

BTAC

BULLETIN

BEHAVIORAL SCIENCE | LAW ENFORCEMENT & COUNTERINTELLIGENCE | CYBERSECURITY | EMPLOYEE MANAGEMENT RELATIONS | THREAT ASSESSMENT & MANAGEMENT

REASONABLE ACCOMMODATIONS

ADAPTIVE ORGANIZATIONAL RESPONSES & REDUCING INSIDER RISK

With a significant number of Return to Office (RTO) initiatives underway, many government agencies are seeing an influx of reasonable accommodation (RA) requests - some agencies reporting as much as a four-times increase over the normal rate. RAs are designed to support qualified employees with disabilities to successfully achieve the duties of the position<sup>1</sup>. However, if not managed properly, accommodations can inadvertently contribute to insider risks by fostering perceptions of favoritism, resentment, or distrust among colleagues. When employees feel the RA process is unfairly distributed or their own needs are overlooked, it can lead to disengagement, workplace tension, disgruntlement, anger, and other security concerns. On the other hand, when handled with transparency/fairness, and an individual's confidentiality is protected, accommodations can strengthen organizational trust, morale, and overall security.

WHAT REASONABLE ACCOMMODATION <i>IS</i>	WHAT REASONABLE ACCOMMODATION <i>IS NOT</i>
<p>A modification or adjustment to a job, the work environment, or the way things are usually done during the hiring process that enable an individual with a disability to have comparable opportunities to:</p> <ol style="list-style-type: none"><li>1. Apply for and get a job</li><li>2. Successfully perform their job tasks</li><li>3. Enjoy comparable benefits and privileges of employment</li></ol>	<p>There are many misunderstandings or myths about RA's.</p> <ol style="list-style-type: none"><li>1. RA does not provide justification for reduced performance or product quality.</li><li>2. Lowered performance expectations are not considered RAs.</li><li>3. A proposed accommodation that presents an undue hardship, difficulty, or is expensive to implement, is not "reasonable" and therefore not required of an employer.<sup>2</sup></li></ol>

The process by which reasonable accommodations are decided, communicated, and applied in the workplace can either decrease risk or increase risk. Below are some potential risks in the RA process, ways in which these risks may impact employees, and leadership recommendations for adaptive risk-reduction approaches.

ASSOCIATED RISKS	GRIEVANCE-ORIENTED EMPLOYEE RESPONSES	ADAPTIVE RISK-REDUCTION APPROACH
<p><b>Foregone Conclusions:</b> Organizational culture indicates that employees should not pursue RAs.</p>	<p>Employees don't trust the organization to have their best interest in mind.</p>	<p>Provide clear RA training about what is and what is not considered "reasonable" for your organization; promptly and compassionately respond to RA requests.</p>
<p><b>Supervisory Retaliation:</b> Employer takes adverse action or treats employees differently because of RA.</p>	<p>Employees feel targeted because of disability.</p>	<p>Maintain consistent performance standards and expectations.</p>
<p><b>Denial:</b> Employer ignores or denies RA request.</p>	<p>Employees feels unheard or not valued.</p>	<p>Work closely with employees; listen; provide detailed written justification for all RA decisions; be transparent.</p>
<p><b>Business Needs Change<sup>3</sup>:</b> Newly identified hardships, changes to organizational needs, or policy shifts require modification of existing RA.</p>	<p>Employees perceives lack of commitment or support for the RA by the organization.</p>	<p>Apply new performance or operational requirements fairly to all employees and provide written justification for modified RAs.</p>
<p><b>Perceived Favoritism:</b> Coworkers perceive individual with RA as receiving preferential treatment.</p>	<p>Coworkers feel undervalued and begin to have resentment toward employees with RA; rumors begin; distrust in leadership develops.</p>	<p>Managers can work to develop organizational climates where employees trust leaders to make sound and fair decisions using standard decision processes.</p>