



DEPARTMENT OF THE ARMY
ADMINISTRATIVE ASSISTANT TO THE SECRETARY OF THE ARMY
105 ARMY PENTAGON
WASHINGTON DC 20310-0105

MEMORANDUM FOR All Headquarters, Department of the Army Personnel

SUBJECT: Headquarters, Department of the Army Reasonable Accommodation Policy

1. References. See references enclosed.
2. Purpose. To prescribe policy, procedures, and responsibilities for implementing the Headquarters, Department of the Army (HQDA) plan for reasonable accommodations.
3. Applicability. This policy memorandum applies to all Headquarters, Department of the Army (HQDA), Army civilian employees (appropriated and non-appropriated fund), former employees, applicants for employment, and, in limited cases certain contractor employees covered by Army Regulation (AR) 690–600.
4. Policy. HQDA is committed to providing equal employment opportunity to Army civilian employees and applicants, to include reasonable accommodations and Personal Assistance Services (PAS). This includes reasonable accommodations for qualified employees and applicants for employment with a disability; due to pregnancy, childbirth, or related medical conditions regardless of whether the conditions qualify as disabilities; and those based on religion, meaning sincerely held religious beliefs, practices, or observances.
5. Definitions.
 - a. Under the Rehabilitation Act of 1973, as amended, a reasonable accommodation (RA) is any change in the work environment or in the way things are customarily done that enables a person with a disability to enjoy equal employment opportunities. A RA addresses the barriers to enable an applicant to apply for a job or enable a qualified employee to perform the essential functions of the job held or desired. To be a qualified individual with a disability, the employee or applicant must be able to perform the essential functions of the position with or without a RA. The Agency does not have to provide a RA if doing so would cause an undue hardship.
 - b. The Pregnant Worker's Fairness Act of 2022 (PWFA) amends the Rehabilitation Act by requiring employers to provide RAs for an applicant or qualified employee's known limitations related to pregnancy, childbirth, or related medical conditions, regardless of whether the condition(s) qualify as disabilities. Under the PWFA, removal of essential functions is not considered unreasonable if any inability to perform an

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essential function is for a temporary period, and the inability to perform the essential function can be reasonably accommodated.

c. Title VII of the Civil Rights Act requires a RA for an employee's religious beliefs or practices. The RA is usually a modification/exception to a rule or policy or an adjustment to a work schedule that enables an employee to abide by their sincerely held religious beliefs, and/or observe religious practices. The Agency does not have to provide a RA if doing so would create an undue hardship.

6. Procedures and Responsibilities.

a. The Equal Employment Opportunity Directorate has the lead for implementing, facilitating, and maintaining a recordkeeping system for this program within HQDA. The Disability Program Manager is responsible for processing requests for reasonable accommodations for disability, religion, and under the PWFA.

b. Requests for RAs due to a disability are processed in accordance with AR 690-12, Appendix C. When requesting a RA for disability, pregnancy, or religion, employees or applicants must provide the information necessary to determine eligibility for a RA. Absent extenuating circumstances, the requested accommodation should be granted, denied, or offered an effective alternative accommodation within 30-business days from the date the decision maker receives the initial request. However, the 30-business day timeline is paused pending receipt of the requested medical information or supporting documentation. Once the information has been received, the timeline resumes. Any intent to deny requests for RA or to provide an effective alternative accommodation must first be coordinated with the servicing legal and EEO offices.

c. All HQDA civilian and military supervisors will follow Army procedures that support the prompt, fair, and efficient processing of requests for RA, support the implementation of granted RAs, and continue to support the principles of equal employment opportunity. All organizations will forward reasonable accommodation information to the EEO Directorate within 2 business days.

7. Proponent. The proponent for this HQDA policy is the Equal Employment Opportunity Directorate. For more information on the reasonable accommodation process, or to discuss an employment issue, contact the directorate at usarmy.pentagon.hqda-eeo.mesg.reasonable-accommodations@army.mil.

Encl

MATTHEW SANNITO

REFERENCES

- a. Title 38, United States Code, section 4214 (Employment within the Federal Government), as amended
- b. Title VII of the Civil Rights Act of 1964 (Title VII)
- c. The Rehabilitation Act of 1973, sections 501 and 505, Public Law 93-112, as amended
- d. The Pregnant Workers Fairness Act of 2022, Public Law 117-328, as amended
- e. Executive Order 13164 (Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation), 26 July 2000
- f. Executive Order 13548 (Increasing Federal Employment of Individuals with Disabilities), 26 July 2010
- g. Equal Employment Opportunity Commission (EEOC) (Practical Advice for Drafting and Implementing Reasonable Accommodation Procedures Under Executive Order 13164), 19 July 2005
- h. EEOC (Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation), 20 October 2000
- i. Army Regulation (AR) 600–7 (Unlawful Discrimination on the Basis of Disability in Programs and Activities Receiving Federal Financial Assistance from or Conducted by the Department of the Army), 6 February 2025
- j. AR 690–12 (Civilian Personnel Equal Employment Opportunity Programs), 6 February 2025
- k. AR 690–600 (Equal Employment Opportunity Discrimination Complaints), 6 February 2025