

Return to the Workplace and COVID-19 Accommodations: Learner’s Guide

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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 creating disability-inclusive and accessible workplaces.

This learner's guide is a reference companion to a webinar which addresses some of the unique circumstances occurring with returning employees to the workplace during the COVID-19 pandemic.

This learner's guide provides information and best practices to assist employers with returning employees with disabilities to the workplace and will address these topics:

- Guidance
- Interactive Process
- Direct Threat
- Reasonable Accommodations

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

Guidance

Title I of the Americans with Disabilities Act (ADA) continues to apply to covered entities (employers) during the COVID-19 pandemic. However, the law does not interfere with employers following guidance and suggestions from the Centers for Disease Control and Prevention (CDC) and state and local public health authorities. Guidance and suggestions from these entities is updated as the pandemic evolves. Employers should follow the most current guidance for safety in the workplace.

Title I makes it unlawful to discriminate against individuals with disabilities in all aspects of employment. The purpose of Title I is twofold. First, it ensures individuals with disabilities have access to the same employment opportunities as all individuals. Secondly, it requires employers to provide reasonable accommodations to qualified applicants and employees with disabilities when needed, unless doing so causes an undue hardship.

Title I is regulated and enforced by the Equal Employment Opportunity Commission (EEOC). The EEOC has published guidance specific to the pandemic to assist employers in following their responsibilities under Title I. Content from this guidance informs the content of this learner's guide. For a full list of guidance used in this learner's guide, see the resources section in the final pages of this document.

Here are commonly referenced resources addressing employer responsibilities under Title I during a pandemic:

- "Coronavirus and COVID-19" on the EEOC [website](#).
- "Pandemic Preparedness in the Workplace and the Americans with Disabilities Act" on the EEOC [website](#).
- "What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws" on the EEOC [website](#).
- "COVID-19" on the CDC [website](#).
- "Coronavirus (COVID-19)" on the Ohio Department of Health [website](#).

- “Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace” on the Occupational Safety and Health Administration (OSHA) [website](#).
- “Coronavirus Disease 2019 (COVID-19)” on the Job Accommodation Network (JAN) [website](#).

These resources provide helpful guidance for employers on asking disability-related questions, navigating the hiring process, providing reasonable accommodations, and returning employees to work during a pandemic.

Interactive Process

Title I requires covered employers to provide reasonable accommodations to qualified applicants and employees with disabilities, unless doing so causes an undue hardship. A reasonable accommodation is a change in the hiring process or workplace that removes a barrier and enables an individual with a disability to access equal employment opportunities and participate in work-related activities.

Individuals with disabilities may request a reasonable accommodation at any point during the hiring process and employment. Often individuals with disabilities do not need accommodations to perform their jobs. A change in a disability or in the workplace may cause an individual with a disability to need an accommodation or to need an additional or a different accommodation.

Upon receiving a request, a covered employer is expected to act quickly and begin the interactive process to identify the need for the accommodation and an effective solution.

Navigating the interactive process during a pandemic is generally the same as when there is no pandemic. The steps include recognizing a request for an accommodation, obtaining the necessary information, and then identifying, implementing, and monitoring reasonable accommodations. The following information may help to address concerns employers have about the process when returning employees to the workplace at this point in the COVID-19 pandemic.

When an employer receives a request for a reasonable accommodation, the next step is to verify the disability exists and to identify the need for the accommodation. During the pandemic, employees have made requests for various reasons, such as being pregnant, being a caregiver of individuals with disabilities, and being older. For the ADA to apply, the individual making the request must be doing so based on their disability-related need. During the pandemic employers should identify who the request is for and why the accommodation is needed to determine whether the ADA or another federal law applies.

The U.S. Department of Justice (DOJ) and the U.S. Department of Health and Human Services (HHS) jointly published a guidance which states how “long COVID” can be a disability under the ADA. This guidance can be found on the DOJ [website](#). The EEOC addresses this in their guidance “What You Should Know About COVID-19 and the ADA...” on the EEOC [website](#).

The ADA does not have a list of conditions that automatically qualify as a disability. An individual with COVID-19 or its long-term effects may or may not have an impairment that rises to the level of disability according to the ADA. An employer can use the EEOC guidance to determine whether an individual qualifies as having a disability. When the disability and/or the need for the accommodation is not obvious, the employer is permitted to obtain medical documentation from an appropriate treating source.

OOD Resource:

For more information on the interactive process, view OOD's on-demand webinar "Navigating the Reasonable Accommodation Process" on the employer's page of the [website](#).

Direct Threat

An employer may have a concern that an employee poses a direct threat to his or her own health due to having a condition listed on the CDC's list of conditions that can increase their risk for severe illness if he or she contracts COVID-19. This list of conditions is available on the CDC's [website](#).

Title I of the ADA permits employers to create qualification standards that require individuals not pose a direct threat to health or safety. The ADA defines direct threat as "a significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation." This qualification standard must apply to all individuals in the same job class. Determining direct threat requires an individualized assessment based on criteria from the EEOC and reasonable accommodation must be considered to eliminate the direct threat or reduce it to an acceptable level.

When an employer knows an employee has a condition on the CDC's list and the employee has not requested a reasonable accommodation, the ADA does not mandate the employer take action. The employer is not permitted to take an adverse action against an employee who has a disability that the CDC states could potentially place the employee at risk if he or she contracts COVID-19. The employer may follow the EEOC criteria for determining whether a direct threat to the employee's own health exists. If this assessment results in a direct threat, the employer must consider whether a reasonable accommodation exists to eliminate or reduce the risk to an acceptable level so the employee can safely return to the workplace and perform the essential functions of the job.

The determination of direct threat must include an individualized assessment which must:

- Be based on a reasonable medical judgment about the employee's disability, and
- Use the most current medical knowledge and/or the best available objective evidence.
 - According to the EEOC, "guidance from CDC or other public health authorities is such evidence."

During this assessment the ADA requires employers to consider:

- Duration of risk,
- Nature and severity of potential harm,
- Likelihood potential harm will occur,
- Imminence of the potential harm,
- Severity of the pandemic in a particular area,
- Employee's health,
- Employee's essential job tasks,
- Likelihood the employee would be exposed to COVID-19, and
- Measures implemented by the employer to protect all workers.

When it is determined that a direct threat exists, the employer must consider whether a reasonable accommodation exists which will eliminate or reduce the risk to an acceptable level. Reasonable accommodation is determined on a case-by-case basis through the interactive process. Here are examples of accommodations to consider:

- Personal protective equipment, such as gloves and face coverings,
- Protective measures, such as creating a barrier or increased space between people,
- Job restructure to eliminate or swap less critical marginal duties of the job,
- Flexible work schedule, and
- Relocation of workstation or where work is performed.

If there is no reasonable accommodation that permits this, the employer must consider other types of reasonable accommodations, such as leave, telework, or reassignment.

Reassignment to a vacant position is considered the reasonable accommodation of “last resort.” Before this is considered, the employer should determine whether a reasonable accommodation exists to enable the employee to remain in his or her current position.

Often the employee and the employer will be successful in identifying an effective reasonable accommodation, but when this is not the case, there are resources to help. Here are some examples:

- With the employee’s permission, an employer may consider asking the employee’s medical provider for recommendations for accommodations or to comment on a specific accommodation being considered.
- The Job Accommodation Network (JAN) provides guidance on workplace accommodations and disability employment issues. Visit JAN to learn more: <https://askjan.org/>
- The ADA National Network provides guidance and training on how to implement the Americans with Disabilities Act (ADA). The network has ten regional ADA centers. Ohio is in the Great Lakes Region.
 - The ADA National Network website: <https://adata.org/national-network>
 - The Great Lakes Region website: <http://www.adagreatlakes.org/>

OOD Resource:

[Opportunities for Ohioans with Disabilities](#) is a state agency that provides Ohioans with disabilities the services and support they need to attain and maintain employment. Vocational Rehabilitation (VR) services are customized for each employee through assessments and one-on-one meetings with professional VR counselors.

Interested Ohioans with disabilities may visit www.oodworks.com or call us at 1-800-282-4536 to learn about VR services, take a self-assessment, create a profile, and apply.

Reasonable Accommodations

After receiving a request and verifying the disability and the need for a reasonable accommodation exists, the employer and the employee work collaboratively to identify an effective solution. This is determined on a case-by-case basis because each employee, job, and employer are unique. The

Following information provides examples of reasonable accommodations unique to the Return to the Workplace phase of the COVID-19 pandemic are organized by these categories: long-term effects, high-risk medical conditions, mental health disabilities, telework, and hybrid work environment.

Long-Term Effects

Employees who had COVID-19 previously may experience long-term effects such as brain fog, extreme fatigue, headaches, insomnia, joint pain and body aches, shortness of breath, and tachycardia. The Job Accommodation Network (JAN) offers accommodation ideas for these categories on their [website](#).

Brain Fog

Brain fog is a term used to describe symptoms which impact the ability to think. These symptoms can include confusion, disorganized thinking, difficulty putting thoughts into words, and decreased concentration. Here are general ideas for reasonable accommodations directly from JAN:

- Provide a quiet workspace
- Allow use of noise cancellation or white noise
- Provide uninterrupted work time
- Provide memory aids such as flowcharts and check lists
- Allow the use of apps for concentration, memory, and organization
- Allow rest breaks
- Restructure the job to remove marginal functions to allow focus on essential job duties

Extreme Fatigue

Extreme fatigue is severe fatigue which can impair the ability to perform daily functions. Here are general ideas for reasonable accommodations directly from JAN:

- Allow rest breaks
- Provide an ergonomic workstation
- Allow a flexible schedule
- Restructure the job to remove marginal job functions

Headaches

A headache is defined as pain in any region in the head and can include varying types and severities of pain. Here are general ideas for reasonable accommodations directly from JAN:

- Reduce workplace triggers, if any
- Provide alternative lighting
- Reduce glare
- Allow flexible scheduling

Insomnia

Insomnia is a sleep disorder that can impact the ability to fall asleep, stay asleep, or result in waking early and being unable to fall back to sleep. Here are general ideas for reasonable accommodations directly from JAN:

- Allow rest breaks to take quick naps

- Allow a flexible schedule
- Keep the workstation temperature on the cool side
- Allow cold drinks at the workstation

Joint Pain and Body Aches

Joint pain and body aches may occur in various areas of the body. Here are general ideas for reasonable accommodations directly from JAN:

- Allow rest breaks
- Reduce the physical demands of the job
- Provide an ergonomic workstation
- Allow a flexible schedule
- Restructure the job to remove marginal job functions

Shortness of Breath

Shortness of breath is described as “intense tightening in the chest, air hunger, difficulty breathing, breathlessness or a feeling of suffocation.” Shortness of breath can be due to a medical disorder. Here are general ideas for reasonable accommodations directly from JAN:

- Provide an alternative mask
- Allow removal of mask when appropriate
- Reduce physical exertion
- Allow rest breaks
- Reduce workplace triggers, if any
- Allow time for medical treatment such as use of a nebulizer or inhaler
- Restructure the job to remove marginal job functions
- Develop a plan of action to deal with sudden exacerbations

Tachycardia

Tachycardia is defined as a heart rate greater than 100 beats per minute. A variety of disorders can cause tachycardia. Here are general ideas for reasonable accommodations directly from JAN:

- Allow rest breaks
- Control the workstation temperature
- Provide an ergonomic workstation
- Allow drinks at the workstation
- Allow time off for treatment
- Develop a plan of action to deal with sudden exacerbations

One type of reasonable accommodation that may be effective for each of these long-term symptoms is telework. Best practices and guidance for considering telework as a reasonable accommodation will be discussed later in this learner’s guide.

High-Risk Medical Conditions

Employees who have a disability which put them at a greater potential risk if they contract COVID-19 may request a reasonable accommodation to eliminate possible exposure. Some accommodations may

have been implemented by employers for all employees. Here are general ideas for reasonable accommodations directly from the EEOC's guidance on its [website](#):

- Designating one-way aisles,
- Using plexiglass, tables, or other barriers to ensure minimum distances between customers and coworkers,
- Temporary job restructure of marginal job duties,
- Temporary transfers to a different position, and
- Modifying a work schedule or shift assignment.

Mental Health Disabilities

Some individuals with a preexisting mental health condition may have experienced an exacerbation of their condition during the COVID-19 pandemic and need a reasonable accommodation when one was not needed before. Or some individuals may have developed a new mental health condition and now need a reasonable accommodation at work. Employees with disabilities are permitted to request a reasonable accommodation at any point during employment and are not required to have needed one before the pandemic to request one during or after the pandemic.

Whether before, during, or after the pandemic, an employer should promptly begin the interactive process when a request is received for a reasonable accommodation. When a disability and/or the need for the reasonable accommodation are not obvious, the employer is permitted to ask questions and request medical documentation to verify the disability exists and/or verify the need for the reasonable accommodation.

Here is an example of a reasonable accommodation for an employee with a mental health disability:

- An employee with a panic disorder requests a private office when returning to the workplace due to a reported fear of contracting COVID-19 from interacting with colleagues.
- Through the collaborative interactive process, the employer decides to offer a temporary reasonable accommodation in the form of a private office.
- The employer provides a written agreement that the private office will be offered for four weeks and then the reasonable accommodation request will be evaluated for necessity and effectiveness.

Here are some examples of general reasonable accommodations which may be helpful for an employee with a mental health disability:

- Flexible schedule for medical appointments,
- Templates to assist with creating reports,
- Flow chart to assist with completing steps in a work task,
- Reminder apps on a Smart device for meeting deadlines, and
- Installation of partitions between workstations to minimize distractions and increase focus.

Telework

Some jobs can be performed in-part or completely through telework and others cannot. Some employees with disabilities may want or need to telework, and others may not. Due to the COVID-19 pandemic, new questions and concerns have arisen about the use of telework as a reasonable

accommodation. The EEOC indicates telework may be a form of reasonable accommodation and provides guidance for employers to consider. Here are two references to the EEOC guidance:

- “Work at Home/Telework as a Reasonable Accommodation” on the EEOC [website](#).
- “What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws” on the EEOC [website](#).

The following sections provide a summary of some of the EEOC [guidance](#) written prior to the pandemic.

Telework Policies

Employers are not required under Title I to establish telework policies. Employers who have telework policies must offer employees with disabilities an equal opportunity to participate in telework and may have to modify an existing policy as a form of reasonable accommodation.

Modifying an existing telework policy can include waiving eligibility requirements and making changes to the policy for an employee with a disability. Here is an example directly from the EEOC guidance:

- “If a new employee needs to work at home because of a disability, and the job can be performed at home, then an employer may have to waive its one-year rule for this individual.”

An employer is not required to have an established telework policy to permit an employee with a disability to work from home as a form of reasonable accommodation. However, an employer is permitted to select amongst effective reasonable accommodation options. This means although an employee with a disability may request to telework, if the employer is able to effectively accommodate the employee in the workplace in an alternative way, the employer does not have to grant the telework request.

Assessing Telework as a Reasonable Accommodation

Upon receiving a request for telework, the employer may need to assess the employee’s need to telework and whether the job can be performed at home.

Determining the employee’s disability-related need to telework occurs through the interactive process between the employer and the employee. During this process, the employer may ask questions to understand why the employee needs to work from home. The employee must explain the disability-related limitations that make performing the job’s essential functions in the workplace difficult and explain how he or she could perform these functions effectively at home. The employer is permitted to request reasonable documentation to verify the disability exists and the need for the reasonable accommodation when either or both are not obvious. The employer and employee may discuss other reasonable accommodations that would enable the employee to effectively perform the essential functions of the job in the workplace.

When discussing telework with the employee, the employer should also determine how frequently telework needs to occur. The answer to this will be determined on a case-by-case basis. For example, an employee with a disability may need to telework one day a week, twice a week for half a day, every day, as needed, and permanently or for a certain period.

Determining whether the job can be performed through telework begins with identifying and reviewing the job’s essential functions. The employer and employee will determine what essential functions can be

performed at home. Some jobs have essential functions that can only be performed at the workplace while other jobs have essential functions that can be performed at home. Here are examples from the EEOC guidance of factors employers should consider when making this determination:

- Supervision,
- Necessary equipment or tools,
- In-person interactions with coworkers,
- Coordination of work with coworkers,
- In-person interactions with customers and clients, and
- Immediate access needed for documents or information located in the workplace.

When considering these factors, employers should consider reasonable accommodations that enable the employee with a disability to perform an essential function effectively in another way. For example, the outcome of in-person interactions with coworkers may be effectively achieved using a video call, phone call, chat message, or email communications. When the employer determines some essential functions must be performed in the workplace, but others can be performed through telework, the employer and employee should determine whether working part-time in the workplace and part-time at home is effective in meeting the needs of both parties. For example, a job may require an employee to meet in-person with a client, but essential functions like writing reports can be performed effectively through telework.

Workplace Versus Telework

The EEOC guidance states the employer should consider the preference of the employee with a disability when choosing between effective reasonable accommodations but ultimately the employer is permitted to decide which accommodation to implement. Based on this guidance, an employer is permitted to choose a reasonable accommodation that is not the employee's preferred choice.

An employer may identify other types of reasonable accommodations which enable the employee to effectively perform the job in the workplace. Here is an example directly from the EEOC guidance:

- "...an employee with a disability who needs to use paratransit asks to work at home because the paratransit schedule does not permit the employee to arrive before 10:00 a.m., two hours after the normal starting time. An employer may allow the employee to begin his or her eight-hour shift at 10:00 a.m., rather than granting the request to work at home, if this would work with the paratransit schedule."

The following sections provide a summary of some of the pandemic-related EEOC [guidance](#) updated as needed during the pandemic.

Return to the Workplace and Telework

Many employers required employees to work from home during the COVID-19 pandemic and are recalling these employees back to the workplace. If an employee with a disability requests a reasonable accommodation to continue teleworking, the employer is not required to automatically grant this request. The employer should engage in the interactive process with the employee as it would with any request for a reasonable accommodation. The employer is permitted to know the employee has a disability and that a reasonable accommodation is needed. When this is not obvious, the employer may request reasonable documentation. The employer is permitted to choose amongst effective reasonable

accommodation options. The employer may choose to implement another form of reasonable accommodation that enables the employee to perform the job's essential functions in the workplace instead of permitting continued telework.

In some cases, employers who required employees to telework due to the COVID-19 pandemic chose to excuse certain essential functions during this time. Now that employers are returning employees to the workplace where all essential functions can be performed, then a request to telework as a form of reasonable accommodation does not have to be granted if doing so requires the employer to continue to excuse the employee from performing an essential function. Employers are not required under Title I to remove an essential function as a form of reasonable accommodation. The EEOC guidance states that when employers temporarily excused some essential functions when requiring or permitting telework due to COVID-19 it does not mean that:

- "...the employer permanently changed a job's essential functions,"
- "...telework is always a feasible accommodation," or
- "...it does not pose an undue hardship."

Making these determinations are based on the facts of the situation. The ADA does not prevent employers from restoring the job's essential duties when returning employees to the previous work environment.

Pre-Pandemic Versus Post-Pandemic Request for Telework

Prior to the COVID-19 pandemic, employers may have chosen to deny a request for telework as a reasonable accommodation because of concerns the essential functions could not be performed effectively remotely. As employers are returning employees to the workplace, new requests for telework should be evaluated with consideration of whether essential functions were able to be effectively performed remotely. In this situation, the period of teleworking serves as a trial which demonstrated whether essential functions could be performed effectively from a teleworking environment. The request for telework as a reasonable accommodation should be handled through the collaborative interactive process between the employer and the employee as any request for reasonable accommodation is handled.

Hybrid Work Environment

Some employers are providing employees a hybrid working environment in which employees will return to the workplace on designated days and telework the other days. Employers are reporting an increase in requests for a private office, a flexible schedule, to have equipment in both locations, and to telework full-time.

According to JAN, the EEOC has offered this information guidance:

- "Under the ADA, if an employer allows employees to work part time in the office and part time at home, the employer should consider providing accommodations in both places for employees with disabilities, unless doing so creates an undue hardship. The employer should be cautious about refusing to allow an employee to enjoy the hybrid work model as a way to avoid providing reasonable accommodations. An employer can explore the possibility of working in only one place – office or home – as part of the interactive process. But, the employer should be neutral

about it and not force the employee to work full time in one location to avoid having to potentially provide accommodations in two places.”

- “Also, the employer doesn’t necessarily need to provide the exact same accommodation in both locations and can explore whether less expensive options would be effective.”

Employers are required to provide reasonable accommodations for individuals with disabilities under Title I in three categories: to access the hiring process, to perform the job’s essential functions, and to enjoy the benefits and privileges of employment. When the hybrid working environment is considered a benefit and privilege of employment, employers are responsible to provide reasonable accommodations for employees with disabilities, when needed, to enjoy this benefit and privilege.

Here are some examples for providing reasonable accommodations in the hybrid environment:

- Provide a private office or relocate an employee’s workstation to a low traffic area;
- Permit a flexible schedule to enable an employee to work during hours when fewer people are in the environment; and
- Provide equipment, such as sit/stand workstations, that can be shared when employees alternate their days working in the office.

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 with a disability, each employer, and each workplace is 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 are helpful in supporting your efforts.

Resources

Guidance

- Centers for Disease Control and Prevention. [“COVID-19”](#)
- Job Accommodation Network. [“Coronavirus Disease 2019 \(COVID-19\)”](#)
- Ohio Department of Health. [“Coronavirus \(COVID-19\)”](#)
- U.S. Department of Labor’s Occupational Safety and Health Administration. [“Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace”](#)
- U.S. Equal Employment Opportunity Commission. [“Coronavirus and COVID-19”](#)
- U.S. Equal Employment Opportunity Commission. [“Pandemic Preparedness in the Workplace and the Americans with Disabilities Act”](#)
- U.S. Equal Employment Opportunity Commission. [“What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws”](#)

Interactive Process

- Job Accommodation Network. [“Accommodating Employees with COVID-19-Related Symptoms”](#)
- Job Accommodation Network. [“Engaging in the Interactive Process During the COVID-19 Pandemic”](#)

- U.S. Equal Employment Opportunity Commission. [“Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA”](#)
- U.S. Equal Employment Opportunity Commission. [“What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws”](#)

Direct Threat

- ADA National Network. [“Learn About the National Network”](#)
- Centers for Disease Control and Prevention. [“People with Certain Medical Conditions”](#)
- Great Lakes ADA Center. [“About Us”](#)
- Job Accommodation Network. [“About JAN”](#)
- Job Accommodation Network. [“Technical Assistance Manual for Title I of the ADA”](#)
- Opportunities for Ohioans with Disabilities. [“Vocational Rehabilitation”](#)
- Opportunities for Ohioans with Disabilities. [“Welcome to OOD Works”](#)
- U.S. Department of Justice. [“Long COVID and Disability Rights Under the ADA...”](#)
- U.S. Equal Employment Opportunity Commission. [“Enforcement Guidance on the ADA and Psychiatric Disabilities”](#)
- U.S. Equal Employment Opportunity Commission. [“What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws”](#)

Reasonable Accommodations

- Job Accommodation Network. [“Accommodating Employees with COVID-19-Related Symptoms”](#)
- Job Accommodation Network. [“Mental Health Conditions”](#)
- Mayo Clinic. [“Headache”](#)
- Mayo Clinic. [“Insomnia”](#)
- Mayo Clinic. [“Shortness of Breath”](#)
- Mayo Clinic. [“Tachycardia”](#)
- National Aging and Disability Transportation Center. [“Considerations in Reasonable Accommodations for Returning to Work”](#)
- News Medical Life Sciences. [“Severe fatigue common in COVID-19, independent of disease severity”](#)
- U.S. Equal Employment Opportunity Commission. [“Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA”](#)
- U.S. Equal Employment Opportunity Commission. [“What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws”](#)
- U.S. Equal Employment Opportunity Commission. [“Work at Home/Telework as a Reasonable Accommodation”](#)
- Web MD. [“Reasons You May Have Brain Fog”](#)

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

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Business Relations and Career Development Specialists Map

Business Relations and Career Development Specialists:

Northeast Area

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 * Kent State University
 * The University of Akron

Northwest Area

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

Southeast Area

Kelly Jordan - 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

