** cynthia.crews@ood.ohio.gov
 - **Counties served:** Adams, Brown, Butler, Champaign, Clark, Clermont, Clinton, Darke, Fayette, Greene, Hamilton, Highland, Logan, Madison, Miami, Montgomery, Preble, Shelby, Union, and Warren
 - **Career Development Specialist:** Dustin Schwab
 - **Colleges/Universities served:** Central State University, Miami University, University of Cincinnati, Wilberforce University, and Wright State University
- **Michael Hoag, Business Relations Specialist in Northeast Ohio**
 - **Phone:** 216-210-7584
 - **Email:** michael.hoag@ood.ohio.gov
 - **Counties served:** Ashtabula, Cuyahoga, Geauga, Lake, Medina, Portage, and Summit
 - **Career Development Specialist:** Kris Wray
 - **Colleges/Universities served:** Cuyahoga Community College, Kent State University, and The University of Akron
- **Julie Lasher, Business Relations Specialist in Southeast Ohio**
 - **Phone:** 380-239-0158
 - **Email:** julie.lasher@ood.ohio.gov
 - **Counties served:** Athens, Delaware, Fairfield, Franklin, Gallia, Hocking, Jackson, Lawrence, Meigs, Monroe, Morgan, Perry, Pickaway, Pike, Ross, Scioto, Vinton, and Washington
 - **Career Development Specialist:** Dustin Schwab
 - **Colleges/Universities served:** Columbus State Community College, Ohio University, and The Ohio State University
- **Ron Klonowski, Business Relations Specialist in East Central Ohio**
 - **Phone:** 330-312-4051
 - **Email:** ronald.klonowski@ood.ohio.gov
 - **Counties served:** Ashland, Belmont, Carroll, Columbiana, Coshocton, Crawford, Guernsey, Harrison, Holmes, Jefferson, Knox, Licking, Mahoning, Morrow, Muskingum, Noble, Richland, Stark, Trumbull, Tuscarawas, and Wayne
 - **Career Development Specialist:** Dustin Schwab, Kris Wray
 - **Colleges/Universities served:** Central Ohio Technical College, Stark State College, and Youngstown State University
- **Jacob Karnes, Business Relations Specialist in Northwest Ohio**
 - **Phone:** 419-277-5192
 - **Email:** jacob.karnes@ood.ohio.gov
 - **Counties served:** Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lorain, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca, Van Wert, Williams, Wood, and Wyandot
 - **Career Development Specialist:** Kris Wray
 - **Colleges/Universities served:** Bowling Green State University, Lorain County Community College, and The University of Toledo

Business Relations Specialists:

Northwest Area

Jacob Karnes

Jacob.Karnes@ood.ohio.gov
(419) 277-5192

Northeast Area

Mike Hoag

Michael.Hoag@ood.ohio.gov
(216) 210-7584

East Central Area

Ron Klonowski

Ron.Klonowski@ood.ohio.gov
(330) 312-4051

Southeast Area

Julie Lasher

Julie.Lasher@ood.ohio.gov
(380) 239-0158

Southwest Area

Cynthia Crews

Cynthia.Crews@ood.ohio.gov
(513) 309-5140

BUSINESS RELATIONS SERVICES MAP



Business Relations and Career Development Specialists Map

Business Relations Specialists (BRS) and Career Development Specialists (CDS):

Northeast Area

Michael Hoag - BRS

Kris Wray - CDS

- * Cuyahoga Community College
- * Kent State University
- * The University of Akron

Northwest Area

Jacob Karnes - BRS

Kris Wray - CDS

- * Bowling Green State University
- * Lorain County Community College
- * The University of Toledo

Southeast Area

Julie Lasher - BRS

Dustin Schwab - CDS

- * Columbus State Community College
- * Ohio University
- * The Ohio State University

Southwest Area

Cynthia Crews - BRS

Dustin Schwab - CDS

- * Central State University
- * Miami University
- * University of Cincinnati
- * Wilberforce University
- * Wright State University

East Central Area

Ronald Klonowski - BRS

Kris Wray - CDS

- * Stark State College
- * Youngstown State University

Dustin Schwab - CDS

- * Central Ohio Technical College



Colleges/ Universities

