

Reasonable Accommodations

Virtual Conference for Supervisors

Recorded March 7, 2017

We will get started and welcome everyone, this is Katherine Callaway and Brigitte Keels in Learning and Development. We'd like to welcome you to our Reasonable Accommodation session with Cleveland Williams. Please remember to [Indiscernible] and you may press *6 to mute and unmute your lines and send us a chat now in the Chat Box to say hello and let us know you're there and make sure we get attendance taken accurately. And if you have people in the group with you please type out their names and we can be sure to give them credit. An additional reminder the session is being recorded. And I will pass it over to Cleveland.

All right. Good afternoon, everyone. My name is Cleveland Williams [Indiscernible] the EEO program and I will be spending a few minutes with you giving information about reasonable accommodation and reasonable accommodation procedures. I will also be joined by Mr. Dave Davies, who will share information with you about the newly created Regional Reasonable Accommodation Portal and explaining rules and responsibilities of supervisors for utilizing that portal to capture all of the reasonable accommodations for the National Park Service.

Let's proceed with the agenda. We will talk about the laws, and Department of Interior has reasonable accommodation procedures and Dave Davies will pull me in to talk about National Park Service specifics. We'll talk about accommodations, medical documentation [Indiscernible] interactive process and describe the NPS portal and [Indiscernible]. Some background information [Indiscernible] Some of the time as it relates to reasonable accommodations, the Americans with Disability Act Title I covers employment. The Rehabilitation Act applies to ADA to the federal service and Executive Order 13163 has increased number of persons with disabilities within the federal work force. Executive Order 13164 mandates agencies to create written procedures for providing reasonable accommodation to qualified employees and applicants for employment. In other words, what is the purpose of the ADA? What does that acronym ADA stand for?

Type your answer the Chat Box.

That was enacted in 2008. Thank you for your response. And under the ADAAA made life activities to include bodily functions. The statute contains an exhaustive list of major life activities that as [Indiscernible] currently listed in the ADA Section 508-3. So specifically [Indiscernible] provides two major things: major life activities, which includes but are not limited to [Indiscernible], performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, [Indiscernible], learning, creating, concentrating, thinking, communicating and working. That's under major life activities. The other main area that the

ADAAA provides is for major bodily functions, which include but are not limited to functions of the immune system, normal cell growth, digestive, [Indiscernible], bladder, biological, brain respiratory, circulatory and reproductive functions. So, that is what the Americans with Disability Act of 2008's primary purpose.

Where is reasonable accommodation applicable to? What areas do you think is applicable to reasonable accommodation? What areas of employment [Indiscernible] reasonable accommodation is for? Put in the chat what areas.

Someone is typing federal employment [Indiscernible] hiring training. This slide shows recruitment, training, promotion, reassignment, developmental assignments. The ADA requires employers to provide reasonable accommodations so that employees with disabilities can enjoy the benefits and privileges of employment equal to those enjoyed by similarly situated employees without disabilities. So these are some of the areas that ADA is applicable to. Very good and thank you for your response.

What's a reasonable accommodation? Because it appears to be [Indiscernible] I have some very well-trained employees on the line for what is a reasonable accommodation. Please put in the Chat Box your answer

[Indiscernible] can be modified for space, purchase a larger screen for someone with difficulty seeing, allowing adjustment to normal applications to accommodate [Indiscernible - Background noise] Any change or adjustment to a job. [Indiscernible] employee or applicant disabled. How do we determine that determination?

So, to be regarded as disabled, an individual must have what? Type your answer the Chat Box.

To be regarded as disabled an individual must have what?

Great crowd. Documentation, medical verification, self-determination.

Let me give it to you here so you can have it. To be regarded as having an impairment, it's predicated on the attitude or treatment by the employee by a [Indiscernible] physical or mental impairment. The statute limits one or more life except [Indiscernible] which we cover in this slide. They must have a record of physical or mental impairment or history of being regarded as and regarded as by the agency, having such an impairment to be regarded as a qualified individual. Now we will step further [Indiscernible] regarded as a qualified individual with a disability [Indiscernible] must have the requisite skill, experience, education [Indiscernible] to claim the requirements of the position, and be able to perform essential functions of the position with or without reasonable accommodation.

Let's cover some terminology that's used as it relates to reasonable accommodation. Assistive technology – a device, any type of equipment, whether acquired commercially, modified or customized that is used to increase, maintain or improve functional capability of individuals

with disabilities. Most assistive technology can be had through the Department of Defense computer electronic accommodation program also known as CAT [Indiscernible] and electronic and information technology a statutory terms set forth in Section 508 of the Rehab Act of 1973. This includes information technology and any equipment or interconnected system or subsystem of equipment that is using creation, conversion or duplication of data information. [Indiscernible] therefore, the electronic and information technology.

What would you think might be a situation where that arises? Think about all the stuff that you see before you, like training videos, which they have on them, what should they be. Two words I'm looking for, both start with C.

Polls say Closed Captioning. Awesome group.

Now let me talk about essential functions as the defined by the Department of Labor and EEOC. It pertains to job duties that are so fundamental to the position that the individual cannot do the job without being able to perform them. A function is essential if, among other things, the position exists specifically to perform that function. There's limited numbers of other employees who could perform the function. If it was [Indiscernible] or the function is specialized and the incumbent was hired based on his or her ability to perform it. This is critical determination of the essential function of a position and must be done on a case-by-case basis so that it reflects a job as actually performed and not simply to component of a generic position description. And that is important when you start dealing with providing reasonable accommodations that you really reach out to Dave Davies and employee labor relations and your regional accommodation [Indiscernible] so you get the best information, so you can make a more well-informed decision to extenuating circuit circumstances. These are factors that could not reasonably have been anticipated or avoided in relation to the request for reasonable accommodation [Indiscernible] and we have participating in the training.

Does anyone know what the acronym REC stands for? Put in the chat line [Indiscernible]

Reasonable Accommodation Coordinator would be right.

We'll cover briefly reassignment reasonable accommodation absent undue hardship as provided to employees [Indiscernible] to be covered the disability can no longer perform the essential function of their job with or without reasonable accommodation. Reassignments are only made to vacant positions and to employees who are qualified for the new position. If the employee is qualified for the position, your employee will be reassigned to the job and will not have to compete for it. This is a very tricky area, and I advise and strongly encourage each and every one of you if you're involved in a type of reassignment as it relates to reasonable accommodation that you continue to reach out to Employee Labor Relations and your solicitor and [Indiscernible] you can get good advice from before you make a final determination, because there's been quite a few EEO complaints regarding reassignment as it relates to reasonable accommodation and advice I share with you as it relates to reassignment and targeted disability.

Can anyone tell me what is a targeted disability? What are targeted disabilities? Answering the chat line. Targeted disabilities [Indiscernible] answer in the chat line.

I would give you this definition that the way that EEOC, which is the Equal Employment Opportunity Commission, defines targeted disabilities. Some people type [Indiscernible - Background noise] Impairment [Indiscernible] recruiting. Carla said [Indiscernible - Background noise] thanks for feedback. And it's a definition as defined by EEOC, Equal Employment Opportunity Commission. Targeted disabilities are certain disabilities that have been defined as warranting particular attention in federal employment action planning. They include the following: deafness, blindness, missing extremities, partial paralysis, complete paralysis, compulsive disorder, mental retardation, mental illness, and distortion of the limbs and/or spine. It is recognized that some disabilities that are not on the targeted list are nonetheless just as severe, and sometimes more so than those on the targeted list. So, this list is affirmed by the EEOC and is not about the severity of the disability. A lot of it is related to these have been identified as a very low representation in the federal government. We have a very, very small number of employees with these type of disabilities, and therefore they rose to the level of being targeted, so we can increase the number of employees with these type of disabilities and the federal government and talk about undue hardship.

What is undue hardship?

I know you have doubtless some request out there and conclusion of undue hardships provided. How do you define undue hardship? What is an undue hardship? Talk to me and put in the chat line.

Overly costly equipment or retrofitting. Carla said accommodating equipment places significant [Indiscernible] expense on the employer.

It's a specific accommodation that involve significant difficulty or expense which to individuals spoke to earlier this determination must be made on a case-by-case basis. Consider factors such as [Indiscernible] of accommodation needed [Indiscernible] of the budget or organization. That is key. Organization, and the EEOC talks about organization as not your park or your Region. When the Equal Employment Opportunity Commission talks about organization, they are talking about the budget of the National Park Service or the employment positions, number of employment positions with the National Park Service. You keep that in mind when you're dealing with it. It is not your particular area; it is the National Park Service and the impact of the accommodation on the operations of the agency [Indiscernible] vacant position pretty much self-explanatory. A position is considered vacant if the employee or posted a notice on announcement seeking application for that position.

All right we get to the good stuff now. Who can make a request? Who can make a request for RAC?

Employee or [Indiscernible] individual disability -- [Indiscernible - Multiple speakers]

[Indiscernible] give you additional information about who can make a request. Occasionally circumstances rise with someone other than the individual with a disability requesting a reasonable accommodation for that person, perhaps a family member or Union Representative [Indiscernible]. This is perfectly acceptable, however [Indiscernible] supervisor must ask the individual with the disability if they want accommodation, with exception of when that individual is incapacitated and [Indiscernible]. Do not ask without coordinating with that employee, whenever appropriate. The employee must want that accommodation before the process begins. And make sure everyone understands that.

Now we will get into initiating the request process and I am going to [Indiscernible] from the Department of the Interior reasonable accommodation procedures and share the information with you, and if you have questions pertaining to the National Park Service specific process, they will be able to answer any of those questions [Indiscernible] cover the slides and move on to a new [Indiscernible] can get to the important stuff. That is important as a supervisor of the Reasonable Accommodation Portal that NPS created, but it's a initiating the process [Indiscernible].

[Indiscernible] Include basic medical information about accommodation be requested, [Indiscernible] interactive process, accommodation recurrent, such as a need for language sign language interpreter, a new written request is not needed every time. Just tell the person you need an interpreter wherein when [Indiscernible] Medical documentation [Indiscernible] any medical information request must conform to require [Indiscernible] Rehabilitation Act. Under the act, medical information may not be requested where the disability and the need for reasonable accommodation are obvious. All medical documentation must be kept confidential among the parties to fulfill the accommodation. Medical documentation cannot be kept in an employee's personnel file; it must be housed separately, and remember, it's Privacy Act [Indiscernible] and should be under lock and key. For additional information you can see EEOC enforcement guidance. Disability and medical examination of employees under the Americans with Disabilities Act, dated July 27, with the Disabilities Act, dated July 27, 2000, and that would be on the EEOC website, or you can contact your reasonable accommodation coordinator or your ELR representative, or Dave Davies will be on later and may have additional points on regional Point of Contact for you and I don't have that information at this time.

And continuing with medical documentation [Indiscernible] it will be reviewed [Indiscernible] occupation health services to identify the decision-maker regarding the reasonable accommodation requests, whether the employee/applicant has a covered disability without disclosing the details of any medical condition, and, once again, I will receive that without disclosing the details of any medical condition. Documentation about the disability of functional limitation must come from an appropriate professional, for example, a doctor, social worker, rehabilitation counselor, or occupational health specialist. However, only the information that is relevant to making a decision about the specific reasonable

accommodation may be requested, and you cannot ask for a person's complete medical record. You cannot ask for a person's complete medical record [Indiscernible].

Restructuring [Indiscernible] job may be modified so the person with disabilities can perform those essential functions of the position. It is first necessary to identify those tasks that may be difficult for an individual to accomplish because of a disability. The task should be analyzed to identify those factors that would specifically make it difficult for the person with disabilities to accomplish effectively. These factors should be eliminated by changing the job content, eliminating nonessential elements, delegating assignments and exchanging assignments with another employee, redesigning procedures for task accomplishment or reassignment to another position. Adjusting work schedules [Indiscernible] some people disabilities are denied employment opportunity because they cannot work the standard 9-5, 8 hour a day, 40 hours a week. This includes people who require medical treatment, people who need rest periods or whose disabilities are affected by eating or sleeping schedules. They benefit from flexible or adjusted work schedules. Other beneficiaries may include people with mobility impairment [Indiscernible] public transportation during peak hours. Effective use of flexible or off the work schedules can lead to productive and meaningful employment for these individuals and excellent results for the organization.

Flexible leave. Anyone familiar with flexible leave? Has anyone used flexible leave accommodation? What is flexible leave as it relates to RAC?

Liberal approval of absences may involve the use of excuse absences, leave, annual leave or Leave Without Pay. Sick leave should be approved when people with disabilities request it for repair of prosthesis or equipment such as wheelchairs or for the treatment of guide dogs. Inclement weather and temporary adverse building conditions are examples of situations where liberal approval or absences may be necessary, training when using assistive devices is another example where liberal approval should be given. Managers and supervisors should be aware of agency policy for excusing liberal absence.

Modified worksite were changes may be needed in the worksite area where they employee with disabilities. This may include accessibility to and around the work area, restrooms and other facilities used by the employee. Placement of furniture, carpet and equipment should be reviewed. Maneuverability adjustments may be simplest. Moving material to a lower drawer of a cabinet.

The types of accommodation, specialized equipment and assistive devices. There are many [Indiscernible] make it possible. Many devices make it possible for people disability to have a conversation [Indiscernible] task that they may not otherwise be able to do, and may also increase productivity in an efficiency. Other work devices can include PDAs, telecommunication devices for the deaf, electronic digital aid magnifiers, telephone amplifier devices, talking calculator or speakerphone [Indiscernible]. Equipment cannot be of a personal nature, such as eyeglasses or wheelchairs, but must be directly related to the performance of the job. Exceptions to the rule must be made on a case-by-case basis. Examples when

someone does not normally [Indiscernible] but might require you to travel long distances between offices for the job. Readers – employees who are blind may require a reader to perform their job effectively. A variety of options are available – sign language interpreters, personal care assistance, some people with a disability require assistance on a full-time or intermittent basis. These individuals may require [Indiscernible]. This is what a specific task such as getting from one building to another with travel on official business. Obtaining research or writing materials or using restroom facilities [Indiscernible - Background noise]. Let's talk about accommodations run by the Department of Defense [Indiscernible] provides assistive technology accommodation services [Indiscernible] Department of Defense and 38 other federal agencies at no cost.

[Indiscernible] time-consuming of all accommodations reassignment of [Indiscernible] accommodation of last resort. Once again, reassignment is the accommodation of last resort that must be considered [Indiscernible] no effective accommodations enable employees to perform initial functions of their job. If all other possible accommodations would impose a bona fide undue hardship [Indiscernible] over reassignment process shared information with you not going to get into it because [Indiscernible] case-by-case basis reasonable accommodation reassignment. Reassignment caveats [Indiscernible] most important note guarantees, and once again, [Indiscernible] Subject Matter Expert if you find yourself processing a reassignment for a reasonable accommodation [Indiscernible] briefly information about union consideration of applicable [Indiscernible] Once again, reach out your Subject Matter Expert to make a determination regarding [Indiscernible - Audio Echo].

[Indiscernible - Background noise] Another area expert specific information regarding National Park Service as it relates to denials [Indiscernible] discussed accepted or denial of reasonable accommodation should be made promptly. Another reason why the National Park Service created the portal is the agency was not compliant with the EEOC tracking reasonable accommodation request and have mechanism we can [Indiscernible] reasonable accommodation request requested, how many approved and how many denied, and annually to have to set up a report to the Department of Interior to send the report higher regarding agency reason RAC request for the year [Indiscernible] information important portal will be instrumental in helping us capture accurate information as it relates to reasonable accommodation request [Indiscernible].

Any questions so far?

None in the Chat Box

Okay. I want to ask questions and examples and first example is: An employee tells his or her supervisor I'm having trouble getting to work in my schedule starting time because of medical treatments I'm undergoing.

Is it a request for accommodation? Yes, no, maybe, I don't know?

Michelle says yes, Linda says yes, everybody says yes.

They are correct. Let me ask a follow-up: what are some of the possible accommodations and issues that could come with implementing the employee's RAC request? What would be some solutions?

Flextime schedule [Indiscernible - Background noise] Telework.

They are correct. My notes have same thing. Adjusted work schedules is correct. Thank you for your feedback and move on to the next.

An employee tells his supervisor I need six weeks off to get treatment for a back problem. Is this a request for accommodation?

Responses are no, so far everyone says, no. One says without additional details [Indiscernible - Background noise]

What are possible accommodations and issues that could come up implementing the request? Does a person [Indiscernible] himself? Are they asking to use it or asking for advanced sick leave or asking for assistance with leave donation? It is why it's important to interact with the employee making the request. They might not know what the options are, but management does an interactive process.

Next example.

We have question, Cleveland, from [Indiscernible]. She wants to know how exactly are we to document request for RA supervisors submit them to the Portal?

Hold on about seven minutes and they will be on to discuss the Portal and quite sure be answered.

[Indiscernible] uses a wheelchair and forms [Indiscernible] employer that will not fit on her knees desk. Is this a request or for reasonable accommodation?

Everyone responds, yes. Everyone is right and keep it moving, I have six minutes and have to get out of here.

An employee tells his supervisor that she or he would like a new chair because his or her present one is uncomfortable. Is this a reasonable accommodation?

It's a request for change at work, but the statement is insufficient to put the employee [Indiscernible], and notice that the employee's request for reasonable RAC [Indiscernible] need for the new chair to achieve the new chair was not a medical documentation. Management should ask the employee to specify what they mean, and maybe trying to

request accommodation of some kind and what if “I am uncomfortable” for the employee means his right arm goes to sleep all the time? This would be indicative that the employee needs to seek medical attention. [Indiscernible] problem also be indicative that management needs contact [Indiscernible] request an ergonomic evaluation on the person and their workstation. Preventing worker comp claims is a good thing. [Indiscernible - Background noise] alleviate ergonomic problem attributed to numbness would be in order and very important that you utilize an interactive process with the employee, but equally important that you get a Subject Matter Expert in the field. Get advice from them so you as the supervisor can make a well-informed decision.

Example E. An employee’s spouse calls the employee’s supervisor on Monday morning to inform him or her that the employee had a medical emergency due to multiple sclerosis and needed to be hospitalized and thus requires time off. Is this a request for reasonable accommodation?

Overwhelming yes.

We talked about how people can make an accommodation request for the employee. This is one of those times. It is unknown is how much time off will be needed and cannot be determined at this time. You may need to work through the spouse to see how to utilize available leave and if there enough sick leave. Are we talking about Leave Without Pay or advanced sick leave or looking to leave donation? Can the supervisor establish a contact for the employee to deal with these six [Indiscernible - Background noise] work with the spouse. An interactive process is important.

For last example I have a summary of the great training that you showed me you had as it relates to reasonable accommodation. You all were great [Indiscernible] goes swiftly. I appreciate you. An employee has been out of work for six months with a Workmen's Compensation injury. Per the employee's doctor sends the employer a letter stating that the employee’s released to return to work but with certain work restrictions. [Indiscernible] prompted me this is a request? Is this a request?

Overwhelming yes.

The letter constitutes a request for reasonable accommodation and the agency should first confirm with the employee that the doctors note was sent with the employee’s consent, and, if so, then management will need to engage with the employee and figuring out what accommodation or accommodations need to be made to allow the employee to fulfill the essential functions of their job.

And my time is up and I will remain on if you have questions at the end of Dave Davies’ presentation related to the information that I covered, and I will be more than glad to speak with you and try to answer questions. But at this time I want to change and hand off to Mr.

Dave Davis, the reasonable accommodation [Indiscernible] who will discuss the portal and interactive process for the National Park Service and thank you, Bridgette and Dave.

This is Dave Davies and [Indiscernible] bringing the portal up? [Indiscernible] entering the information to the portal? Primarily supervisor responsibility, it can get help and update it and navigate it with assistance from the RAC coordinator. We've had [Indiscernible] problems and I will switch my screen to the portal. In terms of using the portal, who is responsible for getting information? [Indiscernible] is relatively simple [Indiscernible - Background noise - Poor Audio]

The initial screen will ask for basic information. Asking when you got the request, assigned an ID number, a drop-down shows Region, click on regions. Put in any Region. Alaska. Create drop-down menu of part within Region what Park of office. Identify what Park it is [Indiscernible - Background noise]

Occupational code. Have you [Indiscernible - Multiple speakers]

Fill in in terms [Indiscernible] populate with choices keep it universal

Fill in any theater?

Zero

0201 -- 11

Type [Indiscernible] employee [Indiscernible] go through put in a candidate name -- >> John Smith?

Okay.

Contact number and email. I will put mine.

I spelled my name wrong.

We know where to find you. Can I submit it?

Basic data or whatever accommodation in request is [Indiscernible] hits submitted should go to next page.

Kicked me out.

It will go through some basic information about what the combination is, what the response was, whether the accommodation requested was granted, or whether it was requested additional information or whether you can [Indiscernible] the accommodation. [Indiscernible] kind of go through the interactive process and allow you to fill that in as you go along as a

supervisor. Pretty much it is a vehicle that sets up a format so that we don't miss the timeframe that Cleveland talked about earlier in the presentation. It gets the response of employee within 10 days and what the program will do initially will be to send an email to the employee and to the supervisor saying that an initial submission was made and that employee has a reasonable accommodation request and acknowledges that the request is submitted, and takes you through and keep you on track in terms of time frames and respond to the employee within the timeframe if you didn't grab the employee and gets a notice about a right to request reconsideration and to follow up on that one. [Indiscernible] is pretty much a tracking system for supervisors and reporting system that we can look back at at the end of the year and pretty quickly come up with numbers as to how many RACs we receive, and how many granted, and how many denied with status of those and how much they cost all the basic recording requirements we have.

Really the part I think is most discerning and most utility to supervisors is to keep things on track, and also the vehicle if you haven't spoken with someone to get assistance or to consult with. The RAC official in the Region in your Park would be aware of a request, so they will get emails that based on their Region and the park that request is submitted and be aware of it, whether you end up getting help from them or as for it or not. [Indiscernible] certainly should check with you to make sure the process is moving along and help you make determinations, provide with resources on finding alternatives that you need alternatives, help you find resources in terms of funding different matters. Pretty much anything you can think of to do in terms of providing reasonable accommodation to an employee or candidate.

I can't see dialog box, but are there questions about the portal and how the process works? If not, I can turn it to you Bridgette.

Dave, we get into the screen. Anyone have questions on [Indiscernible]? If you have questions for Dave or Cleveland [Indiscernible] five minutes left. Anyone have questions? I have a question from Michelle Lee at Wilsons Creek and we were wondering if there was any reason to fill out the accommodation request for volunteers?

That deals exclusively with employees for the most part and I'm not so far as I know [Indiscernible] reporting requirement is for employees right Cleveland?

Yes, correct. Just for employees.

I figured it's good question. I won't give a definite answer, but you could use it in terms of tracking system to make sure you responded to our request, but don't know that we have the same degree of responsibility for VIP reasonable accommodation requests that we do for employees [Indiscernible] somewhat greater responsibility from and in terms of using the portal to track those things I don't see where it would hurt.

[Indiscernible - Multiple speakers]

Something will work [Indiscernible] add a separate category for VIP in the drop-down when we go for [Indiscernible] employees and then add VIPs.

We have a question. The tracking mechanism you said is for RSS supervisors or that is for you, the people in DOI or in Washington? You said it's there to help track. So, am I the supervisor doing all the work and you are monitoring that to make sure I do those in 10 days? Is that what this is about?

I don't think's tracking to make sure [Indiscernible] I don't [Indiscernible] is not your solely responsibility

So you DOI and MPS would be helping me find a source for a screen or whatever then you would be back in touch with me through the portal?

Yes, exactly.

[Indiscernible] shared responsibility for the agency and wouldn't focus it on the supervisor and donated time frame, but on you. I tend to think it's more responsibility of the people who run the program. If you are not made in a time frame to get in touch with me and help you get to the point.

[Indiscernible - Background noise]

This is Cleveland, and main reason for the portal is we're so decentralized as an organization. We have over 400 different locations, so for the NPS and annual report as it relates to read RAC, up until recently we did not have a mechanism in place that could capture all of the reasonable RAC requests, and when we were filling up the NPS report, it was not nowhere near robust as it should have been because we weren't getting the information. There was a lot of accommodation RAC granted, we just were not aware of it. When I say we the people prepare the report on behalf of the National Park Service also part of our Technical Assistance is from the EEOC commission, and we were rated as noncompliant in that area because they didn't have a tracking mechanism in place so we could accurately capture. So, I would look at it as something that monitors supervisors whether they are doing it on time or when we are not doing it. I would look at it from the point of a two mechanism process and agency to where we could share with EEOC and others all of the reasonable accommodations that we are granting to our employees, and also agree to because we can use that as best practices so I don't have to reinvent the wheel. Another place [Indiscernible] reinvent the wheel, because a lot of [Indiscernible] how we could do things better, not of the different combinations on different resources us supervisors are utilizing that otherwise we would not know about.

[Indiscernible], did you have something to say or confused on anything? [Indiscernible] are you there?

I'm confused on the approval process. Is it just tracking because of what was stated or is it something that gets approved and then comes back to the park?

I will try to understand the question, but the approval processes whatever you are, somebody who has the authority to approve or disapprove the reasonable accommodation request you answer that [Indiscernible].

Okay. Because to me, like, when you put in the request, it implies approval. So, putting that in the national level was to be it seems like, it's going to be looked at there and approved or not approved, but you're saying is still just with us the recording place.

[Indiscernible] not going to be Cleveland or somebody at a higher level [Indiscernible] generally going to be within your Park.

Okay, so for tracking purposes as stated, basically.

Yes, for tracking purposes.

Okay.

It may run to the level where they [Indiscernible] have to get involved based on the nature of it, but the portal itself is just so we can capture all the reasonable accommodation request approval/denial process, that's the supervisors responsibility working with the local Subject Matter Expert and his or her partner Region to make the determination, and the main thing for the portal is so we can centralize all the National Park Service reasonable RAC requests.

Okay, thank you.

Approval never tends to be an issue anymore, and the example that was in there someone needed additional time to report to work because they were undergoing medical treatment [Indiscernible] I suppose there's examples for the person can be easily accommodated, but for the most part, I think we accommodate our own employees and don't really think of them in terms of a reasonable accommodation request. If someone comes in and says I'm getting treatment because I have condition where I [Indiscernible - Multiple speakers] fairly automatically. I don't think about event and think about something to answer provides your vehicle to present your successes [Indiscernible].

Great stuff guys, and I'm sorry we are unable to continue the conversation, and Dave, we didn't have your slide to contact Dave or Cleveland if you have further questions. If you have questions, you can contact Dave Davies or Cleveland Williams. Wwe are going to another session and have set up for the next session, which is our last session, and so if anyone has any quick questions, because we have to hang up and if you guys could want your hang up. Please leave the room, because we will now have two classes merging into one and it's hard for us to keep attendance like them. So once you are ready to disconnect thank you, Dave and thank

you, Cleveland and thank you, Kathryn and thank you, Webinar participants and if you have questions, contact Dave Davies or Cleveland Williams, and thank you.