

**BLOG: Accommodation Strategies for Returning to Work During the COVID-19 Pandemic**

<https://askjan.org/blogs/jan/2020/08/accommodation-strategies-for-returning-to-work-during-the-covid-19-pandemic.cfm?utm_source=govdelivery&utm_medium=email&utm_campaign=ODEP_Business_Sense_8-2020>

In order to keep businesses operating in a COVID-19 pandemic world, employers and employees are finding innovative, creative, and productive ways to continue to do work. Many employers are abandoning a conventional perspective on where, when, and how work is performed and are adopting flexible policies and practices to accomplish business objectives. This means that more workers than ever before are functioning in remote and virtual ways and are using unfamiliar technology and resources outside of the traditional work environment to *get the job done*.

People in various industries across the country have stepped up to the challenge and are performing job duties in new ways during this pandemic situation. But, workers with disabilities have always been thinking outside the box for creative solutions to performing their jobs, sometimes with reasonable accommodations. A reasonable accommodation is a modification or adjustment to a job, the work environment, or the way things usually are done that enables an individual with a disability to perform essential job duties. These kinds of modifications are implemented under the Americans with Disabilities Act (ADA) when disability-related limitations impact work. Like many of the adjustments that are being made by businesses in response to COVID-19 (e.g., work at home), accommodations keep qualified workers with disabilities on-the-job or enable them to return to work after a medical leave of absence.

With the reopening of America, businesses need strategies for returning individuals with disabilities to work during the COVID-19 pandemic. JAN is receiving many requests for accommodation solutions to enable workers who have impairments that put them at [higher risk for developing complications from COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html)to either safely return to the work environment, to work at home, or to access leave. Generally, employers are seeking strategies to limit the risk of exposure to COVID-19 in the workplace. Work environments, types of jobs, and risks of exposure vary greatly.

Of course, as businesses reopen, employers should follow the evolving COVID-19 guidance from the Centers for Disease Control and Prevention (CDC) and from state and local public health authorities regarding resuming business operations, returning employees to work, and workplace safety. The CDC offers extensive [worker safety and support guidance for workers in various industries, jobs, and environments](https://www.cdc.gov/coronavirus/2019-ncov/community/worker-safety-support/index.html). This information will be useful when exploring accommodation solutions for workers with disabilities as it offers infection control strategies specific to a broad range of industries, including: [manufacturing](https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-manufacturing-workers-employers.html), [banking](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/bank-employers.html), [mail and parcel delivery](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/mail-parcel-drivers.html), [transit operations](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/bus-transit-operator.html), [construction](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/construction-workers.html), [grocery and food retail workers](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/grocery-food-retail-workers.html), [higher education](https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html), and many more. These strategies might enable workers with disabilities to return to work when the risk of exposure to COVID-19 is a disability-related issue.

JAN offers the following general strategies for accommodating employees with disabilities to return to work during the COVID-19 pandemic, but in some cases, it will be necessary to analyze the individual circumstances to provide customized reasonable accommodation solutions. For assistance, please [contact JAN](https://askjan.org/contact-us.cfm) to explore situations and solutions.

**General Solutions for Limiting the Risk of Exposure to COVID-19**

* Post information from the CDC regarding [steps that can be taken to protect against the spread of COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html)in the workplace. The CDC offers a [Returning to Work Infographic](https://askjan.org/blogs/jan/2020/08/www.cdc.govcoronavirus%2C9-ncovcommunityesuming-business-toolkit.html#keep-safe) that can be used to remind employees how to protect themselves from COVID-19.
* [Require employees to stay home](https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws) if they are sick or exhibiting symptoms of illness and apply attendance and leave policies that are flexible.
* Request, provide, and/or allow employees to wear a [mask](https://askjan.org/solutions/Masks-General-Chemical-Allergen.cfm), [face covering](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html), and/or [face shield](https://askjan.org/solutions/Masks-Face-Shield.cfm) to limit the risk of exposure to COVID-19. A face shield alone may not be an adequate substitute for a cloth face covering. Educate employees on the [proper use, removal, and washing of cloth face coverings](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html).
* Provide other types of [personal protective equipment (PPE)](https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html) (e.g., gloves, gowns, etc.), if needed to safely perform job duties.
* Limit the need to touch communal surfaces; offer [automatic door openers](https://askjan.org/solutions/Automatic-Door-Openers.cfm), [hands-free/foot pull door openers](https://askjan.org/solutions/Hands-free-Foot-Pull-Door-Openers.cfm), [touchless tools](https://askjan.org/solutions/Touchless-Tools.cfm), [touchless faucets](https://askjan.org/solutions/Touchless-Faucets.cfm), touchless waste receptacles, etc.
* Post signs reminding employees to [wash their hands](https://www.cdc.gov/handwashing/when-how-handwashing.html) or use [hand sanitizer](https://www.cdc.gov/handwashing/show-me-the-science-hand-sanitizer.html) when soap and water cannot be used.
* Clean and disinfect public spaces frequently. Provide [cleaning and disinfecting](https://www.cdc.gov/coronavirus/2019-ncov/community/clean-disinfect/index.html) products and require workers to wipe-down high-touch surfaces and shared workstations after each use.
* Work with building maintenance to provide [effective ventilation](https://www.cdc.gov/coronavirus/2019-ncov/community/office-buildings.html) for reducing the airborne concentration of COVID-19 and the risk of transmission.

**Solutions to Address Physical Distancing Needs**

* Establish physical distancing policies and practices and use [physical/social distancing signage](https://askjan.org/solutions/Physical-Social-Distancing-Signage.cfm) to remind employees to stay at least six feet apart, when possible.
* Mark floors and public spaces with [textured tape](https://askjan.org/solutions/Stair-Tread-Tape.cfm), [highly visible tape](https://askjan.org/solutions/High-Contrast-High-Visibility-Paint-and-Tape.cfm), flow arrows, etc., to create single direction paths of travel and limited/no access areas.
* Stagger or space-out workstations to increase distance between workers and allow workers who have a private workspace to close the door.
* Install a [protective panel/shield](https://askjan.org/solutions/Protective-Panels-Shields-Germ-Guards.cfm), curtain, or other physical barrier (e.g., table) between workstations to separate employees and customers where physical distancing is not possible.
* Limit the number of people permitted in communal spaces (e.g., meeting and break rooms).
* Modify schedules to limit the density of people in the workplace (e.g., stagger or rotate shifts, days on and off, and breaks, allow alternating telework days, etc.) and/or allow alternative and flexible work hours to limit interaction with others.
* Modify a policy concerning where and when work is performed to allow [telework](https://askjan.org/topics/telework.cfm), flexible work arrangements, alternative work locations, etc.
* Modify a work schedule or allow telework to address COVID-19-related limitations in commuting to and from work (e.g., risk of exposure during commute or limited access to transportation).
* Restructure job duties to eliminate or reduce the frequency of the need to perform tasks requiring a mask and/or face-to-face contact with others.

**Solutions to Address Communication Needs**

* Allow communication among employees, and/or with customers/clients, etc., using remote methods (e.g., phone, text, real time chat, video, email, etc.).
* Conduct group meetings and events using remote and virtual formats (e.g., conference call or virtual meeting platform); limit the number of people in attendance for face-to-face meetings and training; hold face-to-face meetings and training in open, well-ventilated spaces, in conjunction with physical distancing and masks; or conduct group gatherings in outside spaces where people can be physically distanced.
* Use an [accessible virtual meeting platform](https://askjan.org/solutions/Accessible-Virtual-Meeting-Platform-Resources.cfm) for group meetings and collaboration.
* Modify training methods to include remote, online, limited face-to-face, hybrid, and flexible formats.
* When masks are worn in the workplace, consider the communication needs of workers who read lips. It may be necessary for co-workers to use a [clear mask](https://askjan.org/solutions/Masks-Clear.cfm), or [face shield](https://askjan.org/solutions/Masks-Face-Shield.cfm), to [video chat](https://askjan.org/solutions/Video-Phone-Equipment.cfm) from a different room without a mask, or to use other methods of communicating by text (e.g., texting, [portable text communication device](https://askjan.org/solutions/Portable-Text-Communication-Devices.cfm)).

If the changes laid out above cannot sufficiently limit the risk of exposure to COVID-19 in the workplace, and if allowing employees to work at home creates an undue hardship for the employer, consider providing access to [leave](https://askjan.org/topics/leave.cfm) under applicable federal, state, and local requirements and employer leave policies. For example, some workers will qualify for leave under the [federal ADA](https://www.eeoc.gov/laws/guidance/employer-provided-leave-and-americans-disabilities-act) and/or the [Families First Coronavirus Response Act (FFCRA)](https://www.dol.gov/agencies/whd/pandemic).

Everyone is working together in unprecedented ways to reopen America. Reasonable accommodation strategies can enable workers with disabilities to get back to work and can also benefit workers without disabilities who have concerns about working in a pandemic situation. To learn more about reasonable accommodation and the ADA, [contact JAN](https://askjan.org/contact-us.cfm).