



U.S. DEPARTMENT
of **ENERGY**

Office of the Chief
Human Capital Officer

Policy Memorandum #100D

Reasonable Accommodation

August 2026

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Purpose

This policy memorandum (PM) outlines the Department of Energy's (DOE) procedures for processing requests for reasonable accommodation (RA) for disabilities under the [Rehabilitation Act](#) and [Americans with Disabilities Act](#) (ADA), as amended. This PM defines what constitutes an RA request, details the processing steps, and specifies the information required for management to determine effective accommodation, or to determine when accommodation would pose an undue hardship.

DOE is required to post and make available an electronic version of this PM to all DOE employees and applicants in written and accessible formats. An electronic version, capable of being downloaded for printing, is available on [energy.gov](https://www.energy.gov) and [HCnet](#).

Cancellations

This PM cancels and replaces the following:

- 1) PM #100C, *Reasonable Accommodations and Personal Assistance Services*, dated January 2025
- 2) PM #134, *Religious Accommodation*, dated January 2025

Applicability

- 1) This PM applies to all DOE employees and applicants for employment.
- 2) The Administrator of the National Nuclear Security Administration (NNSA) must ensure that NNSA employees comply with their responsibilities under this PM. Nothing in this PM will be construed to interfere with the NNSA Administrator's authority under section [3212\(d\) of Public Law \(P.L.\) 106-65](#) to establish Administration specific policies, unless disapproved by the Secretary.

Equivalencies/Exemptions

- 1) Equivalency: In accordance with the responsibilities and authorities assigned by [Executive Order \(EO\) 12344](#), codified at [50 U.S.C. § 2406](#), and to ensure consistency through the joint Navy/DOE Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this PM for activities under the Director's cognizance, as deemed appropriate.
- 2) Exemption: Contractors are responsible for initiating RA requests with their employing company, not with DOE.

Requirements

A. General Requirements

- 1) Reasonable accommodation (RA) is a change in the work environment or in the way things are customarily done that enables an employee or applicant with a disability to enjoy equal employment opportunities. There are three categories of RA:
 - a. Modifications or adjustments to a job application process that enable a [qualified applicant with a disability](#) to be considered for the position;
 - b. Modifications or adjustments to the work environment, or in the way things are customarily performed, that enable a [qualified employee with a disability](#) to perform the [essential functions](#) of the position; or
 - c. Modifications or adjustments that enable employees with disabilities to enjoy equal [benefits and privileges of employment](#) that are enjoyed by other similarly situated employees without disabilities.
- 2) Examples of RAs related to job performance include:
 - a. Job restructuring or modifications of marginal job functions;
 - b. Altering when and/or how a function, essential or marginal, is performed;
 - c. Approving leave, paid or unpaid, so employees can obtain medical treatment, recover from an illness, receive repairs on personal medical equipment, train a service animal, or avoid temporary adverse conditions in the work environment.¹
 - d. Telework or remote work, only if there is no other effective accommodation(s).
- 3) An accommodation is limited by necessity, feasibility, and impact. Accommodations may not be feasible in certain circumstances, as outlined in the [Denying RA Requests](#) section.
- 4) Heads of Departmental Elements (HDE) have the discretion to designate management officials to serve as deciding management officials (DMO) and reconsideration officials for their organization(s), and these officials can be within or outside the immediate supervisory/managerial chain of command. Absent designation, DMOs will default to the first-level supervisor of the position, and reconsideration officials will be the second-level supervisor.

¹ Supervisors shall not penalize an employee for using leave as a RA because this could be considered retaliation. Supervisors can deny leave as a RA if an undue hardship exists.

- 5) Local Reasonable Accommodation Coordinators (LRACs) in Servicing Human Resources Offices (SHRO), Shared Service Centers (SSC), and/or Human Capital (HC) are responsible for processing and facilitating all RA requests.
- 6) SHRO/SSCs must coordinate with HC and DEs to ensure adequate resources are available to support:
 - a. DOE-authorized medical professionals who possess the necessary expertise to review, interpret, and validate medical documentation submitted during the RA process, when needed; and
 - b. Qualified investigators tasked with reviewing potentially false claims limited to RA decisions and only when specific, objective, and credible facts indicate an employee provided false or misleading information.
- 7) The timeline for approving or denying requests starts as soon as the request is received. Absent any extenuating circumstances, requests for RA should be processed expeditiously. Failure to process the request in a timely manner may result in a violation of the Rehabilitation Act.
- 8) If a request is submitted during the pendency of an administrative action (e.g., conduct or performance-based action), management must evaluate the RA request in conjunction with the administrative action on a case-by-case basis in consultation with their servicing Employee Relations (ER) Specialist and General Counsel (GC).
 - a. A decision to temporarily suspend administrative action until the completion of the RA process is at management's discretion.
 - b. Regardless of whether an RA has been requested, misconduct and poor performance cannot be tolerated. Corrective action and/or discipline are not required to be paused or withheld during the pendency of an RA request.

Funding

- 1) Most accommodations are provided at no cost and involve only a modification of a policy or procedure. Some accommodations may incur a single cost, such as hardware, while others may incur a recurring fee, such as sign language interpreters or PAS. An RA will not be denied if DOE determines the cost is *de minimis* or reasonable, but significant costs may pose an undue hardship and could result in denial of the RA request.
- 2) When an employee or applicant requests remote work or a change in duty location as a reasonable accommodation, DOE will evaluate whether the request imposes an undue hardship, including consideration of direct and indirect costs. Specific cost factors to be assessed include potential increases due to higher locality pay and anticipated travel funds required for the employee to attend mandatory on-site meetings or operations at the DOE facility.

- a. If the request is approved this will be considered a voluntary change in duty location, and the employee will not be entitled to relocation expenses. Any costs associated with moving to the new location are the sole responsibility of the employee.
 - b. Furthermore, if the accommodation subsequently expires, is modified, or deemed ineffective, the employee is responsible for returning to the original DOE duty location at their own expense.
- 3) Funding for RAs is provided by the applicable DE, and each DE should set aside funds on a yearly basis to cover the costs of any equipment, services, or training needed for reasonable accommodation.
- 4) Hardware, software, devices, furniture, and other items purchased by DOE as accommodation are the property of DOE. Employees may not use the items for a purpose or in a manner not originally intended without DOE's approval.

Confidentiality

- 1) All aspects of the RA process must be kept confidential. This includes the RA request, the decision, the disability, and any medical information obtained during the process.
 - a. Confidential information includes the fact that someone is receiving accommodation or has a disability, and this cannot be shared with coworkers or others that do not have an official need to know.
 - b. Those who obtain or receive such information are strictly bound by confidentiality requirements.
- 2) Confidential information may be disclosed to:
 - a. Supervisors, DMOs, LRACs, and DOE-authorized medical professionals directly engaged in the interactive and decision process;
 - b. Employees authorized to collect and report RA-related data as outlined in the [Reporting Requirement](#) section;
 - c. Safety and emergency personnel if the disability requires emergency treatment;
 - d. Government officials who investigate the RA program for compliance with the Rehabilitation Act;
 - e. DOE-authorized investigators tasked with investigating potentially false or misleading information connected to a reasonable accommodation decision; and
 - f. Workers' Compensation offices or insurance carriers only to the extent necessary to process a claim.

Reporting Requirements

- 1) DOE will keep records used to determine whether it is complying with the nondiscrimination and affirmative action requirements imposed under Section 501, and to make such records available to EEOC upon their request. Documents will be collected and maintained under the relevant Privacy Act System of Records.
- 2) Supervisors cannot store RA-related documents in local employee files/folders, unless the records can be secured with restricted access.
- 3) LRACs are responsible for tracking and retaining records related to all RA requests in the Department's authorized IT system, and details must include:
 - a. Employee or applicant names and position-related information such as DE, office, position title (official and working title), occupational series, grade level, etc.;
 - b. The specific accommodation(s) requested;
 - c. Whether the accommodation was needed to apply for a job, perform the essential functions of a job, or enjoy the benefits and privileges of employment;
 - d. Whether the request was granted (which may include accommodation different from the one requested) or denied;
 - e. The reasons for denials or alternative accommodation;
 - f. The names of all management officials involved in the process; and
 - g. Amount of time to process requests.
- 4) Records of employees will be retained for the duration of their tenure to assist with limiting requests for medical information previously submitted. All other records will be stored in accordance with DOE's record retention policy, or for the duration of litigation-hold timelines, if applicable.

B. Reasonable Accommodation Process

How to Request an RA

- 1) Employees may initiate an oral or written request with their supervisor or their designated LRAC at any time.
 - a. A request for support or administrative services (e.g., information technology services) must be initiated through either the supervisor or LRAC, not directly with the office providing the services.
 - b. If an employee submits an RA request directly to an office providing administrative services rather than through their chain of command, the receiving administrative office must notify the employee to submit the

request to their supervisor or the designated LRAC to initiate the RA process.

- 2) The initial request does not have to be made in any specific format or even include the words “reasonable accommodation.” Employees can simply state they have a need for assistance based on a disability.
- 3) A designated representative or third party (e.g., family member, health professional, or supervisor) may request an RA on behalf of the employee with a disability if the employee is unable to do so for themselves.
- 4) If a supervisor is the initial recipient of the RA request he/she must forward the RA request to the designated LRAC.
- 5) Once the RA process begins, the employee must use DOE’s RA templates to help ensure expediency of processing. Requests must include:
 - a. The specific nature of the medical condition (diagnosis, prognosis, etc.) and how it specifically affects [major life activities](#);
 - b. The impact of the disability upon the employee’s performance of duties and how the disability restricts or limits the employee from functioning without the accommodation;
 - c. Identification of any [workplace barriers](#); and
 - d. Specific accommodation(s) requested and explain how this will assist the performance of job duties or ability to enjoy [benefits and privileges](#) of employment.²
- 6) Accommodations needed on a repeated basis does not require the employee to submit a written request each time the accommodation is needed.
 - a. For example, an employee who needs a sign language interpreter for meetings does not need to submit a new RA request each time the need arises. The supervisor or DMO will provide instructions on how the employee can order the service (e.g., via email to their supervisor with appropriate advanced notice).

Interactive Process

- 1) The interactive process is meant to explore effective accommodations that allow a [qualified employee with a disability](#) to perform the [essential functions](#) of the position.
- 2) The interactive process requires full participation, open communication, and ongoing dialogue between the employee, supervisor, DMO, LRAC, and other appropriate parties.

² It will be in an employee’s best interest to request RA before performance suffers or conduct problems occur.

- 3) The LRAC will engage the employee, supervisor, and DMO separately or jointly, and possibly repeatedly, to develop a complete record including, but not limited to:
 - a. Identifying and/or obtaining administratively acceptable supporting documentation identifying the employee's functional limitations;
 - b. Documenting essential functions of the employee's position of record; and
 - c. Consideration of potential accommodations.
- 4) If the employee does not respond to the LRAC's request to engage in the interactive process, the RA case will be administratively closed.

Interim Accommodations

- 1) In certain circumstances, the DMO may provide interim accommodation on an expedited, temporary, or provisional basis pending the final decision, absent undue hardship.
- 2) When providing interim accommodation, the DMO must:
 - a. Advise the employee in writing the accommodation is temporary and provisional;
 - b. Specify the interim accommodation will expire and, to the greatest extent possible, when it will expire (e.g., on a specific date, after the installation of appropriate assistive technology); and
 - c. Clarify that providing interim accommodation does not guarantee or imply that the same accommodation will be deemed effective or approved as permanent accommodation.
- 3) Providing interim accommodation while awaiting medical documentation is not presumption of a disability. A final determination will be made once sufficient administratively acceptable medical documentation has been received.

Essential Functions

- 1) Essential functions are the fundamental job duties of the position that the employee must be able to perform, with or without accommodation.
- 2) Supervisors are responsible for identifying the essential functions and must consider the following factors:
 - a. The nature of the function and its importance to the job;
 - b. The number of other employees who could perform it;
 - c. Degree of skill or expertise required;
 - d. Time spent on the function;
 - e. Consequences of not performing it; and

- f. Specialized or unique requirements, to include a license or certification.
- 3) Essential functions include physical and mental elements, and should be supported by the position description, performance plan, and/or other office-specific operational requirements.
- 4) Supervisors are required to provide essential functions within five calendar days of the LRAC's request.
- 5) Essential functions should be shared with the employee and his/her healthcare provider to assist in identifying functional limitations and exploring effective accommodation.

Supporting Medical Documentation

- 1) When a disability or need for accommodation is not obvious or otherwise known to DOE, the employee will be required to submit administratively acceptable medical documentation substantiating the disability.
 - a. The LRAC will provide the employee with the relevant form for completion by the appropriate medical professional.
 - b. Appropriate medical professionals include, but are not limited to, doctors, psychiatrists, psychologists, nurses, physical therapists, occupational therapists, speech therapists, vocational rehabilitation specialists, and licensed mental health professionals.
- 2) Medical documentation must establish that:
 - a. The employee has a disability under the Rehabilitation Act;
 - b. The disability necessitates accommodation; and
 - c. The accommodation requested will enable the employee to perform the [essential functions](#) of the position.
- 3) The LRAC may request the following types of information or documentation regarding the disability including, but not limited to:
 - a. The past, present, and expected future nature, severity, and duration of impairment (e.g., functional limitations, symptoms, side effects of any treatment, etc.);
 - b. The activities the impairment limits;
 - c. The extent to which the impairment limits the individual's ability to perform the activities limited by the impairment;
 - d. The reason the employee requires accommodation; and
 - e. How the requested accommodation will enable the employee to perform the essential functions of a job, or access privileges of employment.
- 4) Employees will have 15 calendar days to submit administratively acceptable medical documentation.

- a. Employees can request an extension not to exceed 45 calendar days.
 - b. If sufficient medical documentation is not provided within the deadline, the LRAC will administratively close the RA request.
 - c. If sufficient medical documentation is provided to the LRAC after administrative closure, a new request may be initiated.
- 5) If the medical documentation is insufficient, the LRAC will close the request and provide a summary of this determination. The employee can subsequently initiate a new request with updated medical documentation.
- 6) DOE may, at its own expense, obtain a medical professional's review of medical information to verify the existence of a disability, evaluate the need for accommodation, and assist the DMO in identifying appropriate accommodation options.
- a. Employees can sign a release allowing DOE's medical professional to contact their health care professional regarding the submitted documentation. If the employee does not authorize a waiver, DOE's medical professional will offer recommendations based on the documentation provided.

Determination Process

- 1) Deciding management officials (DMOs) will issue all decisions regarding RA requests in writing.
- 2) The DMO has the discretion to choose the accommodation when more than one effective accommodation is identified. The DMO's granting of alternative accommodation will be considered a decision to grant the accommodation.
 - a. If the employee believes the alternative accommodation is not effective, the employee may request [reconsideration](#).
 - b. The employee does not have a right to reject any accommodation provided by the DMO. The employee can request leave or interim accommodation pending a reconsideration request, but approval is at management's discretion.
 - c. Employees can initiate a new RA request only after making a good faith effort to use the original accommodation provided. This requirement ensures that the existing accommodation is fully evaluated in practice before alternative accommodation is considered.
- 3) Decisions approving accommodation requests will specify the approved accommodation, the duration, and the employee's functional limitations. This allows supervisors to determine the effectiveness of any future changes to the position.
 - a. The DMO will ensure all approved accommodations are communicated to personnel who have a need to know and those responsible for implementing the accommodation(s).

- b. Approved accommodations can be reassessed by management at any time, and particularly when an accommodation is not effective (e.g., the employee is unable to perform essential functions with the accommodation).

Denying RA Requests

- 1) Reasons a request may be denied include, but are not limited to:
 - a. Undue Hardship: Requested accommodation would create significant financial burden, substantial operational disturbance, or fundamental changes to the workplace³;
 - b. Safety: Accommodations cannot create an environment which threatens the health or safety of anyone in the workplace⁴; or
 - c. Equipment: Accommodations cannot require the agency to provide personal-use items (wheelchairs, hearing aids, prescription eyeglasses, etc.).
 - d. Essential Functions: Accommodations cannot remove duties and responsibilities required by the job or lower production standards;
 - e. The employee is not a qualified person with a disability; or
 - f. The accommodation requested is not effective and there are no alternative accommodations.
- 2) Before the DMO can officially deny an RA request, GC review is required.
- 3) If the DMO denies an RA request, the written decision will clearly state the specific reason for the denial (general conclusions are not sufficient) and provide notice of the right to request [reconsideration](#), file an Equal Employment Opportunity (EEO) complaint⁵, or invoke other statutory processes, as appropriate.
- 4) Denial decisions will offer the employee the opportunity to participate in the reassignment as an accommodation of last resort (RALR) process, if appropriate.

Reassignment as an Accommodation of Last Resort (RALR)

- 1) When an employee cannot perform the essential functions of their current position and no accommodation can be provided, the search for a reassignment must be done before initiating the employee's removal for medical inability to

³ DOE's overall size and financial resources must be considered when assessing significant financial burden.

⁴ It is not appropriate for denials to be based solely on employees' or customers' fears or prejudices toward the employee's disability, or that the accommodation may have a negative impact on the morale of other employees.

⁵ The reconsideration process does not pause or extend deadlines to file an EEO complaint, grievance, or invoke any other administrative process.

perform their duties. This is referred to as a reassignment as an accommodation of last resort (RALR).

- 2) RALR is not considered in the following scenarios:
 - a. The medical professional indicates the employee is no longer able to work due to their disability. In such case, the employee may choose to separate voluntarily (retire or resign), or DOE may begin the involuntary separation process;
 - b. The employee is on a probationary or trial period and was never able to perform the essential functions of the position, with or without accommodation, before the need for reassignment arose;
 - c. The employee is only qualified for the current position of record, and the employee can no longer perform that position with or without accommodation; or
 - d. The employee refuses to engage in the RALR process.
- 3) The RALR process requires DOE to review vacant (or anticipated to become vacant) and funded positions for which the employee is qualified for a period of 30 calendar days.
 - a. Eligible positions include when a supervisor or DE resource manager initiates a request with Human Capital (HC) to fill a position, with or without an announcement seeking applications.
 - b. A position is not considered vacant if a tentative selection has been made by the hiring manager. This includes the hiring manager's written notification to HC of their tentative selection, or the issuance of a tentative job offer.
 - c. Employees must be minimally qualified for the position with the requisite skill, experience, education, or other job-related requirements, and must be able to perform the essential functions of the new position with or without accommodation.
 - d. DOE does not have an obligation to assist or train the employee to become qualified for a position. DOE's only obligation is to provide the employee with training normally provided for all employees hired in the position.
- 4) When multiple positions are identified, the employee will be reassigned to one most equivalent to the employee's current position in terms of pay, status, benefits, and geographic location, as determined by management.
 - a. When there are no equivalent vacant positions, the employee can be reassigned to a lower graded/level position, or the search will end after 30 calendar days.
 - b. If a position is identified in a different geographic area, the employee will pay for their own relocation expenses, unless relocation expenses are routinely

- paid when granting voluntary reassignments of other employees, or if relocation assistance was advertised in the vacancy announcement.
- c. If a position is identified at a lower grade, pay band or equivalent, the employee is not entitled to maintain their current salary, unless DOE offers pay retention to other employees without disabilities in similar situations; or the employee is eligible for mandatory pay retention. DOE will set pay using the procedures outlined in [PM#139, Pay Administration](#), or its successor.
 - d. Promotions or opportunities for higher salaries will not be considered or offered.
- 5) The designated LRAC will work with the employee to document any preferences or limitations for the reassignment search, and obtain the employee's updated resume and transcripts, if necessary. This consultation will help determine:
- a. If the employee is willing to be reassigned outside the current facility or commuting area and if so, what locations/facilities;
 - b. If the employee is willing to be reassigned to a different type of position they are qualified for, and which one(s);
 - c. If the employee is willing to be reassigned to a different DE, office, or subcomponent of the Department, and which one(s);
 - d. If the employee is willing to be reassigned to a lower graded position if one at their current grade is not available and if so, down to what grade(s).
- 6) The LRAC will share the employee's preferences with HC's Office of Workforce Administration Policy Division ([OWAM-PD](#)), and the employee will be added to the Department's (RALR) list.⁶ As part of this process OWAM-PD will:
- a. Perform a qualification review and determine what occupational series and grades the employee is minimally qualified for;
 - b. Add the employee to the RALR list for a period of 30 calendar days after the qualification review is completed;
 - c. Communicate with the Servicing HR Offices/Shared Service Centers (SHRO/SSC) when a position is identified and notify the designated LRAC of the potential position so the LRAC can engage the appropriate hiring manager; and
 - d. Provide a final list to the designated LRAC upon the completion of the 30-calendar day search window for all potential vacancies or advise the LRAC if none were identified.

⁶ This process will function like the Reemployment Priority Placement process, and SHRO/SSCs must clear the RALR list before announcing new positions.

- 7) If a position is identified, the LRAC will engage the appropriate hiring manager to initiate the [interactive process](#).
 - a. If the hiring manager determines the employee can perform the essential functions of the position, the employee will receive a written offer of reassignment. The employee will have seven calendar days to accept or decline the job offer. A non-response will be considered a declination.
 - b. If the hiring manager, or designated DMO, determines the employee cannot perform the essential functions of the position, with or without accommodation, or the accommodation will result in undue hardship, the hiring manager/DMO will issue a written decision [denying the request](#).
- 8) The RALR process ends when:
 - a. The employee accepts a reassignment offer;
 - b. The employee declines a reassignment offer because this signifies DOE has met its obligations and no further search will be conducted;
 - c. The employee resigns, separates or is voluntarily placed in another position (e.g., competitive announcement); or
 - d. The 30-day search period expires and no positions were identified.
- 9) If no positions are identified or if the employee declines a reassignment offer, the LRAC must share these results in writing with the employee and the original DMO and advise the original DMO to contact their Servicing Employee Relations Office for next steps.

Disability Retirement

- 1) The Office of Personnel Management (OPM), not DOE, makes decisions on all retirements, to include those related to disability.
- 2) As a condition for eligibility for disability retirement, DOE must certify it is unable to accommodate the employee's disability in their present job and disclose all efforts to accommodate, to include any search for other vacant jobs within the Department for which the employee is qualified.

Reconsideration Process

- 1) If a request is denied, or the employee believes the alternative accommodation(s) is not effective, the employee may submit a request for reconsideration.
- 2) The employee must submit a request for reconsideration to the designated reconsideration official within five business days of the employee's receipt of the RA determination.

- 3) The reconsideration official will have ten business days from receipt of the reconsideration request to issue a decision to the employee, absent extenuating circumstances.
- 4) The reconsideration official will consult with the LRAC and GC prior to issuing a decision. The reconsideration official may also contact the employee.
- 5) The reconsideration official's decision is the final step in the formal RA process and procedure.

C. Other Types of Reasonable Accommodation Requests

The following categories are other types of reasonable accommodation. The processing of these requests will generally follow the procedures described previously in this PM, unless otherwise stated.

Job Applicants

- 1) An applicant with a disability, like all other applicants, must be able to meet DOE's requirements for the position, such as education, training, employment experience, skills, or licenses. In addition, the applicant must be able to perform the essential functions of the job, with or without accommodation. DOE cannot refuse to consider an applicant because the individual requires an RA to compete for or perform a job.
- 2) Applicants requiring reasonable accommodation for any part of the application process should contact the SHRO/SSC point of contact (POC) listed in the Job Opportunity Announcement (JOA) and inform the POC that a change or adjustment to the application/interview process is being requested due to a disability. The request can be made verbally or in writing by the applicant or another person, such as a family member or healthcare professional, if the applicant is unable to do so for themselves.
- 3) The SHRO/SSC POC must immediately contact the designated LRAC to process the RA request, and this includes coordination with hiring manager or DOE offices that provide administrative services.
 - a. LRACs will confirm receipt of the request with the applicant within two calendar days.
 - b. If medical documentation is required for non-obvious conditions, applicants will have five calendar days to provide the information.
 - c. Hiring managers or administrative offices will respond to requests within three calendar days of being contacted by the LRAC.
- 4) Examples of accommodations during the hiring process include, but are not limited to:
 - a. Providing written materials in accessible formats, such as large print, braille, or audio format;

- b. Providing readers or sign language interpreters;
 - c. Ensuring that recruitment, interviews, tests, and other components of the application process are held in accessible locations;
 - d. Providing or modifying equipment or devices; and
 - e. Adjusting or modifying application policies and procedures.
- 5) If a written test is part of the interview process, an applicant may request a modification or adjustment to the test as an accommodation, unless the test is designed to measure a required skill.
- 6) Reassignment is not available to applicants as reasonable accommodation.

Personal Assistance Services (PAS)

- 1) DOE employees are eligible for personal assistance services (PAS) during work hours and when on work-related travel, if the following conditions apply:
- a. The employee has a targeted disability and requires PAS because of their targeted disability;
 - b. The employee will be able to perform the essential functions of the job without posing a direct threat to safety once PAS and any other accommodation have been provided; and
 - c. Providing PAS will not impose an undue hardship on DOE.
- 2) DOE can provide PAS on official travel in several different ways, including:
- a. Authorizing official travel for any DOE employee who regularly provides PAS as part of their official duties;
 - b. Travel by a contract PAS provider, consistent with the contract terms and scope of work;
 - c. A temporary appointment or issuance of invitational travel orders to an individual personally associated with the requesting employee; or
 - d. Any combination of the above.
- 3) DOE may provide PAS via contractors or Federal employees, depending on the employee's needs and the operational resources required to establish and provide PAS.
- 4) DOE may employ personal assistants for eligible employees with targeted disabilities. PAS providers hired as employees may also perform non-PAS duties as assigned, but only to the extent that doing so does not result in failure to provide required PAS in a timely manner.
- 5) An employee may request permission to bring their own PAS provider as a reasonable accommodation if the employee covers the cost of those services.

- 6) DOE is not required to provide PAS to help the employee commute to and from his/her worksite.
- 7) DOE is required to provide PAS during telework if the employee is eligible for PAS and is authorized to telework as a reasonable accommodation. The determination of whether PAS can be provided to an employee while teleworking will be made by DMOs on a case-by-case basis.

Pregnant Workers Fairness Act (PWFA)

- 1) DOE is required to provide reasonable accommodation to employees and applicants with known limitations related to pregnancy, childbirth, or related medical conditions unless doing so causes undue hardship.
 - a. Temporarily suspending or modifying essential functions, placement on light duty, or temporary reassignment to another position can be considered if these do not cause an undue hardship.
- 2) Medical conditions related to pregnancy or childbirth include illnesses, complications, and symptoms. Examples include morning sickness, gestational diabetes, hypertension, miscarriage, sciatica, lactation or the need to express breast milk, physical injuries, recovery, and postpartum depression.
- 3) A known limitation does not have to meet the definition of a disability under the ADA.
- 4) Employees with normal, uncomplicated pregnancies may experience pregnancy related limitations that are covered under the PWFA.

Religious Accommodations

- 1) DOE has an obligation to provide reasonable accommodation that affords applicants and employees an opportunity to practice their sincerely held religious beliefs or observations unless doing so would create an undue hardship.
- 2) If more than one equally effective accommodation is identified, the DMO will select the accommodation determined to best fit the needs of the employee and the work environment.
- 3) The LRAC may need to ask the employee or applicant relevant questions, including but not limited to:
 - a. What is the religious nature of belief, observance, or practice at issue?
 - b. What change or adjustment to the work requirement do you need to be able to observe or practice your religion?
- 4) Types of religious accommodation may include, but are not limited to:
 - a. Schedule changes and flexible schedules to accommodate religious observations such as daily prayer or Sabbath observance;

- b. Allowing employees non-paid time to pray or engage in other forms of religious expressions at work (e.g., use of workstations or facilities for individual or voluntary group prayer or meditation);
- c. Allowing exceptions to dress and grooming policies (e.g., wearing a cross necklace, hijab, turban, yarmulke or kippah, abaya, ash mark, facial hair, or to carry a kirpan).

Roles and Responsibilities

A. Heads of Departmental Elements (or Designee) will:

- 1) Ensure that Presidential directives, Federal laws, regulations, OPM, EEOC, and DOE policies are followed;
- 2) Provide adequate oversight to ensure approved accommodations and denials comply with this PM and are balanced with DE specific mission objectives; and
- 3) Designate deciding management officials and reconsideration officials or confirm these officials can be within employees' immediate chain of command.

B. Office of the Chief Human Capital Officer (HC) will:

- 1) Review and incorporate legislation and EEOC and OPM regulatory changes into this policy;
- 2) Serve as an advisor to agency leadership;
- 3) Approve all Departmental reports and materials sent to OPM, EEOC, or other regulatory, third-party organizations, agencies or non-Federal organizations; and
- 4) Advise SHRO/SSCs on any new regulations regarding this PM.

C. Office of Workforce Administration and Management (OWAM) will:

- 1) Develop, promulgate, and implement policies, standards, and procedures consistent with applicable laws and regulations;
- 2) Provide a contact to serve as the RA Program Manager to advise and collaborate with SHRO/SSCs and their designated LRACs on policy and procedures involving reasonable accommodation; and
- 3) Manage the Reasonable Accommodation of Last Resort List department-wide;

D. Servicing Human Resources Offices and Shared Service Centers (SHRO/SSC) will:

- 1) Follow all applicable policies and procedures relevant to this PM;

- 2) Ensure adequate staffing levels for Local Reasonable Accommodation Coordinators, DOE-authorized medical professional(s), and investigator(s);
- 3) Maintain records consistent with this policy and local procedures; and
- 4) Make sure the RALR list is cleared by OWAM-PD prior to announcing new positions.

E. General Counsel (GC) will:

- 1) Provide legal advice and guidance on the RA process to SHRO/SSCs, supervisors, and managers; and
- 2) Provide legal analysis for undue hardship and direct threat cases to ensure denials are legally compliant.

F. Supervisors/Managers will:

- 1) Be informed of the RA process, specifically with the EEOC Enforcement Guidance listed in the References Section;
- 2) Consult with their designated LRAC, DOE-authorized medical professional, and/or GC as required by this PM;
- 3) Actively and promptly participate in the interactive process to determine the appropriate accommodation; and
- 4) Adhere to the timeframes outlined in this PM to the extent practicable absent extenuating circumstances.

G. Equal Employment Office (EEO) will:

- 1) Conduct audits of the RA program and recommend changes accordingly; and
- 2) Independently prepare and respond to EEOC RA reporting requirements, such as the MD-715 report, based on data provided by OWAM's RA Program Manager.

Additional Information

Questions concerning this PM should be sent to the Office of Workforce Administration and Management, Policy Division at HC.Policy@hq.doe.gov.

Local Reasonable Accommodations Coordinators' contact information is available [here](#).

References

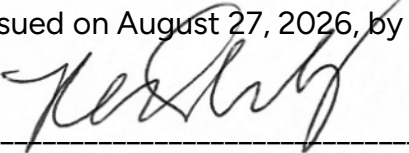
- 1) [29 CFR Part 1614](#), Federal Sector Equal Employment Opportunity
- 2) [29 CFR Part 1630](#), Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act

- 3) [Americans with Disabilities Act of 1990](#) (PL 101-336)
- 4) [Americans with Disabilities Act Amendments Act of 2008](#) (PL 110-325)
- 5) [EEOC Management Directive 715 \(EEO MD-715\)](#), dated October 2003
- 6) EEOC Enforcement Guidance: [Disability-Related Inquiries and Medical Examinations of Employees Under the Americans with Disabilities Act](#) (July 27, 2000).
- 7) EEOC [Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA](#)
- 8) [EEOC and OPM FAQs on Federal Sector Telework to Accommodate Disabilities](#) (February 2026)
- 9) [Executive Order 13164](#), Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation, dated July 2000
- 10) OPM [Reasonable Accommodations](#)
- 11) [Pregnant Workers Fairness Act](#)
- 12) [Privacy Act of 1974](#)
- 13) [Rehabilitation Act of 1973](#) (PL 93-112, 29 U.S.C. § 701 et. seq.)

Attachments

- 1) Additional Key Terms and Definitions

Issued on August 27, 2026, by



Reesha Trznadel
Chief Human Capital Officer

Attachment 1: Additional Key Terms and Definitions

Accessible Formats

Ways of presenting printed, written, or visual materials so that people who do not read print can access it. Examples include large print, Braille, accessible web content, or audio recording.

Benefits and Privileges of Employment

Include, but are not limited to, employer-sponsored training, employee assistance program (EAP), credit unions, cafeterias, lounges, gymnasiums, auditoriums, parties or other social functions.

Disability

Under the Americans with Disabilities Act (ADA), a disability is any physical or mental condition that substantially limits one or more major life activities, or a history of such a condition, or being regarded as having one.

Interactive Process

The interactive process refers to an information-gathering approach with the employee to evaluate a request for accommodation. It is intended to be flexible centered on communication between the employee and his/her supervisor(s) and often involves obtaining medical documentation and essential functions to determine effective accommodation. Local Reasonable Accommodation Coordinators (LRACs) facilitate this process.

Major Life Activities

Include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, working, and the operation of a major bodily function.

Minimum Qualifications

Qualification standards of the minimum requirements necessary to perform work of a particular occupation successfully and safely. Requirements may include specific job-related work experience, education, medical or physical standards, training, security, and/or licensure.

Qualified Person with a Disability

A person with a disability who meets legitimate skill, experience, education, or other requirements of position that he or she holds or seeks, and who can perform the essential functions of the position with or without reasonable accommodation.

Service Animal

Any dog that is individually trained to perform tasks for a person with a disability. These tasks must be directly related to the person's disability. Examples of tasks include guiding someone who is blind, alerting those who are deaf, pulling a wheelchair, or aiding during a seizure. The ADA does not recognize emotional support animals as service animals. Supervisors and DMOs must engage in the interactive process when an employee requests to bring a service animal to work. This includes assessing the request and determining if the accommodation is reasonable and does not impose an undue hardship.

Targeted Disability

A specific type of disability that is designated as a "targeted disability or serious health condition" on the U.S. Office of Personnel Management's [Standard Form 256](#).

Workplace Barriers

Any obstacle (physical, attitudinal, policy-based, or systemic) that prevents a qualified person with a disability from obtaining, maintaining, or advancing in employment, or from enjoying equal employment opportunities. Examples include when work is performed, how breaks are taken, or how essential or marginal functions are performed.